
Safeguarding & Child Protection Policy

Policy Owner: Directors, AdaptEd Tuition Ltd (Designated Safeguarding Leads)

Approved By: AdaptEd Tuition Ltd Directors

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Designated Safeguarding Leads: Hayley Rollings & Gary Essex

This policy has been revised against Keeping Children Safe in Education 2026, which comes into force on 1 September 2026, and Working Together to Safeguard Children 2026. AdaptEd Tuition Ltd is a tuition provider; where a commissioning school or local authority has additional safeguarding requirements, those requirements will also be followed.

Version 1.0

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1. Policy Statement

AdaptEd Tuition Ltd is committed to safeguarding and promoting the welfare of every child and young person with whom it works. Safeguarding is everyone's responsibility and all staff, tutors, volunteers, contractors and agency workers have a personal responsibility to act when they are concerned about a child's welfare.

The welfare and best interests of children are central to decision-making. AdaptEd Tuition Ltd will maintain a culture of vigilance, professional curiosity, openness and challenge in which concerns are recognised early, reported promptly, recorded accurately and acted upon proportionately.

AdaptEd Tuition Ltd recognises that children may experience abuse, neglect, exploitation or other harm in the home, in education, in the community, through peer relationships or online. Children may experience more than one form of harm at the same time. Safeguarding practice will therefore be child-centred, trauma-informed, inclusive and sensitive to individual circumstances.

Where organisational interests conflict with the safety or welfare of a child, the child's welfare takes priority. AdaptEd Tuition Ltd will work openly and lawfully with schools, local authorities, children's social care, the police, health professionals, parents and carers, and other safeguarding partners.

2. Purpose, Status and Scope

2.1 Purpose

This policy provides the framework through which AdaptEd Tuition Ltd will:

- protect children from abuse, neglect, exploitation and other forms of harm;
- identify concerns at the earliest opportunity and respond promptly;
- ensure every worker understands their safeguarding duties and reporting responsibilities;
- provide clear arrangements for one-to-one, small-group, online, home, school-based and alternative provision tuition;
- support lawful and proportionate information sharing;
- promote safe professional boundaries and safer working practices;
- manage allegations, concerns about adults and low-level concerns consistently;
- maintain effective safeguarding governance, training, recording and quality assurance.

2.2 Statutory and Regulatory Context

KCSIE 2026 is statutory guidance for schools and colleges and comes into force on 1 September 2026. AdaptEd Tuition Ltd is not a school or college; this policy therefore adopts KCSIE 2026 as a safeguarding benchmark and applies relevant expectations proportionately to AdaptEd Tuition Ltd's role as a tuition and education provider. Where AdaptEd Tuition Ltd works on school premises, for a school, or under a local authority commission, it will also comply with the safeguarding procedures and contractual requirements of the commissioning organisation.

This policy is also informed by Working Together to Safeguard Children 2026, relevant Prevent guidance, the Data Protection & Privacy Policy, the Whistleblowing Policy, data protection legislation and other applicable safeguarding law and guidance.

2.3 Scope

This policy applies to:

- Directors and managers;
- Designated Safeguarding Leads (DSLs);
- employees and tutors;
- agency staff, contractors and volunteers;
- placement students and anyone else working on behalf of AdaptEd Tuition Ltd.

It applies to all learners receiving AdaptEd Tuition Ltd's services, including:

- online tuition;
- face-to-face tuition;
- home tuition;
- school-based tuition;
- alternative provision;
- one-to-one and small-group tuition.

3. Safeguarding Principles

- The welfare of the child is paramount.
- Safeguarding is everyone's responsibility.
- Every child has the right to feel safe, listened to and respected.
- Children's wishes and feelings should be heard and taken seriously, consistent with their age and understanding.
- Concerns must be acted on promptly; staff, tutors and directors must never assume someone else has reported them.
- Professional curiosity should be maintained where information is incomplete, inconsistent or concerning.
- Children with SEND, disabilities or communication needs may face additional barriers to disclosure and must not be disadvantaged by assumptions about their behaviour or presentation.
- Children may experience multiple or simultaneous harms; one concern must not cause other risks to be overlooked.
- Safeguarding practice must be inclusive, anti-discriminatory and respectful of identity, culture, faith, disability and family circumstances.
- Safeguarding information and personal data will be handled lawfully, fairly, transparently, securely, proportionately and only for authorised purposes.
- Only information necessary to fulfil educational, safeguarding, legal, contractual or other legitimate responsibilities will be collected, accessed, used, shared or retained.
- Safeguarding records will be accurate, factual, timely, secure and accessible only to authorised individuals who require the information for their role.
- Safe working practices protect children and staff and must be embedded in everyday tuition.

