
Safeguarding & Child Protection Policy

Tutor Vision Ltd

Policy status: Updated

Policy owner: Tutor Vision Ltd

Designated Safeguarding Lead (DSL): Tim Pattison

Safeguarding contact email / telephone: safeguarding@tutor-vision.co.uk

Where cover arrangements are in place, the effective cover will access this e-mail account.

Effective / approval date: 07 September 2026

Next scheduled review: 07 September 2027

Earlier review triggers: Change in law/guidance; safeguarding incident; Local Authority/commissioner requirement; material service change; identified practice gap

Applies to: Directors, employees, self-employed tutors, contractors, volunteers and anyone working on behalf of Tutor Vision Ltd

1. Purpose, status and scope

Tutor Vision Ltd is committed to safeguarding and promoting the welfare of children and expects every person working on its behalf to share that commitment. Safeguarding is everyone's responsibility. The welfare and best interests of the child are the primary consideration when Tutor Vision makes safeguarding decisions.

This policy establishes the minimum safeguarding framework for Tutor Vision's private tuition, school-commissioned tuition and Local Authority-commissioned alternative provision (AP), whether delivered online, in person, at a family home, at a school or Local Authority venue, or at another agreed location.

Tutor Vision Ltd is not a school or college merely because it provides tutoring or non-school alternative provision. Keeping Children Safe in Education (KCSIE) 2026 is statutory guidance for schools and colleges. Tutor Vision nevertheless adopts the relevant KCSIE 2026 standards as a safeguarding benchmark and contractual operating standard, alongside the requirements of commissioners and the Department for Education's non-school alternative provision standards.

- A child means anyone under the age of 18.
- This policy applies to directors, employees, self-employed tutors, contractors, volunteers and any person delivering or supporting Tutor Vision services.
- Where a commissioner has stricter safeguarding requirements, Tutor Vision will comply with those requirements provided they are lawful and do not reduce the protections in this policy.
- Safeguarding concerns involving an adult at risk must also be escalated promptly under the relevant adult safeguarding arrangements; this policy is primarily concerned with children.

2. Safeguarding principles

- Children have a right to be safe from abuse, neglect, exploitation, discrimination and avoidable harm.
- Safeguarding is child-centred: Tutor Vision will consider the child's wishes and feelings, age, development, communication needs and lived experience while taking action necessary to protect them.
- Concerns do not require proof before they are reported. A reasonable concern, disclosure, pattern, professional unease or unexplained change may be enough to require action.
- Children can be harmed by adults or other children, in person or online, inside or outside education.
- No confidentiality promise can override the need to share information lawfully to safeguard a child.
- Information will be shared on a lawful, necessary and proportionate basis, with a clear record of what was shared, with whom, why, and the decision made.
- Tutor Vision will work with parents, carers, schools, Local Authorities, children's social care, police, health and other safeguarding partners where appropriate.
- Professional curiosity, respectful challenge and timely escalation are expected where information is incomplete, inconsistent or raises risk.

3. Underpinning law and guidance

This policy is informed by the following legislation and guidance, as amended from time to time:

- Children Act 1989 and Children Act 2004;
- Working Together to Safeguard Children 2026;
- Keeping Children Safe in Education 2026 (used by Tutor Vision as an alignment benchmark and, where required, by commissioners);
- Information sharing to safeguard children and young people - statutory guidance updated September 2026, including the information sharing duty coming into force on 30 September 2026 where applicable;
- Non-school Alternative Provision: Voluntary National Standards (DfE, 2025);
- UK GDPR and Data Protection Act 2018, as amended including relevant changes under the Data (Use and Access) Act 2025;
- Safeguarding Vulnerable Groups Act 2006 and current DBS/regulated activity guidance;
- Sexual Offences Act 2003; Female Genital Mutilation Act 2003; Forced Marriage (Civil Protection) Act 2007; Modern Slavery Act 2015; Domestic Abuse Act 2021;
- Counter-Terrorism and Security Act 2015 and Prevent Duty Guidance 2023, where the duty applies to a commissioner or setting;
- Equality Act 2010 and Children and Families Act 2014 where relevant to the child's needs and provision.

