
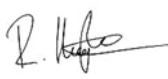

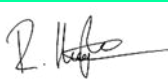

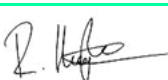

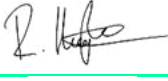

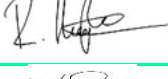




NAME	ROLE	JOB TITLE	TRAINING DATE	CONTACT
Rob Hughes	Designated Safeguarding Lead	Head of Teaching and Learning	12/09/2024	rob.hughes@tute.com safeguarding@tute.com 07743029783
Hollie McFarlane	Deputy Designated Safeguarding Lead	Assistant Head of Teaching and Learning – Inclusion and SEND	12/09/2024	hollie.mcfarlane@tute.com safeguarding@tute.com 07473282727
Report concerns here				

safeguarding@tute.com

POLICY TITLE	Safeguarding
VERSION NUMBER	4.6
APPROVAL DATE	09/09/2024
EFFECTIVE DATE	01/09/2020
POLICY AUTHOR	Vanessa Leach / Rob Hughes
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APPROVED BY	Vanessa Leach / Rob Hughes
STATUS	Revised
DISTRIBUTION	All company
REVIEW CYCLE	Annual

REVIEWS

NAME	ROLE	SIGNATURE	DATE
Vanessa Leach	Managing Director		09/09/2024
Robert Hughes	Head of Teaching and Learning		09/09/2024
Vanessa Leach	Managing Director		06/11/2023
Robert Hughes	Head of Teaching and Learning		06/11/2023
Vanessa Leach	Managing Director		21/08/2023
Robert Hughes	Head of Teaching and Learning		21/08/2023
Vanessa Leach	Managing Director		01/07/2022
Robert Hughes	Head of Teaching and Learning		01/07/2022
Vanessa Leach	Managing Director		01/07/2021
Robert Hughes	Head of Teaching and Learning		01/07/2021
Vanessa Leach	Managing Director		01/07/2020
Robert Hughes	Head of Teaching and Learning		01/07/2020

DETAILS OF POLICY UPDATES

DATE	DETAILS
30.01.2025	<p>Added related policies:</p> <ul style="list-style-type: none"> • Risk management policy • Risk assessment policy • Student health and safety policy <p>Added sections:</p> <ul style="list-style-type: none"> • 13.9 Risk management and assessment • 13.10 Student health and safety

	<p>Update to Section 12.4</p> <ul style="list-style-type: none"> Central student risk register replaces the High Alert Students (HAS) register, which consolidates safeguarding risks, non-standard requests, and other critical student information into a structured, centralised system
08/01/2025	<p>Added 7.6 Extra-familial harms</p> <p>Update to 9 Training: safeguarding training requirements listed</p> <p>Update to 5 Statutory guidance 'The Equality Act (2010)'</p>
03/12/2024	<p>Added 13.6 Web cam use</p> <p>Added 13.8 Online safety for students</p> <p>Expanded 16.5 Making an allegation to include further details on "Managing allegations against people in positions of trust"</p>
04/11/2024	<p>Changes to safeguarding team effective from 04/11/2024</p> <p>Update to DSL: Rob Hughes from Vanessa Leach</p> <p>Update to DDSL: Hollie McFarlane from Rob Hughes</p> <p>Added Student Support Associate, Lauren Livesey, to team</p>
23/10/2024	<p>Added 18.1 Disagreement on referrals</p>
09/09/2024	<p>Changes made following review of Keeping Children Safe in Education (KCSIE) 2024.</p> <ul style="list-style-type: none"> References to KCSIE updated from 2023 to 2024 Abuse and neglect updated to abuse, neglect and exploitation throughout Appendix C: updated definitions in line with Working Together to Safeguard Children from 2023, including "where they see, hear, or experience its effects" when referring to domestic violence. 8.3: text added to clarify school remains responsible for the pupils they place in alternative provision 16.4: text added unexplainable and/or persistent absences from education as a safeguarding risk 17: text added - to comply with DPA/UKGDPR requirements Appendix A: links added to NSPCC advice on protecting children with SEN; and deaf/disabled children and young people <p>Further updates:</p> <ul style="list-style-type: none"> Updated: 7.2 definitions of safeguarding Updated: references to Working Together to Safeguard Children from 2018 to 2023 Updated: references to behaviour policy changed to communications policy

	<ul style="list-style-type: none"> Added: 12.4 – Safeguarding risk register for high alert students Added: 16.6 Parent commissioned lessons Level 3 DSL training date updated for Rob Hughes Updated 11 role of DSL: safeguarding coordinator added to safeguarding team Appendix F: Learning Cloud default slide updated
06/11/2023	<p>Sections added</p> <ul style="list-style-type: none"> 7.5 Special educational needs, disabilities or health issues 15.5 Prejudice behaviour <p>Appendix added</p> <ul style="list-style-type: none"> 24 Appendix F – Learning Cloud default slide
02/09/2023	<p>Update to Deputy DSL to Robert Hughes from Phil Eastman effective 1st September 2023</p> <p>Updated training dates for DSL team</p> <p>Changes made following review of Keeping Children Safe in Education 2023 amendments:</p> <ul style="list-style-type: none"> Added additional staff responsibility to ensure understanding of our monitoring and filtering of posts within our platform and our DSLs duty to report these concerns. (s12.2 & S13.2) Added information about a platform feature of restricting access to lesson recordings (s13.2) Enhanced the information on arranged marriage (s22 – appendix D) Change of terminology throughout policy as per KCSiE: Change of pupils to: ‘pupils or students’ Change from ‘discipline’ to ‘sanction’ Change from: ‘vulnerable’ to ‘susceptible’ Section added: 13.5 Filtering and monitoring Section added: 16.3 Children absent from education Section 14 Security of Tute’s online classroom and platform updated to reflect updates to KCSiE reference to ‘meeting digital and technology standards in schools and colleges’ <p>Further updates:</p> <ul style="list-style-type: none"> Removed: 16.4 reporting attendance <ul style="list-style-type: none"> <i>During a lesson, teachers must note the absence of a child. If a child is absent for two consecutive lesson, teachers must</i>