4. Roles and Responsibilities

4.1 Directors

- hold overall organisational accountability for safeguarding;
- ensure safeguarding is a strategic priority and adequate resources are available;

- ensure appropriate policies, procedures, training and quality assurance arrangements are in place;
- ensure safeguarding risks are identified, monitored and reviewed;
- regularly review and monitor safeguarding reports as DSLs.
- ensure safeguarding information is managed consistently with the Data Protection & Privacy Policy;
- ensure the policy is reviewed when legislation, statutory guidance or organisational circumstances change.

4.2 Designated Safeguarding Leads

AdaptEd Tuition Ltd's DSLs are:

- **Hayley Rollings & Gary Essex**
Email: admin@adaptedtuition.org
Phone: 07848 099801

The DSLs will:

- act as a source of safeguarding advice, support and expertise;
- receive and assess safeguarding concerns;
- make or coordinate referrals to children's social care, the police, Prevent/Channel, LADO and other agencies where appropriate;
- liaise with commissioning schools and safeguarding partners;
- ensure safeguarding records are accurate, secure and appropriately reviewed;
- ensure safeguarding information is shared and transferred safely, including where a learner moves between providers or settings;
- support staff who make referrals and ensure staff know how to escalate concerns;
- monitor low-level concerns and identify patterns;
- ensure allegations against adults are managed in line with the harm threshold and local LADO procedures;
- promote child-centred practice, professional curiosity and learning from safeguarding incidents;
- keep their safeguarding knowledge and training current;
- be Level 3 Safeguarding trained with refresher training every 2 years and attend regular update and training sessions within this 2 year period.

4.3 DSL Availability and Cover

AdaptEd Tuition Ltd will maintain clear arrangements so that a safeguarding concern is not dependent on one person being available. The organisation will maintain a shared safeguarding route and/or alternative contact mechanism and will ensure that staff know who to contact when either DSL is unavailable.

In the unlikely event that both DSLs are unavailable, and a child may be at risk of significant harm, staff/ tutors **must** contact the relevant children's social care service or

the police directly as appropriate and inform AdaptEd Tuition Ltd as soon as it is safe to do so. Contact details are available in Appendix E.

4.4 All Staff and Tutors

- All staff and tutors working for AdaptEd Tuition Ltd are required to complete our safeguarding induction and training. Prior to commencing any work, all staff and tutors must complete and sign the required Safeguarding Declaration Form and successfully complete the appropriate safeguarding training.
- know the identity and contact arrangements for the DSLs;
- recognise indicators of abuse, neglect, exploitation and other harm;
- report concerns immediately and record them promptly;
- maintain professional boundaries and follow the Tutor Code of Conduct;
- cooperate with safeguarding referrals and investigations;
- challenge unsafe practice and report low-level concerns;
- never promise secrecy or confidentiality where a safeguarding concern exists;
- maintain confidentiality and follow the Data Protection & Privacy Policy when handling learner information;
- report suspected data protection or cybersecurity incidents immediately to a Director, in line with the Data Protection & Privacy Policy.

5. Recognising Safeguarding Concerns

Safeguarding concerns may arise from a disclosure, an observation, a change in behaviour, a pattern of missed tuition, information received from another professional, online activity, a concern raised by a child or parent, or a combination of information. Staff should not wait for proof before reporting a concern.

5.1 Abuse and Neglect

AdaptEd Tuition Ltd recognises the principal forms of abuse and neglect as:

- physical abuse;
- emotional or psychological abuse;
- sexual abuse, including online and non-contact abuse;
- neglect;
- domestic abuse and the impact of domestic abuse on children;
- child sexual exploitation (CSE);
- child criminal exploitation (CCE), including county lines;
- modern slavery and trafficking;
- honour-based abuse, forced marriage and FGM;
- abuse within child or teenage intimate relationships;
- peer-on-peer / child-on-child abuse;
- online harms and technology-facilitated abuse.

5.2 Indicators

Indicators may include unexplained injuries, changes in presentation or behaviour, fearfulness, withdrawal, sexualised behaviour, age-inappropriate sexual knowledge, poor hygiene, persistent hunger, unexplained money or gifts, missing episodes, multiple phones, association with older individuals, changes in attendance, sudden disengagement, self-harm, suicidal thoughts, or concerning online activity. Indicators are not proof of abuse and must be considered in context.

5.3 Professional Curiosity

Staff/ tutors should remain professionally curious when explanations do not fully account for what they observe, when patterns recur, or when a child appears unusually fearful, withdrawn or controlled. Professional curiosity means seeking appropriate clarification through the DSL and safeguarding partners; it does not mean investigating the child or alleged perpetrator.