4. Governance, accountability and safeguarding leadership

4.1. Designated Safeguarding Lead

Tutor Vision will appoint a Designated Safeguarding Lead (DSL) with sufficient authority, competence, time and access to senior decision-makers. The DSL is responsible for coordinating safeguarding action, advice, referrals, records, liaison with commissioners and external agencies, training oversight and annual policy review.

- The DSL must complete safeguarding lead training appropriate to the organisation and refresh/update knowledge regularly.
- An effective cover arrangement must be available so safeguarding action is not delayed when the DSL is unavailable.
- If the concern is about the DSL, it must be reported to the alternative senior safeguarding contact. If both routes are compromised or a child is at immediate risk, the reporter must contact the appropriate statutory agency directly.

4.2. Directors and senior management

- approve and review this policy and associated procedures;
- ensure sufficient safeguarding resources, training and oversight;
- ensure safer recruitment and suitability arrangements are effective;
- review safeguarding themes, incidents, low-level concerns and organisational learning at an appropriate level without unnecessary disclosure of personal data;

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- ensure commissioned AP arrangements have clear responsibilities for referral information, attendance, incidents, safeguarding communication and review.

5. Training, induction and policy awareness

- All tutors and staff must receive safeguarding induction before working unsupervised with children and must know the identity/contact route for the DSL and effective cover.
- Tutors working with children through school or Local Authority commissioned provision must read KCSIE 2026 Part One in full where Tutor Vision or the commissioner requires this, and must follow the commissioner's safeguarding arrangements in addition to this policy.
- Safeguarding training will be refreshed at least annually at Tutor Vision level, with additional updates when risks, guidance, law or practice change.
- Training will cover abuse and neglect, child-on-child abuse, online harm, exploitation, domestic abuse, radicalisation, professional boundaries, disclosures, information sharing, recordkeeping, allegations/low-level concerns and AP attendance risks.
- Completion and policy acknowledgements will be recorded.

6. Safer recruitment and ongoing suitability

Tutor Vision's Recruitment and Selection Policy provides the detailed process. Safeguarding requirements include identity and suitability checks, appropriate DBS checks according to legal eligibility and assignment requirements, references, qualifications/experience verification where relevant, right-to-work checks where applicable, safeguarding expectations at interview/onboarding and continuing disclosure obligations.

- No tutor may start a child-facing assignment until Tutor Vision confirms that required checks and approvals are complete.
- A substitute proposed by a self-employed contractor must not work with a learner until Tutor Vision has completed and approved the same relevant safeguarding and suitability checks.
- Any arrest, caution, charge, conviction, barring decision, professional-conduct matter or other circumstance that may affect suitability must be reported immediately to Tutor Vision.
- Where the legal threshold for a Disclosure and Barring Service referral is met, Tutor Vision will make the required referral and cooperate with relevant agencies.

7. Professional boundaries and expected conduct

Every adult working with a child through Tutor Vision occupies a position of trust or influence. Tutors must recognise the inherent imbalance of power and must not use that position for personal advantage, gratification, intimidation, coercion or to develop an inappropriate relationship.

- Use only Tutor Vision-approved or commissioner-approved communication channels. Do not move communication with a child to personal email, phone, private messaging, gaming or social-media accounts.
- Do not share or request personal contact details with a child except where expressly authorised for a lawful operational reason and approved by Tutor Vision.

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- Do not meet a child outside the agreed tutoring arrangement, transport a child, give inappropriate gifts, or form a private social relationship with a learner.
 - Do not use sexualised, humiliating, discriminatory, threatening, coercive or otherwise inappropriate language or material.
 - Do not record, photograph, screenshot or capture a child or session unless Tutor Vision has expressly authorised the processing and the necessary safeguards/transparency are in place.
 - Report misunderstandings, boundary incidents, unusual contact, inappropriate approaches and low-level concerns rather than attempting to manage them privately.
 - Where professional judgement is required, actions should be warranted, proportionate, safe, equitable and capable of being explained and recorded.