	<p><i>complete a secure online form.</i>—No longer required due to the improvements in the platform.</p> <ul style="list-style-type: none"> • Tute Spaces renamed as Tute Bases • Appendix B – process updated to reflect change in safeguarding team
01/09/2022	<p>Changes made following review of Keeping Children Safe in Education 2022 amendments:</p> <ul style="list-style-type: none"> - Added two new points to staff responsibilities to identify students may not be ready to disclose and it is our staff's duty to build a trusted relationship to help facilitate communication (S 8.1) - Changed peer on peer abuse to child-on-child abuse as per KCSiE terminology change. - updated references to KCSiE 2022 in preparation for change in September 2022
01/09/2021	<p>Annual policy review as per commitment:</p> <ul style="list-style-type: none"> -Added new section to responding to peer-on-peer child-on-child abuse (S 16.5) -Updated reference and links to KCSiE September 2021.Update to reporting process Section 16 and Appendix B to include new, secure online form. <p>General improvements to policy clarity/structure</p>
01/09/2020	<p>Policy Reviewed as per annual commitment</p> <p>Updated references to KCSiE from 2019 to 2020</p> <p>Safeguarding definition updated to clarify prevention of impairment of health is both mental and physical, as per amendment to KCSiE 2020 (pg3)</p> <p>Updated all staff's responsibility to include awareness of extra-familial harms (pg 6)</p> <p>Added new paragraph to staff expectations to raise awareness of ACES and poor mental health is an indicator of abuse/harm experienced and to report mental health concerns using the safeguarding reporting process (pg 13)</p> <p>Added when to call the policy, NSPCC guidance to useful links (Appendix D)</p>

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Part one: Policy

1 INTRODUCTION

Tute puts the student at the core of everything we do and safeguarding them is our absolute priority. Safeguarding and promoting the welfare of children is everyone's responsibility.

Every child has the absolute right to a childhood free from abuse, neglect or exploitation. We want students to learn and achieve safely.

Everyone who comes into contact with children and their families and carers has a role to play in safeguarding. In order to fulfil this responsibility effectively, all professionals should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child. Everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

Tute Education is committed to safeguarding and promoting the welfare of children by:

- Providing of a safe online environment in which children and young people can learn.
- Fulfilling our statutory (legal) responsibilities to identify children who may be in need of extra help or who are suffering, or are likely to suffer, significant harm
- Reporting any concerns to the relevant contacts to ensure that a suitable response is taken

Tute follows the guidelines set out in Keeping Children Safe in Education, Working Together to Safeguard Children, The Prevent Duty, UK GDPR, and OEAS Standards and update our safeguarding

policy on an annual basis to incorporate updates and stay current. It's essential to understand that Tute isn't a traditional educational setting. So, when it comes to meeting the standards for students, where we can we do, but there are instances where we cannot fully meet with some requirements.

2 PURPOSE AND AIMS

The purpose of this policy is to:

- protect children and young people who receive Tute's services from harm.
- provide staff, as well as children and young people with the overarching principles that guide our approach to child protection

This policy applies to anyone working on behalf of Tute, including senior leaders and the board of directors, employed staff, contracted staff, and students.

This policy will contribute to the safeguarding of students who use our online education service at **Tute** by:

- Creating a safeguarding culture
- Clarifying standards of behaviour for staff and students
- Equipping staff with the ability to identify the signs and indicators of safeguarding issues
- Contributing to the establishment of a safe, resilient, and robust safeguarding ethos in the organisation, built on mutual respect and shared values
- Teaching children about safeguarding, including online, through teaching and learning opportunities, as part of broad and balanced curriculum
- Developing staff awareness of the risks and vulnerabilities their students face by addressing concerns at the earliest possible stage
- Working in partnership with students, parents, schools, LAs and non-mainstream who use our online education service
- Designing plans to meet safeguarding needs

3 TUTE'S BELIEFS AND COMMITMENTS

We believe that:

- Children and young people should never experience abuse, neglect or exploitation of any kind

- We have a responsibility to promote the welfare of all children and young people, to keep them safe and to practise in a way that protects them
- Safeguarding should be a priority in the creation of the online environment

We recognise that:

- The welfare of children is paramount in all the work we do and in all the decisions we take all children, regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation have an equal right to protection from all types of harm, abuse, neglect or exploitation
- Some children are additionally susceptible because of the impact of previous experiences, their level of dependency, communication needs or other issues
- Working in partnership with schools, children, young people, their parents, carers and other agencies is essential in promoting young people's welfare

We will seek to keep children and young people safe by:

- Valuing, listening to and respecting them
- Appointing a nominated child protection lead for children and young people, a deputy and a lead trustee/board member for safeguarding
- Adopting child protection and safeguarding best practice through our policies, procedures and code of conduct for staff and volunteers
- Developing and implementing an effective online safety policy and related procedures
- Providing effective management for staff and volunteers through supervision, support, training and quality assurance measures so that all staff and volunteers know about and follow our policies, procedures and behaviour codes confidently and competently
- Recruiting and selecting staff and volunteers safely, ensuring all necessary checks are made
- Recording, storing and using information professionally and securely, in line with data protection legislation and guidance [more information about this is available from the Information Commissioner's Office: ico.org.uk/fororganisations]
- Sharing information about safeguarding and good practice with children and their families via leaflets, posters, group work and one-to-one discussions
- Making sure that children, young people and their families know where to go for help if they have a concern
- Using our safeguarding and child protection procedures to share concerns and relevant information with agencies who need to know, and involving children, young people, parents, families and carers appropriately

- Using our procedures to manage any allegations against staff and volunteers appropriately
- Creating and maintaining an anti-bullying environment and ensuring that we have a policy and procedure to help us deal effectively with any bullying that does arise
- Ensuring that we have effective complaints and whistleblowing measures in place
- Ensuring that we provide a safe physical environment for our children, young people, staff and volunteers, by applying health and safety measures in accordance with the law and regulatory guidance
- Building a safeguarding culture where staff and volunteers, children, young people and their families, treat each other with respect and are comfortable about sharing concerns.