5.4 Specific Safeguarding Risks

AdaptEd Tuition Ltd will remain alert to CSE, CCE, county lines, serious violence, weapons, domestic abuse, radicalisation, honour-based abuse, FGM, forced marriage, trafficking, modern slavery, child sexual abuse, teenage relationship abuse, harmful sexual behaviour, self-harm, suicide risk and online harms.

6. Child-on-Child Abuse, Harmful Sexual Behaviour and Serious Violence

Children can abuse other children. Child-on-child abuse will never be dismissed as banter, horseplay, teasing, growing up, or simply part of a relationship. All reports are taken seriously and assessed individually.

Child-on-child abuse can include:

- bullying, including cyberbullying;
- sexual harassment and sexual violence;
- harmful sexual behaviour;
- coercive, controlling or abusive behaviour within intimate or dating relationships;
- sharing, or threatening to share, nude or semi-nude images, including AI-generated or manipulated intimate images (deepfakes);
- physical assault, serious violence, weapon-related incidents or threats of violence;
- hazing, initiation practices or other acts intended to humiliate, intimidate or degrade;
- misogynistic, sexist, racist, homophobic, transphobic, ableist or other discriminatory abuse.

The DSLs will consider the safety and welfare of all children involved, including the child reporting the concern, the alleged perpetrator and any other children who may be affected. Where appropriate, specialist advice or referral will be sought. The response

will be proportionate, child-centred and informed by the circumstances, age and developmental stage of the children involved.

7. Children at Increased Risk and Contextual Safeguarding

Some children may face additional barriers to safety or may be exposed to heightened risks. This includes children who:

- have SEND or an EHCP;
- are looked after or previously looked after;
- have a social worker or are subject to a child protection or child in need plan;
- are young carers;
- experience mental health difficulties;
- are affected by domestic abuse;
- are persistently absent or missing from education;
- are vulnerable to CSE, CCE, county lines or serious violence;
- are refugees, asylum seekers or otherwise newly arrived;
- are experiencing homelessness or housing instability;
- have experienced trauma or adverse childhood experiences;
- are vulnerable to discrimination or abuse because of identity or personal circumstances;
- have a parent or close family member in custody.

Safeguarding must not be based on stereotypes. Staff/ tutors should consider the individual child's circumstances and the wider context in which harm may occur, including peer groups, communities, online environments, family relationships and the places where tuition takes place.

8. Safe Working Practices

8.1 Professional Boundaries

- Maintain appropriate professional relationships at all times.
- Use approved communication channels.
- Do not communicate through personal social media accounts.
- Do not exchange personal gifts or personal contact details.
- Do not arrange private meetings outside agreed tuition arrangements.
- Avoid favouritism, secrecy, inappropriate familiarity or behaviour that could be perceived as grooming.
- Report boundary concerns, including concerns about a staff/tutor's own conduct, promptly.

8.2 One-to-One Tuition

- Tuition must take place in an appropriate, agreed and reasonably safe environment such as the home, a community space (e.g. library or community hub) or online.
- A responsible adult must be in the same building as the tutor and learner and any doors to be left open.
- Tutors must follow any learner-specific risk assessment or safeguarding plan provided by the commissioning organisation.
- Tutors must know how to contact AdaptEd Tuition Ltd if a concern arises.
- Tutors must not transport learners unless this has been specifically authorised under AdaptEd Tuition Ltd's procedures.
- Tutors must not invite learners into their own home or arrange unapproved meetings.

8.3 Home Tuition

- Home tuition must be subject to appropriate risk assessment and clear arrangements with the family and/or the commissioning organisation.
- A responsible adult should be present in the property unless an alternative arrangement has been risk assessed and authorised.
- Tutors must leave a property immediately and seek advice from the DSL's if they feel unsafe.
- Tutors must not become involved in family disputes or enter areas of the home unrelated to the agreed tuition unless they have permission from the family to use the bathroom facilities.

8.4 Online Tuition

- Use approved platforms and organisational accounts only. The Data Protection & Privacy Policy identifies Pencil Spaces via Tutorcruncher.
- Maintain an appropriate professional environment and appearance.
- Use professional language and age-appropriate content.
- Do not ask learners to keep secrets or disable agreed safeguarding controls.
- Do not record sessions unless authorised and the required notification/consent arrangements are in place in accordance with the Privacy Notice and Data Protection & Privacy Policy.
- Report inappropriate messages, images, contact attempts or online behaviour to the DSLs.