8. Online tuition, technology and artificial intelligence

- Online sessions must use an approved platform or a commissioner-approved system and take place in a professional environment.
- Tutors must prevent unauthorised people from viewing or hearing sessions and should minimise or hide personal information when screen sharing.
- Resources, links, videos, websites and digital tools must be age-appropriate and educationally suitable.
- Tutors must not expose children to harmful, sexual, extremist or otherwise inappropriate content. Where such content appears unexpectedly, the tutor should pause/end the session if needed and report the concern.
- Personal data or safeguarding information must not be entered into generative AI tools unless Tutor Vision has specifically approved the tool, purpose and data-protection safeguards. Identifiable safeguarding disclosures must never be put into a public AI service.
- AI output must not replace safeguarding judgement. Any content or interaction indicating risk of abuse, exploitation, self-harm, radicalisation or other harm must be treated as a safeguarding concern and escalated to a human safeguarding lead.
- Account credentials, passwords and access links must be kept secure. Suspected compromise or unauthorised access must be reported immediately as both a security and, where relevant, safeguarding/data-protection incident.

9. Recognising safeguarding concerns and forms of harm

Safeguarding concerns may arise from a disclosure, observed behaviour, attendance pattern, online interaction, information from a parent/commissioner, a child's presentation or a combination of small indicators. Staff and tutors do not diagnose abuse and do not investigate. They notice, listen, record and report.

- physical abuse;
- emotional abuse;
- sexual abuse;
- neglect;

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- child-on-child abuse, including bullying, cyberbullying, prejudice-based/discriminatory bullying, sexual violence, sexual harassment and abuse in intimate relationships between children;
 - child sexual exploitation (CSE) and child criminal exploitation (CCE), including county lines;
 - domestic abuse and coercive control affecting a child;
 - serious violence and gang-related harm;
 - grooming, online abuse and technology-facilitated abuse;
 - consensual or non-consensual sharing of nude or semi-nude images involving children;
 - honour-based abuse, female genital mutilation and forced marriage;
 - modern slavery and trafficking;
 - radicalisation and susceptibility to terrorism;
 - self-harm, suicidal thoughts or serious mental-health concerns where these indicate safeguarding risk;
 - fabricated or induced illness, discriminatory abuse, hate incidents, and other circumstances in which a child may be unsafe.

10. Child-on-child abuse

Tutor Vision adopts a zero-tolerance approach to child-on-child sexual violence and sexual harassment in the sense that it is never accepted as normal, inevitable or "banter". A zero-tolerance approach does not mean automatic punitive action; responses must be safeguarding-led, proportionate, child-centred and sensitive to the needs and safety of all children involved.

- Reports are taken seriously even where there are no witnesses or the alleged behaviour occurred outside Tutor Vision sessions.
- The wishes of the child who has reported harm should be considered, but they cannot determine whether necessary safeguarding action is taken.
- Children alleged to have harmed another child may themselves have safeguarding needs. Risk management and support should consider all affected children.
- Where behaviour may constitute a crime or significant harm, the DSL will seek advice and refer to children's social care and/or police as appropriate.

11. Attendance, absence and Alternative Provision

For school or Local Authority commissioned AP, attendance is both an educational and safeguarding matter. Tutor Vision will maintain accurate session attendance records and follow the commissioner's agreed absence/escalation arrangements.

- Where a child expected for a commissioned session does not attend or cannot be contacted through the agreed route, the tutor must report the non-attendance promptly to Tutor Vision and follow the placement-specific escalation instructions.
- Tutor Vision will notify the commissioner/placing school or Local Authority on the same working day where required by the placement arrangement, and without delay where absence creates an immediate safeguarding concern.