4 LEGISLATION

All action taken by Tute Education will be in accordance with current legislation set out in the Education Act 2002, section 175.

5 STATUTORY GUIDANCE

Keeping Children Safe in Education (2024)

Statutory guidance issued by the Department for Education which sets out the legal duties to safeguarding and promote welfare of children and young people under the age of 18 in schools and colleges.

Working Together to Safeguard Children (2023)

Sets out the multiagency working arrangements to safeguard and promote the welfare of children and young people and protect them from harm; in addition, it sets out the statutory roles and responsibilities of schools.

Sexual violence and sexual harassment between children in schools & colleges (2021)

Provides advice for schools for colleges on how to prevent and respond to reports of sexual violence and harassment between children.

Equality act (2010)

States that no unlawful discrimination against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity or sexual orientation.

Teacher Standards (2011)

States that teachers, including headteachers, should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.

All key documentation, procedures and guidelines are detailed in Appendix A

All staff at **Tute** have a role and responsibility to safeguard children and young people attending our online provision, irrespective of their role within the school by:

- Identifying concerns early and providing help for children and young people, to prevent concerns from escalating to a point where intervention would be needed via a statutory assessment under the Children Act 1989. These concerns should be discussed with the organisation's Designated Safeguarding Lead.
- All staff should be aware of the process and principles for sharing information within the organisation.
- All staff should be aware that safeguarding incidents and behaviour can be associated with factors outside the school and/or can occur between children (child-on-child abuse) outside of these environments. Extra-familial harms take a variety of different forms and children can be susceptible to multiple harms including (but not limited to) sexual and criminal exploitation and serious youth violence.
- The most important consideration is whether sharing information is likely to safeguard and protect a child.
- **Any staff member who has a concern about a child's welfare should follow the referral processes set out in Appendix B**

6 RELATED POLICIES

This policy should be read in conjunction with the following policies:

- Whistleblowing policy
- Safer recruitment policy
- Risk management policy
- Risk assessment policy
- Student health and safety policy
- Managing allegations policy
- Anti-bullying policy

- Communications policy
- Data protection policy
- Serious incident policy
- Online safety policy
- Code of conduct that sets out behaviours and roles
- Safeguarding training strategy

7 DEFINITIONS

7.1 Child

A child is a person under the age of 18.

7.2 Safeguarding

Safeguarding and promoting the welfare of children is defined in Working Together to Safeguard Children (2023) as:

- providing help and support to meet the needs of children as soon as problems emerge
- 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 are growing up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes

7.3 Child Protection

Child protection refers to the situation where a child is suffering significant harm, or is likely to do so, and action is required to protect that child.

7.4 Child abuse

Child abuse is the maltreatment of a child by another person – by adults or children. Somebody may abuse, neglect or exploit a child by inflicting harm, failing to act to prevent harm or take advantage of an imbalance of power to coerce, control, manipulate or deceive a child. Children may be abused in a family or in an institutional, educational or community setting by those known to them or, more rarely, by others unknown to them e.g. via the internet.

Child abuse, neglectful behaviour and exploitation can and does happen to children from any background, culture, class, ethnicity or faith and can be physical, sexual or emotional. It is important

that everyone involved in recognising the signs of child abuse understands the physical indicators and symptoms.

See Appendix B and C for more information about abuse, neglect and exploitation.

See here for further information: <https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/>

7.5 Special education needs, disabilities or health issues

Children with special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline. Tute recognises that additional barriers can exist when recognising abuse, neglect and exploitation in this group of children. These can include:

- Making assumptions that indicators of potential abuse, such as changes in behaviour, mood, or injuries, are solely attributed to the child's underlying condition without conducting further investigation.
- Children with special educational needs or disabilities (SEND) or specific medical conditions may face an elevated risk of experiencing peer group isolation, bullying, including prejudice-based bullying, more frequently than their peers.
- A heightened vulnerability of children with SEND or specific medical conditions to the effects of bullying, even when they may not outwardly show visible signs of distress or harm.
- Communication barriers and the challenges children with SEND may encounter in expressing or reporting safeguarding concerns.
- The impact of cognitive understanding, particularly when children may struggle to differentiate between factual and fictional online content.

Any reports of abuse involving children with SEND will be coordinated by the designated safeguarding lead, or deputy, and the SEND lead teacher when reporting to commissioners.

7.6 Extra-familial harm

Tute recognises that harm can occur outside the family home, and safeguarding risks extend beyond the immediate environment. Extra-familial harm includes risks such as:

- Child Criminal Exploitation (CCE), including County Lines – where children may be coerced into criminal activities.

- Child Sexual Exploitation (CSE) – where children are manipulated, exploited, or abused in exchange for something of perceived value.
- Radicalisation and extremism – where children are exposed to radical ideologies online or in the community.
- Serious youth violence and gang Involvement – where children are pressured into violent or criminal networks.
- Online grooming and cyberbullying – including coercion through social media, gaming, and online platforms.