8.5 School-Based Tuition

- When working in a school, tutors must comply with the school's safeguarding, visitor, behaviour, health and safety and reporting procedures.

- Concerns about a learner should be reported without delay to the school's DSL in accordance with the school's arrangements and to an AdaptEd Tuition Ltd's DSL.

8.6 Alternative Provision

- Adopt a trauma-informed and relational approach.
- Understand relevant learner risk assessments and safeguarding plans.
- Maintain regular communication with the commissioning school or local authority.
- Monitor attendance and engagement and report concerning changes promptly.
- Remain alert to exploitation, missing education, serious violence, weapons, criminal involvement, mental health and online harms.
- Escalate immediately if the placement becomes unsafe or the learner cannot be safely located.

8.7 Physical Contact, Photography and Recording

- Physical contact should be necessary, proportionate, appropriate and in the child's best interests.
- Any physical intervention must be recorded and reported in accordance with organisational procedures.
- Staff/ tutors must not use personal devices to photograph learners or share learner images through personal messaging or social media.
- If staff/ tutors are required to take photographs of learners' work, they are to ensure the learner is not in the photograph and once the photo is uploaded to Tutorcruncher, the photograph is deleted on the staff/tutors device.
- Staff/ tutors must never copy, forward or store any images of children.

8.8 Mobile Phones, Devices and Confidentiality

- Personal devices must not be used in ways that compromise safeguarding or confidentiality.
- Learner information must not be stored on unsecured personal devices.
- Staff/ tutors must follow the Data Protection and Confidentiality Policy and organisational information-security requirements.
- Access to personal data must be limited to authorised individuals who require it to perform their role.

9. Online Safety, AI and Digital Technologies

Online safety is an integral part of safeguarding. AdaptEd Tuition Ltd recognises that online harms may include grooming, cyberbullying, sexual exploitation, pornography, self-harm and suicide content, extremist material, misogyny, racism and other discriminatory content, misinformation and disinformation, financial scams, harmful challenges, gaming-related risks and technology-facilitated abuse.

9.1 Artificial Intelligence

AI can create additional safeguarding risks. AdaptEd Tuition Ltd will remain alert to AI-generated or manipulated content, including sexualised imagery or deepfakes involving children, grooming or manipulation through AI tools, harmful chatbot interactions, inappropriate content and misuse of children's personal information.

- AI must not be used to make safeguarding decisions or replace professional judgement.
- Staff/ tutors must not upload confidential learner information to AI tools unless the use has been authorised and the relevant data protection requirements are satisfied.
- Any concern involving AI-generated sexual imagery, exploitation, grooming or other child safety risk must be reported immediately to the DSL.
- Staff/ tutors must never download, forward, copy or retain child sexual abuse material.
- Where appropriate, AdaptEd Tuition Ltd will work with the commissioning school, police or other safeguarding agencies.

9.2 Filtering and Monitoring

Where AdaptEd Tuition Ltd controls a digital environment (Pencil Spaces) used by learners, it will maintain appropriate filtering and monitoring arrangements proportionate to the service and risk. Their effectiveness will be reviewed at least annually and the review will be recorded. Where a school controls filtering and monitoring, AdaptEd Tuition Ltd will comply with the school's arrangements and promptly report concerns arising from online activity.

9.3 Digital Communication

All learner communications must use approved channels. Staff/ tutors must not use personal social media, private messaging or personal email for tuition-related communication unless expressly authorised for a safeguarding reason. Any inappropriate or concerning communication must be reported.

10. Attendance, Missing Education and Alternative Provision

Changes in attendance, repeated cancellations, unexplained absence, sudden disengagement or inability to contact a learner may be safeguarding indicators. Staff/ tutors must consider whether patterns could indicate neglect, exploitation, mental health concerns, family difficulties or other harm.

- Tutors must record attendance accurately.
- Concerning patterns must be reported to the DSL's promptly.
- Where tuition is commissioned by a school, AdaptEd Tuition Ltd will follow the school's attendance and safeguarding reporting arrangements.

- Where a learner cannot be located or there is an immediate concern about their safety, the DSL will consider whether urgent referral to children's social care or the police is required.
- For Alternative Provision, attendance, engagement and safeguarding information will be communicated to the commissioning organisation in accordance with agreed arrangements.
- Where a learner moves between education providers, relevant safeguarding information will be transferred securely and promptly where lawful and necessary.

11. Responding to Safeguarding Concerns

11.1 If a Child Discloses

- Stay calm and listen carefully.
- Take the child seriously.
- Allow the child to speak freely and avoid unnecessary interruption.
- Use open questions only where clarification is necessary.
- Reassure the child that they have done the right thing by telling someone.
- Explain that the information cannot be kept secret if someone may be at risk of harm.
- Do not promise confidentiality.
- Do not investigate, confront the alleged perpetrator or ask leading questions.
- Record the child's words as accurately as possible and report the concern immediately to the DSLs.