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- Repeated, unexplained or unusual patterns of absence, disengagement or inability to locate a child must be treated as potential safeguarding indicators and escalated to the DSL.
 - Tutor Vision will not assume that another agency has acted. Where the organisation believes a child is at risk and appropriate action is not being taken, the DSL will escalate or refer directly in accordance with local safeguarding arrangements.
 - Commissioners are expected to provide relevant safeguarding, SEND, medical, risk and emergency-contact information necessary for safe provision before or at the start of placement and to update Tutor Vision when material information changes.

12. Responding to a disclosure or concern

If a child discloses abuse, harm or risk, or a tutor observes something concerning, the adult must:

1. Stay calm and listen carefully.
2. Take the child seriously and allow them to speak in their own words.
3. Reassure the child that speaking up was the right thing to do, without making promises about outcomes.
4. Never promise secrecy. Explain that information may need to be shared with people who can help keep them safe.
5. Do not ask leading, repeated or investigative questions. Use only minimal open prompts where necessary to clarify immediate safety.
6. Do not confront the alleged perpetrator or attempt to investigate.
7. Take immediate protective action where required. If there is immediate danger or a life-threatening emergency, call 999.
8. Make a factual record as soon as possible, distinguishing what was observed, what was said, what was reported by others and any professional opinion.
9. Report the matter immediately to the DSL/effective cover or, where necessary, directly to the appropriate statutory agency.

13. Safeguarding reporting, referrals and escalation

13.1. Internal reporting

All safeguarding concerns, disclosures, incidents, low-level concerns and allegations must be reported promptly through Tutor Vision's approved safeguarding route. A written concern form does not replace urgent verbal escalation.

13.2. External referral

The DSL will decide what external action is required after considering immediate safety, the nature of the concern, local safeguarding arrangements, commissioner information and relevant statutory guidance. Where a child is suffering or likely to suffer significant harm, a referral to children's social care should be made immediately; police should also be contacted where appropriate.

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- Any person may make a direct referral to children's social care or police if necessary. Concerns must not be delayed because the DSL is unavailable or because another organisation is assumed to be dealing with the matter.
 - If a referral is not accepted or the response does not address the identified risk, the DSL will use local escalation arrangements and professional challenge as appropriate.
 - For concerns about radicalisation, Tutor Vision will follow safeguarding procedures and cooperate with the commissioner's Prevent arrangements. Where applicable, the DSL may seek advice or make a Prevent referral through the relevant process.

13.3. FGM

All concerns about female genital mutilation must be reported to the DSL. Where the statutory mandatory reporting duty applies to a particular professional and a girl under 18 discloses that FGM has been carried out on her, that professional must also make the required direct report to the police in accordance with the law and guidance. Suspicion or risk of FGM remains a safeguarding concern requiring DSL action even where the mandatory direct-reporting duty is not triggered.

14. Information sharing, confidentiality and data protection

Fears about data protection must not prevent lawful safeguarding action. Tutor Vision will share information where this is lawful, necessary and proportionate to safeguard or promote a child's welfare, taking account of the September 2026 statutory information-sharing guidance and applicable data-protection law.

- Consent is not always required for safeguarding information sharing. Staff must seek DSL advice where uncertain rather than withholding information solely because consent has not been obtained.
- Information should be relevant, adequate, accurate, timely and limited to what is needed for the safeguarding purpose.
- The record must state what information was shared or withheld, with whom, on what basis, the reason for the decision and any next action.
- Where informing a parent/carer could increase risk to the child, compromise a police/social-care enquiry or otherwise be unsafe, Tutor Vision will seek statutory-agency advice before doing so.
- Safeguarding records will be stored securely with restricted access and kept separate from routine teaching notes wherever practicable.
- Where Tutor Vision is acting for a school or Local Authority, information-sharing and record-transfer arrangements in the placement/commissioning agreement will also be followed.

15. Safeguarding records

- Records must be clear, factual, dated, timed where relevant and attributable to the person making the record.

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- Record the child's own words where relevant and avoid unnecessary interpretation.
 - Distinguish observed fact, information reported by another person, historical information and professional opinion.
 - Record actions, decisions, advice received, referrals, people informed, reasons for sharing or not sharing information and outcomes known to Tutor Vision.
 - Do not store safeguarding material in personal notebooks, personal email accounts, private messaging apps or unauthorised devices/systems.
 - Retention and disposal will follow Tutor Vision's Data Protection & Privacy Policy and retention schedule, taking account of safeguarding and legal needs.