Tute's safeguarding team provides guidance to all staff on recognising, assessing, and responding to extra-familial harm. This includes:

- Identifying signs of CCE, CSE, radicalisation, and online grooming.
- Understanding how these risks appear in online learning environments and student engagement patterns.
- Clear reporting processes for disclosures, including referrals to external safeguarding partners

7.7 Disclosure

Disclosure is the process by which a child will let someone know that abuse is taking place. This may not happen all in one go and may be a slow process that takes place over a long period of time.

7.8 Concern

A safeguarding **concern** is a feeling or worry that a child or adult may be at risk of harm, or may have been harmed.

See Appendix B and C for more information about how children may be at risk.

8 CODE OF CONDUCT

If a child is in immediate danger or is at risk of harm, a referral should be made to the DSL/DDSL immediately.

Anyone can make a referral. Where referrals are not made by the DSL, they should be informed, as soon as possible, that a referral has been made.

8.1 Staff will:

All staff will:

- Put the student at the core of their work
- Understand this safeguarding policy (please ask DSL if you require support)
- Adhere to this safeguarding policy as well as supporting policies listed in Section 6
- Be subject to Tute's safer recruitment process including checks
- Be involved, where appropriate, in the implementation of individual education programmes, integrated support plans, child in need plans and interagency child protection plans
- Be vigilant to signs and indicators of possible abuse, neglect or exploitation
- Report **all** concerns that they have, following the Tute reporting process laid out in Appendix B
- Record concerns and give the record to the DSL
- Promote a culture of safeguarding
- Assume that "it can happen here"
- Understand students may not feel ready to tell you that they are being abused but this must not prevent you from having a professional curiosity and reporting concerns you have regarding a student.
- Determine how to build a trusted relationship with students to facilitate communication.
- Ask DSL or DDSL for permission to contact students outside of Tute's platform. Agreement will be granted in exceptional circumstances, with a member of the Tute team copied into correspondence, and only when communication is not possible in the platform

8.1.1 Staff will not:

- Befriend/follow/accept requests/communicate with students on any social networking site
- Communicate with pupils outside of the context of our secure learning environment
- Meet students in person
- Request personal information or contact details from students.
- Ask that students use webcams, unless specific agreement is made with commissioning organisation.
- Give out any personal details
- Ask students for personal details
- Ask students for images

8.2 Students

All students should:

- Never share social media details in the chat box.
- Not use profane language.
- Never use threatening behaviour.
- Not ask teachers personal details.
- Not be over familiar.
- Never give out their login details to anyone.

8.3 Commissioners

All organisations commissioning Tute's provision should:

- Make sure students are aware of and agree to follow our communication (behaviour) policy and code of conduct.
- Add safeguarding@tute.com onto their whitelist as this is how they will receive safeguarding reports.
- Provide us with the outcome of any safeguarding report.
- Provide a safeguarding contact.
- Know that where a school places a pupil with an alternative provision provider, it continues to be responsible for the safeguarding of that pupil and should be satisfied that the placement meets the pupil's needs.

9 TRAINING

Please read Tute Training Strategy alongside the summary below

- In addition to this policy, all staff and contractors will read, understand and adhere to Part One and annex B: Keeping Children Safe in Education (KCSIE) (2024)
- All staff and contractors will read, understand and adhere to Working together to Safeguard Children (2033)
- Upon induction, and annually thereafter, all staff and contractors must complete:
 - Level 2 safeguarding training (Virtual College)
 - Online safety training (Virtual College)
 - Child sexual exploitation training (Virtual College)
 - Prevent duty awareness course and guidance (Gov)
 - Extra-familial harm guidance

- Induction and training will be in line with advice from the Department for Education and safeguarding partnerships
- All training will be contextualised to take into account the online nature of Tute and the different requirements for this environment
- All staff will complete Tute-specific assessments that will assess knowledge of policies, processes, and procedures
- All staff will receive frequent safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings) to provide them with relevant skills and knowledge to safeguard children effectively
- Whistleblowing procedures will be covered in annual Inset training, so that staff know what to do if they have concerns relating to safeguarding practice within the organisation
- All training will be effective and comply with the law at all times
- The DSL and DDSL will undergo training to provide them with the knowledge and skills required to carry out the role. The training will be updated every two years.
- Tute will ensure that at least one person on any appointment panel will have undertaken safer recruitment training, in line with School Staffing (England) Regulations 2009.
- The DSL will undertake Prevent awareness training and in turn will provide advice and support to staff on protecting children from the risk of radicalisation.
- Online safety training for staff will be integrated, aligned and considered as part of the overarching safeguarding approach
- Tute will Learn from Serious Case Reviews (SCRs), Domestic Homicide Reviews (DHRs) and other safeguarding reviews and disseminate and act on audits
- Tute will respond to and learn from national and local developments and guidance relating to safeguarding children/susceptible adults
- Tute subscribes to Safeguarding Network for support, advice, updates, and training

10 SAFER RECRUITMENT AND SELECTION

Please read Tute Safer Recruitment Policy

Tute follows a rigorous safer recruitment process, detailed in the submitted policy, that meets Part 3: Safer Recruitment, Keeping Children Safe in Education (2024). All members of staff have been recruited with this process. Four members of the Tute team (DSL, DDSL, Head of People Culture and Social Responsibility and Head of Teaching and Learning) are trained in safer recruitment and at least one sits on every interview panel.

By ensuring that all employees are thoroughly vetted during the recruitment process, Tute can provide the maximum protection possible to its students and remain in full compliance with government regulations.

Offers of employment are made upon the condition of satisfactory completion of the necessary pre-employment checks: proof of identity; two written references; health questionnaire; right to work in the UK; lived or worked outside of the UK; qualifications check (including QTS for tutors); and enhanced DBS check with Barred List Check.