11.2 Immediate Danger and DSL Unavailability

If a child is at immediate risk of serious harm, staff and tutors must contact 999, seek urgent medical help or contact children's social care as appropriate. Emergency action must not be delayed while waiting for DSL approval. If both DSLs are unavailable and a child may be at risk of significant harm, staff and tutors must contact the relevant children's social care service or the police directly and inform AdaptEd Tuition Ltd as soon as it is safe to do so.

11.3 Recording Concerns

1) Concerns are raised directly through Tutorcruncher via the 'Actions' button, which then links to: 'Raise a Safeguarding/ Wellbeing Concern'.

2) The staff/ tutor records: the date, time and lesson (location) and further details in the description box including:

- Who was present.
- Describe what was seen or heard factually.

- Use the child's own words wherever possible.
- Distinguish fact from professional opinion.

3) Submit immediately without delay.

4) An email is sent directly to the DSLs who will then record:

- actions taken,
- advice sought and
- who the concern was reported to.

5) The cases remain active until a resolution is reached. This is recorded with a factual outcome and the resolution is emailed automatically to the reporting staff/ tutor as well as the DSLs.

6) Records are accurate and kept securely via Tutorcruncher.

11.4 Internal Reporting

All safeguarding concerns must be reported immediately to an AdaptEd Tuition Ltd DSL via the organisation's approved safeguarding reporting route as detailed in 11.3. Staff/tutors must not wait until they have gathered evidence or completed further enquiries.

11.5 External Referrals

The DSLs will determine whether a concern requires referral to children's social care, the police, LADO, Prevent/Channel, health, Early Help/Family Help or another agency. Staff/ tutors retain a personal responsibility to act if they believe a child remains at risk and appropriate action has not been taken.

11.6 Working with Parents and Carers

Parents and carers will normally be involved appropriately, but information may be withheld or delayed where sharing would increase the risk of harm, prejudice an investigation, place another person at risk, or where safeguarding professionals advise otherwise.

11.7 Supporting Learners

Following a concern, staff/ tutors should continue to treat the learner respectfully, avoid repeated questioning, follow the DSLs' guidance and maintain appropriate professional boundaries. AdaptEd Tuition Ltd will work with schools and safeguarding partners to support the learner's education, safety and wellbeing.

12. Information Sharing, Confidentiality and Records

Safeguarding information must be shared when it is necessary, appropriate and lawful to protect a child or promote their welfare. Data protection law does not prevent

appropriate safeguarding information sharing. Staff/tutors should seek advice from the DSLs where they are unsure about the lawful basis or proportionality of sharing.

Safeguarding information is personal data and may include special category data. The Data Protection & Privacy Policy identifies safeguarding information, health and welfare information, SEND data, and mental health and wellbeing information as special category personal data. Such information will be processed only where necessary and appropriate safeguards are applied, with access restricted to authorised individuals who require it to fulfil their responsibilities.

This Safeguarding and Child Protection policy must be read alongside the Data Protection & Privacy Policy and Privacy Notice. AdaptEd Tuition Ltd will apply the principles of lawfulness, fairness and transparency, purpose limitation, data minimisation, accuracy, storage limitation, integrity and confidentiality, and accountability when handling safeguarding information.

12.1 Lawful and Proportionate Information Sharing

AdaptEd Tuition Ltd will share personal data only where necessary, appropriate and lawful. Safeguarding information may be shared with schools, Local Authorities, children's social care, police, health professionals, safeguarding partners and other appropriate agencies where required to safeguard a child or meet legal or safeguarding responsibilities.

Where a learner joins, leaves or moves between settings, relevant safeguarding information will be shared securely and promptly where lawful and necessary. Information relating to a safeguarding risk, including risk to others where relevant, must not be omitted merely because it is uncomfortable or difficult to communicate. Information that is not relevant should be omitted or summarised so that the receiving professional can identify key risks and needs.

AdaptEd Tuition Ltd will avoid a single point of failure by maintaining alternative contact arrangements and seeking confirmation of receipt where safeguarding information is transferred. Where information is unclear or incomplete, the relevant professionals should communicate directly to clarify the risk and required action.

12.2 Data Minimisation and Access

- Only information necessary for providing educational services and fulfilling legal, contractual and safeguarding responsibilities should be collected or recorded.
- Staff/tutors must only access information necessary to perform their role.
- Special category safeguarding information must be restricted to authorised individuals who require it for their responsibilities.
- Confidential information must not be shared through unauthorised channels.
- Safeguarding information must be protected against accidental loss, unauthorised access, misuse, alteration, disclosure or destruction.