16. Inappropriate sexual images and harmful content

If a tutor becomes aware of suspected child sexual abuse material, nude or semi-nude imagery involving a child, or other illegal sexual content, the priority is to avoid creating further copies and to preserve safety and evidence.

- Do not intentionally view, download, copy, screenshot, forward, print, save or share suspected illegal images.
- Do not ask the child to send the image or show it again.
- Do not delete or alter material on a device where doing so may interfere with evidence; secure the situation and seek DSL/police advice.
- End or pause the session where necessary to protect the child or prevent further exposure.
- Report immediately to the DSL and contact police/999 where there is immediate danger or urgent police involvement is required.

17. Allegations about people who work with children

An allegation or concern about a director, employee, tutor, contractor, volunteer or other adult connected with Tutor Vision must be treated as a safeguarding matter where the person has allegedly:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

The concern must be reported immediately to the DSL or designated senior person. If it concerns the DSL, it must go to the alternative senior safeguarding contact. Tutor Vision will seek advice from the Local Authority Designated Officer (LADO) and, where the threshold is met, ensure the LADO/designated officer in the area where the adult works is informed within one working day, in line with Working Together to Safeguard Children 2026 and local procedures.

- The person who is the subject of the allegation must not be confronted or informed in a way that risks the child, witnesses or an investigation before appropriate advice is taken.

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- Tutor Vision may pause, restrict or withdraw assignments as a protective and commercial safeguarding measure while advice or investigation is obtained. This is not a finding of wrongdoing.
 - Police, children's social care, DBS, professional regulators, commissioners and insurers will be informed where lawful, necessary or required.

18. Low-level concerns

A low-level concern is not insignificant. It is any concern, however small, that an adult working on behalf of Tutor Vision may have acted in a way that is inconsistent with the Staff/Tutor Code of Conduct, including inappropriate conduct outside work, but does not appear to meet the harms threshold for LADO referral.

- Examples include over-familiarity, unnecessary private contact, inappropriate comments, boundary blurring, favouritism, unsuitable social-media contact or conduct that causes a sense of unease.
- Low-level concerns must be reported and recorded. Tutor Vision will review them for patterns, context and escalation.
- Where the information suggests the harms threshold may be met, it will be treated as an allegation and LADO advice sought rather than remaining in the low-level process.

19. Whistleblowing and concerns about safeguarding practice

Everyone working for Tutor Vision must be able to raise concerns about unsafe practice, failures to act, suppression of concerns or weaknesses in safeguarding arrangements. Until Tutor Vision's standalone Whistleblowing Policy is approved, concerns should be raised with the Director/DSL or the alternative senior contact. If the concern cannot safely be raised internally, or the response is inadequate, external advice may be sought, including from the NSPCC whistleblowing advice line or the relevant statutory authority.

- No person will be disadvantaged for raising a genuine safeguarding concern in good faith, even if it is not ultimately substantiated.
- Whistleblowing does not replace immediate action where a child is at risk. Emergency or statutory referrals must still be made.

20. Parents, carers, children and commissioners

- Parents, carers and children will be given a clear route to report safeguarding concerns about Tutor Vision services or a tutor.
- A child may report a concern directly to Tutor Vision, their parent/carer, their school/commissioner or a statutory service. Tutor Vision will not require a child to complain through the person about whom they are concerned.
- Where a complaint contains a safeguarding allegation, it will move immediately into safeguarding procedures rather than being handled only as a service complaint.

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- Schools and Local Authorities commissioning AP remain responsible for their own statutory duties. Tutor Vision will cooperate with their safeguarding arrangements and provide timely attendance, incident, progress and safeguarding information as lawfully required.
 - Placement agreements should identify safeguarding contacts, emergency routes, attendance expectations, known risks, information-sharing arrangements, review frequency and escalation processes.