All Tute staff are subject to an enhanced DBS check with Barred List Check. All are required to register with the DBS Update Service; made clear at application stage (all Tute staff are subscribed). At application, all candidates confirm whether they have a current DBS check and are registered to the Update Service. With their permission (as per GDPR regulations) we check this.

If current and active, Head of People, Culture and Social Responsibility uses gov.uk website to check the DBS number is correct and view potential disclosures. If any disclosures cause concern, we will not offer a role. DBS information is recorded in Tute's Single Central Record (SCR). The individual's record is updated in Tute's Breathe HR system

If not current and active, the candidate must undertake a new DBS check. They can arrange this themselves via a third party of their choice or apply to the third party used by Tute (UCheck). The candidate must then register for the update Service and Process above is followed. DBS check and Barred List check audits are completed and recorded each half term by the Head of People, Culture and Social Responsibility

Tute maintains an electronic SCR where information about all checks is stored. Tute's Head of People, Culture and Social Responsibility is responsible for maintaining the SCR, supported by Tute's /DDSL, and Head of T&L. The Managing Director/DSL is responsible for checking the accuracy of the SCR. Checks on the SCR are made by DSL/MD every month.

11 ROLE OF THE DESIGNATED SAFEGUARDING LEAD (DSL)

Details of Tute's Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Lead (DDSL) can be found on the cover page of this policy and are copied below:

NAME	ROLE	JOB TITLE	DATE TRAINING	CONTACT
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The DSL is a senior member of staff, who undertakes lead responsibility for safeguarding and child protection within the organisation. Whilst the activities of the DSL can be delegated to appropriately trained deputies, the ultimate lead responsibility for safeguarding child protection remains with the DSL.

The broad areas of responsibility for the DSL are:

- **Managing referrals** – Contacting other agencies within 24 hours of the report being received. Contacts include, the local authority children's social care in cases of suspected abuse; the Channel Programme where there is a radicalisation concern; the Disclosure and Barring Service in cases where a person is dismissed or left due to risk/harm to a child and the Police in cases where a crime may have been committed in relation to safeguarding. The DSL will also support and advise other staff in making referrals to other agencies and bring parents into the process where appropriate and possible.

- **Undertake Training** to ensure the DSL (and any deputies) will undergo training to provide them with the knowledge and skills required to carry out the role.
- **Manage safeguarding information** through the collection, monitoring, reporting, reviewing, safe storage and transfer of safeguarding and child protection files in line with company policy.
- **Availability** of the DSL (or a deputy) during term time and school hours needs to be ensured for staff to discuss any safeguarding concerns.

A more detailed description of the role of the DSL is explained in more detail in Keeping Children Safe in Education (2024) – Appendix A

12 CREATING A CULTURE OF SAFEGUARDING

12.1 Whole organisation approach

- Safeguarding is everyone's responsibility.
- All policies which address issues of power and potential harm, for example anti-bullying, and equal opportunities, will be linked to ensure a whole organisation approach
- The safeguarding policy cannot be separated from the general ethos of the organisation, which should ensure that students are treated with respect and dignity, taught to treat each other with respect, feel safe, have a voice, and are listened to.
- Staff members working with children are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the best interests of the child.
- Tute shall take every opportunity to promote safeguarding, creating a culture where safeguarding is at the forefront of our service delivery. Despite children not being directly in our care we will not assume another organisation is taking on responsibility for safeguarding and do everything in our power to safeguard pupils or students.

12.2 What staff need to know

All staff need to be aware of the systems within Tute Education which support safeguarding and child protection – this forms part of the induction process but also on-going training which is regularly updated.

All staff should:

- Know who is appointed as Tute's DSL and deputies and how to contact them;
- Read, understand and adhere to this policy and revisit it annually/or when significantly amended
- Read Part 1 and annex B: Keeping Children Safe in Education (2024)
- Attend safeguarding training
- Understand how to monitor and filter student chats and posts within the Tute platform and awareness of the flagging process.
- Be aware of the organisation's procedures in order to identify those students in need of early intervention/help and take appropriate action where there are concerns for the welfare and protection of children and young people
- Know what to do if a child tells them he/she is being abused, neglected or exploited. Staff should know how to manage the requirement to maintain an appropriate level of confidentiality whilst at the same time liaising the designated safeguarding lead. Staff should never promise a child that they will not tell anyone about an allegation - as this may ultimately not be in the best interests of the child (See Appendix C);
- Report concerns about a child/young person immediately or as soon as it is practicable to the DSL; however, if a child is in immediate danger the DSL would follow our reporting procedures immediately
- Be aware of signs of abuse, neglect or exploitation see Appendix E
- Be aware of whistleblowing procedures to the senior leadership team if they have concerns about safeguarding practices within the organisation. Where a staff member feels unable to raise an issue with the senior leadership team or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them. General guidance can be found at- Advice on whistleblowing
- Public Concern at Work - PCAW (Charity that supports Whistleblowers)
- The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nspcc.org.uk.
- Tute enforces a 'No Victimisation' policy: No employee will face repercussions for reporting safeguarding concerns in good faith
- Be aware that if staff are employed in provision covered by the Childcare Regulations 2009 and fall within the scope of Disqualification under the Childcare Act 2006, they must complete a self-declaration form in addition to the enhanced DBS
- Be aware that mental health problems, can in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. If you have a mental health

concern about a child, staff should report this using safeguarding process and procedures details in Annex B.

12.3 Staff support

It is recognised the stressful and traumatic nature of safeguarding and child protection work. Tute Education will support staff by providing an opportunity to talk through their anxieties with the DSL and to seek further support as appropriate.

12.4 Central risk register – identification and monitoring of at-risk students

Tute recognises that certain students require increased vigilance due to safeguarding risks, individual learning needs, or personal circumstances that may impact their engagement, well-being, and safety. To ensure effective identification and ongoing monitoring, Tute maintains a Central Risk Register.