12.3 Safeguarding Records

Safeguarding records will be stored securely in the organisation's designated safeguarding recording system as described in 11.3 and held securely via Tutorcruncher. Records will be accessible only to authorised personnel, (the DSLs) and other authorised individuals where necessary for their role.

Safeguarding records will be retained only for as long as necessary to fulfil safeguarding responsibilities and legal, regulatory and contractual obligations, in accordance with the Data Protection & Privacy Policy and applicable guidance. The Data Protection & Privacy Policy specifies that safeguarding records are retained for as long as necessary in accordance with safeguarding responsibilities, legal obligations and applicable guidance. When personal data is no longer required, it will be securely deleted or anonymised in accordance with the organisation's records-management arrangements.

12.4 Data Protection and Cybersecurity Incidents

Any actual or suspected personal data breach, loss, unauthorised disclosure, cyber security incident or other data protection concern involving safeguarding information must be reported immediately to a Director in accordance with the Data Protection & Privacy Policy. Staff/tutors should take reasonable steps to contain the incident where this can be done safely, such as recalling an email, securing documents or restricting further access. Safeguarding action must not be delayed where a child is at risk.

12.5 Children's Data and Individual Rights

AdaptEd Tuition Ltd takes additional care with children's personal data and, where appropriate, provides privacy information in age-appropriate language. Safeguarding and educational information will be processed only as necessary to provide educational services, maintain safeguarding standards and meet legal and regulatory responsibilities.

Requests concerning access, rectification, erasure, restriction, portability, objection or withdrawal of consent will be handled under the Data Protection & Privacy Policy and Privacy Notice. A data subject request must not delay urgent safeguarding action. Where disclosure, restriction or deletion could affect safeguarding, legal or other obligations, the request will be considered in accordance with applicable law and the Data Protection & Privacy Policy.

13. Allegations Against Adults and Low-Level Concerns

13.1 Allegations Meeting the Harm Threshold

An allegation may meet the harm threshold where an adult working on behalf of AdaptEd Tuition Ltd 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 in a way that indicates they may pose a risk of harm; or
- behaved in a way that indicates they may no longer be suitable to work with children, including relevant conduct outside work.

Any allegation that may meet the harm threshold must be reported immediately to a DSL. The matter must not be investigated internally before appropriate safeguarding advice has been obtained. The DSL will follow the relevant local authority LADO procedure and cooperate with the police, children's social care and other agencies as required.

13.2 Concerns About a DSL

If the concern relates to one DSL, it must be reported to the other DSL. If it concerns both DSLs or organisational leadership, it must be escalated directly to the appropriate LADO, local safeguarding authority or other relevant safeguarding body. The Whistleblowing Policy also provides routes for concerns involving a Director or where an individual reasonably believes the concern cannot be considered fairly or impartially through the internal process.

13.3 Low-Level Concerns

A low-level concern is any concern, however small, that an adult working for AdaptEd Tuition Ltd may have acted in a way that is inconsistent with the Tutor Code of Conduct or professional standards, or that causes a sense of unease or may indicate a developing pattern.

- inappropriate language;
- unnecessary familiarity;
- minor boundary issues;
- poor professional judgement;
- inappropriate online communication;
- failure to follow safeguarding procedures;
- behaviour that appears to be grooming or could be grooming-related, even if it does not meet the harm threshold.

Low-level concerns must be reported promptly to a DSL, recorded securely and reviewed for patterns. Staff are also expected to self-report where they believe their own conduct may have fallen below expected standards or could be misinterpreted. Low-level concern records will be handled confidentially and securely in accordance with the Data Protection & Privacy Policy.

13.4 DBS Referrals

AdaptEd Tuition Ltd will make referrals to the Disclosure and Barring Service where the statutory criteria are met, including where an individual has been removed from regulated activity or would otherwise have been removed because they harmed or

posed a risk of harm to a child. Resignation will not prevent appropriate safeguarding action or a referral where required.

14. Whistleblowing and Escalation

Staff/tutors must escalate safeguarding concerns where they believe appropriate action has not been taken. The Whistleblowing Policy is the organisation's separate route for raising concerns about suspected wrongdoing, unsafe practice or misconduct and provides additional protections for genuine concerns raised in good faith.

Any safeguarding concern involving a child must be reported immediately in accordance with this Safeguarding & Child Protection Policy and must not be delayed while whistleblowing procedures are followed. Where there is an immediate risk of harm, emergency services and Children's Social Care should be contacted without delay.