21. Quality assurance, monitoring and organisational learning

- Tutor Vision will review safeguarding concerns, referrals, allegations, low-level concerns, attendance concerns, training completion and policy compliance to identify themes and learning.
- After a significant incident or allegation, Tutor Vision will consider what organisational learning or policy/process change is required, regardless of the outcome for an individual.
- Safeguarding audits may be used for LA/school commissioning assurance. Access to case information will remain restricted to what is necessary.
- This policy will be reviewed at least annually and sooner where law/guidance changes, a safeguarding incident occurs, a commissioner requires change, service delivery materially changes or practice identifies a gap.

22. Emergency and external contacts

The correct local safeguarding contact depends on where the child lives and where the concern arises. Tutor Vision must use the relevant Local Authority children's social care/MASH and LADO arrangements for the case.

Emergency services: 999

Police non-emergency: 101

NSPCC Helpline: 0808 800 5000

Childline: 0800 1111

Local Authority children's social care / MASH: Use the Local Authority area for the child/concern

Local Authority Designated Officer (LADO): Use the Local Authority area where the adult works with children

Tutor Vision DSL: Tim Pattison

Appendix A. Immediate safeguarding action flow

1. NOTICE / RECEIVE A concern, disclosure, incident, attendance issue, online event, allegation or professional unease arises.
2. IMMEDIATE SAFETY If anyone is in immediate danger or urgent medical/police help is required, call 999. Do not delay for paperwork.
3. LISTEN / DO NOT INVESTIGATE Listen calmly, use minimal open prompts, do not promise secrecy and do not confront an alleged perpetrator.
4. REPORT Contact the Tutor Vision DSL/effective cover immediately. If unavailable and risk requires action, contact the relevant statutory agency directly.
5. RECORD Create a factual record promptly: what was seen/heard, child's words, date/time, actions, people informed, decisions and rationale.
6. REFER / SHARE DSL decides on children's social care, police, LADO, Prevent or commissioner referral/liaison. Share lawful, necessary, proportionate information.
7. FOLLOW UP Confirm receipt/outcome where appropriate, escalate if response is inadequate, update safeguarding record and review ongoing risk/support.

Appendix B. Safeguarding Concern Record - minimum fields

- Child's name/identifier and date of birth where known and necessary;
- Date/time/location or online context of incident/concern;
- Name/role of person making the record;
- Exactly what was observed, heard or disclosed, including the child's own words where relevant;
- Source of information and whether it is fact, reported information, historical information or professional opinion;
- Immediate action taken and immediate safety assessment;
- Who was informed and when;
- DSL decision, rationale and advice obtained;
- Information shared or not shared, with whom, legal/safeguarding basis and reason;
- External referrals and reference numbers where available;
- Commissioner/parent/carer notification decision and rationale;
- Follow-up action, outcome and review date.

Appendix C. Policy relationships

This policy should be read alongside the following Tutor Vision documents. Where a document is still being developed, this safeguarding policy remains the controlling safeguarding standard until that document is approved.

- Recruitment and Selection Policy;
- Staff / Tutor Code of Conduct;
- Whistleblowing Policy;
- Complaints Policy;
- Behaviour Management Policy;
- Equality and Diversity Policy;
- Health & Safety Policy;
- Data Protection & Privacy Policy and published Privacy Notice;
- Self-Employed Tutor Contractor Agreement;

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- commissioner-specific safeguarding, attendance and AP placement requirements.

Appendix D. Authoritative guidance referenced

[Department for Education - Keeping children safe in education 2026](#)

[Department for Education - Working together to safeguard children 2026](#)

[Department for Education - Information sharing to safeguard children and young people](#)

[Department for Education - Non-school alternative provision: voluntary national standards](#)

[Home Office - Prevent duty guidance: England and Wales](#)

[Information Commissioner's Office - Children and the UK GDPR](#)

23. Approval

Approved by: Tim Pattison

Role: Director and Safeguarding Lead

Date: 07 September 2026

Next review date: 07 September 2027