The Central Risk Register serves as a structured record of critical student information that is essential for safeguarding and personalised learning approaches.

Purpose of the central risk register

The register has been implemented to:

- Ensure that students at higher risk are identified, monitored, and appropriately supported.
- Provide staff with access to key information that enables responsive safeguarding and learning adaptations.
- Maintain a consistent and centralised record of safeguarding risks, non-standard requests, and other critical factors that impact student engagement.
- Ensure compliance with safeguarding obligations and best practices as outlined in Keeping Children Safe in Education (2024) and OEAS Standards.

Structure of the central risk register

The register consists of three key categories of student-related information:

1. Safeguarding risk

- For students facing immediate and significant safeguarding risks, such as serious exploitation, severe self-harm, or posing a serious risk to others.
- Example: A recent safeguarding concern raised by a school or a significant incident that increases vulnerability.

2. Non-standard requests

- Documents specific requests related to individual student needs that require adaptations in teaching or support.
- Example: Requests to avoid direct questioning to the student.

3. Non-standard information

- Captures relevant details that may impact a student's engagement, behaviour, or well-being but do not fall under safeguarding risk or non-standard requests.
- Example: Recent bereavement, family circumstances

Management and access

- The register is maintained and updated by the safeguarding team and relevant designated staff.
- Three category-specific sheets provide detailed information on safeguarding risks, non-standard requests, and non-standard information.
- Information is reviewed regularly to ensure accuracy and relevance.
- Restricted access is in place to ensure that only authorised staff can view or update the register, maintaining confidentiality and compliance with GDPR.
- Students listed on the register will have a flag next to their name on the platform for, indicating a specific requirement that staff need to be aware of when delivering lessons.

Staff responsibilities

- Check the register daily to stay informed of any students who require additional attention.
- New student additions will be communicated, ensuring staff are aware of updates.
- Continue to use the teaching platform dashboard for standard student profiles.

Part 2 The Tute platform

Ensuring that students are safe whilst using our platform and Learning Cloud is paramount.

13 POLICY STATEMENT

We recognise that:

- Learning online provides students with unique opportunities that would otherwise not be available to them
- We have a duty to ensure that, whilst learning online with Tute, students are protected from harm
- The relative anonymity that The Learning Cloud provides may make students more likely to make a disclosure
- It is more challenging to identify safeguarding concerns in The Learning Cloud than in a face-to-face environment
- Staff have to be vigilant and well-trained to identify concerns

We seek to fulfil this duty by:

- Having a DSL and a deputy DSL in place to oversee online safety in the wider context of our safeguarding policies and procedures
- Providing clear instruction to our teachers about how to behave online through our code of conduct
- Supporting our students to use our Learning Cloud in a manner that keeps themselves and others safe
- Maintaining clear and robust procedures to respond swiftly and appropriately to any instances of inappropriate behaviour
- Reviewing and updating the security of our information systems regularly
- Ensuring that sensitive data is encrypted and adequately protected in transit
- Ensuring that personal information held about the adults and children who are involved with our organisation is held securely and shared only as appropriate
- Ensuring images and written information about students are used only after written permission has been obtained and only for the purpose for which consent has been given
- Providing supervision, support, and training for staff in online safety
- Examining and risk assessing any new technologies before they are used in our organisation

If online abuse occurs, we will respond to it by:

- Having clear and robust procedures in place for responding to abuse (including online abuse)

- Providing support and training for all staff on recognising and dealing with all forms of abuse, including bullying/cyberbullying, emotional abuse, sexting, sexual abuse and sexual exploitation
- Making sure our response considers the needs of the person experiencing the abuse, any bystanders and our organisation as a whole
- Reviewing our procedures to address online abuse at regular intervals to ensure any problems are resolved in the long-term

13.1 Online safety in lessons

- Every live lesson is recorded. This enables us to effectively evidence and safeguarding concerns and encourages student to be more aware of their behaviour in lessons.
- Webcams are locked. Students can see their teacher but cannot be seen by the teacher or by other students in the lesson. This creates a comfortable degree of anonymity for students.
- Lock features for the chatbox and microphone prevent the misuse of these features.
- Chat can be immediately deleted. If a student shares inappropriate information, for example snapchat details, this can be immediately removed to limit exposure to bystanders in the lesson.
- When our safeguarding team identify a playback with a safeguarding concern has been raised, our team has the ability to restrict view of this playback to ensure confidentiality.

13.2 Online safety in Tute Bases

Tute Bases are secure areas in the Tute Platform that allow pupils or students to continue learning outside of lessons, through communication with each other and their teacher.

- Our profanity filter prevents the use of inappropriate language
- Post reporting method so inappropriate posts can be flagged to teacher who owns the Base and admin.
- When a post is flagged this message will be hidden from view and reviewed by our team.
- Where a post warrants a safeguarding concern our safeguarding team will ensure a report is referred to the relevant contacts.
- Everything is saved in database and backed-up, deleted content can be recovered
- Backed up daily

13.3 Recording and playback

All Tute lessons are recorded automatically.

Recordings are stored securely within our platform. For more information on how the recordings are stored, please visit our data protection policy.

Access to playback is straightforward in Tute's platform. A list of playbacks can be found in the playback section and can be filtered to find the required lesson.

Playback supports safeguarding in that it allows us to watch/listen again to disclosures and provide this as evidence.

All activity is recorded, including the chat transcript.

13.4 Sharing student data with schools

In the interests of maintaining clear channels of communication with schools and collaborating to ensure the best outcomes for students, we recognise the importance of making progress tracking information available.