Concerns involving a Director or DSL should be managed in accordance with section 13.2 of this policy and the reporting routes in the Whistleblowing Policy. Where the concern involves both Directors, or where there is no suitably independent person available internally, the Whistleblowing Policy provides for referral to the appropriate external authority or prescribed regulator.

AdaptEd Tuition Ltd will not disadvantage an individual for raising a genuine safeguarding concern in good faith. The Whistleblowing Policy provides the organisation's detailed provisions concerning confidentiality, anonymous concerns, protection from retaliation, external reporting and review of decisions.

15. Training, Supervision and Professional Development

- All staff/tutors must receive safeguarding induction before commencing work and sign a declaration to provide a record of this training.
- Safeguarding knowledge must be refreshed regularly and in line with current statutory expectations.
- Training will cover child protection, abuse and neglect, child-on-child abuse, online safety, Prevent, exploitation, professional boundaries, information sharing and reporting procedures, with additional training appropriate to role.
- DSLs will undertake role-specific training (Level 3 and refreshed every 2 years) and keep their knowledge current.
- Prevent training will be completed at a frequency appropriate to role and current guidance.
- Training records will be maintained.
- Supervision, case review and safeguarding updates will be used to support professional curiosity, reflective practice and learning.

16. Governance, Quality Assurance and Policy Review

Safeguarding is a standing organisational priority. As the Directors are the DSLs will they will collectively regularly review and monitor safeguarding incidents, referrals, low-level concerns, allegations, training completion, audit findings, feedback from schools and families, and emerging safeguarding risks.

16.1 Quality Assurance

- review of safeguarding records and referral outcomes;
- audit of training completion;
- review of low-level concerns and patterns;
- tutor observations and supervision;
- feedback from commissioning schools and families;
- review of home tuition and online tuition risk arrangements;
- review of filtering and monitoring where AdaptEd controls the digital environment;
- incident and near-miss reviews;
- review of safeguarding information handling, access controls, retention and data protection incidents;
- annual policy review and review following significant changes in law or guidance.

16.2 Complaints and Learner Voice

Children must have a clear and accessible route to raise concerns about a tutor, another child, the service or their learning environment. A learner may speak to a tutor, another trusted member of staff, a DSL, their parent/carer, their school DSL or another trusted adult. Complaints about tutor conduct will be considered under the Complaints Policy and escalated as a safeguarding allegation where the circumstances meet the relevant threshold.

16.3 Policy Review

This policy will be reviewed at least annually and sooner where significant safeguarding incidents, legislative changes, statutory guidance changes, organisational changes or learning from practice require amendment.

17. Linked Policies and Guidance

- Safer Recruitment Policy
- Staff/ Tutor Code of Conduct
- Online Safety, Cyber Security, AI and Social Media Policy
- Data Protection Policy
- Equality, Diversity and Inclusion Policy
- Health and Safety Policy
- Whistleblowing Policy
- Complaints Policy
- Behaviour Policy

- Lone Working Policy
- Risk Assessment Procedures
- Non-school alternative provision Voluntary National Standards August 2025

18. Legislation and Statutory Guidance

AdaptEd Tuition Ltd will have regard to, and comply with where applicable, current versions of:

- Children Act 1989
- Children Act 2004
- Children and Families Act 2014
- Education Act 2002
- Safeguarding Vulnerable Groups Act 2006
- Equality Act 2010
- UN Rights of the Child (UK law from 1992)
- Childcare Act 2006
- Local Authority Safeguarding and Child Protection Procedures
- Serious Crime Act 2015
- Care Act 2014, where relevant to adults at risk
- Counter-Terrorism and Security Act 2015
- Modern Slavery Act 2015
- Children and Social Work Act 2017
- Data Protection Act 2018
- Domestic Abuse Act 2021
- Online Safety Act 2023
- Changes to Female Genital Mutilation Act 2003 - arising from the Serious Crime Act 2015.
- Multi-agency statutory guidance on female genital mutilation
- Data (Use and Access) Act 2025
- Children's Wellbeing and Schools Act 2026, where applicable
- Keeping Children Safe in Education 2026
- Working Together to Safeguard Children 2026
- Prevent Duty guidance and related Home Office guidance
- Information sharing advice for safeguarding practitioners and applicable statutory information-sharing arrangements
- Guidance for Safer Working Practice for Adults Working with Children and Young People
- SEND Code of Practice
- Children Missing Education guidance
- relevant local safeguarding partnership procedures and local authority guidance

The policy will be interpreted alongside the most recent statutory guidance in force. Where legislation or guidance changes, AdaptEd Tuition Ltd will update this policy and related procedures as necessary.