- Progress, engagement and attendance data is made available to commissioners in the Tute platform
- Progress reports are made available to commissioners via a secure One Drive folder which is unique to their establishment
- Any data shared by email is sent using Egress encrypted mail delivery

13.5 Filtering and monitoring

KCSIE demands that schools have appropriate filtering and monitoring systems in place across school devices and networks, along with designated personnel responsible for effectively restricting access to harmful online content. It's important to note that Tute is unable to filter or monitor activities on either student personal or school devices. Instead, this responsibility rests with the respective commissioners who should have the necessary systems in place.

Tute works closely with commissioners to:

- Ensure that pupils are learning in an environment with appropriate online safeguards.
- Share concerns and recommendations regarding online risks identified during or outside of lessons.
- Support commissioners by promoting safe online behaviours among students

Tute staff will be vigilant to any indications of attempts to access potentially concerning websites and promptly report such instances following our safeguarding process. Tute adheres to the government guidance on [safeguarding and remote education](#).

13.6 Web cam use

At Tute, we have thoughtfully designed our approach to student webcam usage to prioritise safeguarding, inclusivity, and effective engagement.

While teachers are required to share their webcams to foster connection and facilitate teaching, students' webcams are by default turned off in group settings. Below are the key reasons underpinning this:

1. Safeguarding concerns

- **Protection of privacy:** Many students access our online learning platform from home, often in private spaces such as their bedrooms. Turning on webcams could expose personal and private environments, which we aim to safeguard.
- **Preventing misuse:** In today's digital world, there is a risk of students misusing or manipulating images of others. By not enabling student webcams, we reduce the opportunity for misuse, including online bullying or sharing of images without consent.
- **Anonymity for safety:** Ensuring students do not recognise one another is a key part of maintaining their safety, particularly in cases where students come from vulnerable or sensitive circumstances. Webcams could compromise this anonymity.

2. Supporting students' comfort and engagement

- **Reducing anxiety:** Many of our students face barriers to learning in traditional settings, including anxiety. Allowing them to remain off-camera helps create a safe and comfortable environment where they can focus on learning without feeling self-conscious.
- **Promoting participation:** Research and our experience show that students are more likely to engage in lessons when they are not worried about being on display. The lack of visual exposure encourages open interaction and reduces distractions.

3. Minimising distraction

- **Avoiding visual overload:** Having multiple webcams on during group lessons can be visually overwhelming and distracting for both students and teachers. The focus should remain on the lesson content, and the absence of student webcams ensures this.

4. Cultural sensitivity and diverse circumstances

- **Acknowledging diverse home environments:** Students' home environments vary widely, and some may not feel comfortable showing their surroundings due to cultural, personal, or socio-economic reasons. Turning off webcams ensures every student can participate equally without concern about exposing aspects of their personal lives.
- **Respecting cultural norms:** Some cultural or familial norms may discourage showing faces or sharing personal spaces with strangers. By defaulting to no webcams, Tute honours these differences and avoids potential discomfort.

Webcam use in one-to-one sessions

In one-to-one lessons, webcams may be used at the request of the partner. This is particularly valuable for welfare checks, verifying student identity, or briefly assessing their condition. These instances are carefully managed and typically last only as long as necessary, such as a few seconds or a pre-agreed duration.

Flexibility

While Tute's policy generally restricts the use of student webcams in group settings for the reasons outlined above, we remain flexible to meet specific needs in one-to-one scenarios. Any deviation from this default policy will be clearly agreed upon with the partner and carefully managed to ensure the continued protection and comfort of the student.

By prioritising safety, inclusivity, and focus in our online classrooms, this policy enables us to maintain a secure and supportive learning environment for all our students.

13.7 Prevent Duty and protection from radicalisation

Tute is committed to supporting our partners in fulfilling their legal obligations under The Prevent Duty (Counter-Terrorism and Security Act 2015) to safeguard students from radicalisation and extremism. While Tute is an online education provider, we recognise that students may be vulnerable to radicalisation through online influences, peer interactions, and external environments.

Key responsibilities under Prevent:

- **Risk assessment of radicalisation concerns:** Tute identifies students at risk through lesson interactions, engagement tracking, safeguarding reporting, and partner communication.
- **Staff training:** All staff complete Prevent Duty awareness training, which includes recognising early indicators of radicalisation and responding appropriately

- **Raising concerns:** Any safeguarding concern related to extremism, radicalisation, or extremist narratives will be reported immediately to:
 - DSL, DDSL and safeguarding team
 - The student's commissioning partner
 - Local authority Prevent coordinators or Channel programme referrals (if required).
- **Collaboration with external agencies**—Tute works with local authorities, police Prevent officers, and safeguarding leads when necessary to manage risks.

Reporting Prevent concerns

- If an immediate risk of harm or violence is identified: Contact 999.
- For safeguarding concerns related to extremism: Follow Tute's internal safeguarding referral process, escalating to the DSL and relevant authorities.
- Referrals to Channel Panel: Where necessary, Tute will support commissioning partners in referring a student for multi-agency Prevent support.

13.8 Online safety for students

At Tute, we are committed to equipping students with the knowledge, skills, and behaviours they need to navigate the online world safely. We recognise the unique risks posed by online learning environments and actively teach students how to identify and respond to online threats.

How Tute educates students on online safety:

1. Embedding online safety in the curriculum:

- Online safety is integrated into lessons and enrichment activities to ensure all students understand:
 - Risks associated with online interactions (e.g., cyberbullying, grooming, phishing scams).
 - Safe and responsible use of online platforms, including Tute's Learning Cloud.
 - Privacy and the importance of safeguarding personal information online.
 - Digital footprints and the lasting impact of online behaviours.