Appendix A – Safeguarding Reporting Flowchart

SAFEGUARDING CONCERN IDENTIFIED



Is the child at immediate risk of serious harm?

YES → Contact 999 / emergency services or urgent safeguarding services as appropriate → Inform DSL as soon as is safe.

NO → Record factual information on Tutorcruncher platform and report immediately to an AdaptEd Tuition Ltd's DSL.

DSL reviews information → consider:

- No further action (with rationale recorded)
- Monitor / support
- Early Help / Family Help
- Referral to commissioning school DSL
- Children's Social Care
- Police
- LADO
- Prevent / Channel
- Health or other specialist agency

Record the decision, actions, outcome and monitoring arrangements. Escalate if the response is insufficient.

Appendix B – Safeguarding Concern Recording Form on Tutorcruncher

[Profile](#) [Activity](#) [Communications](#) [Reviews](#) [Accounting](#)

Set Availability

Report a Safeguarding/Wellbeing Concern

DELETE

FILE 1675315

Report a Safeguarding/Wellbeing Concern

You're about to submit a Safeguarding/Wellbeing Concern - thank you for taking the time to do this. Please provide as much accurate and detailed information as you can. After submitting the form, you'll be able to upload any relevant documents to help us better understand the situation.

Severity *

Not Severe

When reporting a concern, please choose the level that best reflects the seriousness of the issue so the concern can be handled with the necessary urgency and care.
Not Severe: These are concerns that require attention but do not meet the threshold for external or statutory reporting. They can usually be managed internally. Examples include a student expressing occasional low mood or anxiety about exams, academic frustration or a lack of confidence affecting performance, or minor family stress that doesn't pose an immediate risk.
Severe: These concerns are serious and should be escalated immediately to a senior staff member or appropriate safeguarding authority. Examples include disclosures or signs of physical or emotional abuse, indications of self-harm, evidence of neglect, or any situation where a child appears to be in immediate danger.

Student *

Student

The Student who is involved in or affected by the issue.

Job

job

The job associated with the issue being reported.

Lesson

Lesson

Description *

BT / H / E / P / M / CC

Provide a detailed description of the issue, including all relevant information.

Cancel

Raise Issue

Appendix C – Body Map Guidance

A body map should only be completed where an injury has been observed. Do not ask a child to remove clothing unnecessarily. Do not photograph injuries unless specifically authorised under organisational procedures and lawful.

- Record the location, size, colour, appearance and any relevant observation.
- Record the child's explanation if voluntarily provided; do not interrogate the child.
- Distinguish observation from professional opinion.
- Report the concern immediately to the DSL.

Body Map: use AdaptEd Tuition Ltd's approved body-map template and retain it with the safeguarding record. Use this link to the document: [Appendix C Safeguarding and Child Protection Policy Body Map](#)

Appendix D – Annual Tutor Safeguarding Declaration

All staff/ tutors complete this declaration form before commencing any tutoring work: [Tutor Safeguarding Declaration](#)

Appendix E – Safeguarding Contacts

As AdaptEd Tuition Ltd works with council's across England, the contact list below is for the local council only. A separate contacts for each council's safeguarding teams will be uploaded to a central file so DSL's can access the information quickly.

Role / Service	Contact	Additional Information
Designated Safeguarding Lead	Hayley Rollings	
Designated Safeguarding Lead	Gary Essex	
Safeguarding email	admin@adaptedtuition.org	
Safeguarding telephone	07848 099801	
Safeguarding recording system	Report via Tutorcruncher button as detailed in Appendix B	
Local Authority Children's Social Care	0345 603 7627 (Monday to Thursday 8:45 AM to 5:00 PM; Friday 8:45 AM to 4:15 PM)	Essex County Council Children and Families Hub for advice and referrals

	0345 606 1212 (Emergency Duty Team Out of Hours / Bank Holidays)	
Local Authority Designated Officer (LADO)	03330 139797	Essex County Council LADO
Prevent / Channel	Essex Police Prevent Team: 01245 452196 (Direct line for advice, guidance, and Channel panel queries) National Prevent Advice Line: 0800 011 3764 (Confidential support line staffed by trained specialist officers) National Anti-Terrorist Hotline: 0800 789 321 (To report suspicious activity or immediate extremist threats)	
Police emergency	999	
Police non-emergency	101	
NSPCC Helpline	0808 800 5000	
Childline	0800 1111	

Appendix F – Version History

Version	Date	Author / owner	Summary of changes	Approval
1.0	July 2026	AdaptEd Tuition Ltd.	Version 1.0 Policy	Directors