2. Dedicated online safety programme:

- Tute delivers an online safety programme. These lessons address:

- Identifying inappropriate content and reporting mechanisms.
- Recognising and managing cyberbullying.
- Responding to online grooming or exploitation.
- Avoiding scams, malware, and phishing emails.

3. Promoting a safe online environment:

- Online safety messages can be reinforced at the start of or throughout Tute lessons through the Learning Cloud default slide. This slide highlights key rules for:
 - Respectful and safe communication.
 - Reporting inappropriate or unsafe behaviour.

4. Student feedback and engagement:

- Students are invited to provide feedback on feeling safe in Tute lessons through student voice surveys.
- Feedback is reviewed to improve the support and guidance provided on online safety.

Monitoring and Evaluation:

- Tute will track the impact of online safety education through:
 - Student participation in lessons.
 - Feedback from students and staff.
 - Safeguarding incident trends related to online safety.
- Findings will be used to adapt and enhance the online safety education programme.

13.9 Risk management and assessment

Tute Education is committed to proactive risk management to ensure a safe and structured online learning environment. Risk management is an ongoing process that involves identifying, assessing, mitigating, and monitoring potential risks that could impact student safety, safeguarding, and overall well-being.

Key risk management measures include:

- **Organisation-wide risk assessment:** Identifying safeguarding, online safety, engagement, and cybersecurity risks.

- **Ongoing risk identification:** Risks are continuously monitored through lesson observations, engagement tracking, safeguarding reviews, and governance oversight.
- **Collaboration with stakeholders:** Tute works closely with commissioning partners, schools, and local authorities to assess risks affecting students.
- **Structured escalation and review:** Risks are escalated and addressed through reporting mechanisms, including weekly risk meetings, leadership reviews, and board-level oversight.

Commissioning partners are responsible for conducting pre-enrolment risk assessments to identify any safeguarding, well-being, or technical risks that may impact a student's ability to engage with online learning. Tute provides risk assessment guidance and a structured template for commissioning partners who do not have an existing process.

For full details, refer to:

- Risk management policy
- Risk assessment policy

13.10 Student health and safety

Tute is committed to ensuring that students access online learning in a safe, structured, and supportive environment. Our approach to student health and safety includes:

- **Safe online learning environment:** Secure platform access, moderation of chat and content, profanity filtering, and safeguarding monitoring.
- **Supervision and engagement:** Encouraging commissioners to ensure appropriate supervision where necessary, with lessons recorded for safeguarding purposes.
- **Technical security and cybersecurity protections:** Compliance with Cyber Essentials and data protection regulations to maintain a secure digital learning space.
- **Student well-being and mental health:** Encouraging screen breaks, ergonomic workspaces, and engagement monitoring to ensure students remain safe and well-supported.
- **Incident reporting and response:** Structured reporting system with clear escalation procedures for safeguarding concerns and technical issues affecting student safety.

For further details, refer to student health and safety policy.

14 SECURITY OF TUTE'S ONLINE CLASSROOM AND PLATFORM

Our platform is hosted in the UK in a secure cloud environment

All data is encrypted at rest and in-transit using SSL/TLS. Our SSL connections are established using 2048-bit keys

Passwords are securely stored in our database using hashing algorithms

The content sent to and from the online classroom is encrypted using TLS/SSL

The audio, video and screen sharing within the online classroom uses WebRTC which transmits real-time protocol packets (RTP) over user datagram protocol (UDP) via Datagram Transport Layer Security (DTLS), and media packets are encrypted using Secure Real-Time Protocol (SRTP)

Tute Education adheres to the standards set by meeting digital and technology standards in schools and colleges, where applicable. All staff who deliver lessons from Tute office access full fibre connection; this cannot be guaranteed when working from home, however rigorous IT tests are completed for all teachers to ensure minimum requirements are met ensuring lesson delivery is not interrupted.

Tute holds Cyber Essentials certification.

Part 3: Procedures

15 RECOGNISING AND RESPONDING TO CONCERNS

It can be very hard for children and young people to speak out about abuse, neglect or exploitation. Often, they fear there may be negative consequences if they tell anyone what's happening to them.

Some may delay telling someone about abuse, neglect or exploitation for a long time, while others never tell anyone, even if they want to.

It's vital that children and young people are able to speak out and that whoever they tell takes them seriously and acts on what they've been told.

Sometimes, children are more open in the more anonymous online environment; they may feel more comfortable in making a disclosure. Staff should be ready for this.

Even if a child doesn't tell someone verbally about what's happened to them, there may be other indicators that something is wrong. People who work with children need to be able to recognise the signs and know how to respond appropriately.

This section outlines best practice for recognising and responding to abuse and some of the issues which may arise when working with children who have been abused.

15.1 Identifying concerns

Recognising signs of abuse, neglect or exploitation (see Appendices C and D) in the online environment can be more difficult than in face-to-face settings. Staff must be vigilant to spot other signs that may suggest abuse such as changes in behaviour, lower attendance, and interactions with other students.

15.2 How disclosure happens

Children and young people may disclose abuse, neglect or exploitation in a variety of ways, including:

- **Directly**
 - making specific verbal statements about what's happened to them
- **Indirectly**
 - making ambiguous verbal statements which suggest something is wrong
- **Behaviourally**
 - displaying behaviour that signals something is wrong (this may or may not be deliberate)
- **Non-verbally**
 - writing letters, drawing pictures or trying to communicate in other ways. This can be in the form of an assignment posted in Tute Bases

Children and young people may not always be aware that they are disclosing abuse, neglect or exploitation through their actions and behaviour.

Sometimes children and young people make partial disclosures of abuse, neglect or exploitation. This means they give some details about what they've experienced, but not the whole picture. They may withhold some information because they:

- are afraid they will get in trouble with or upset their family
- want to deflect blame in case of family difficulties as a result of the disclosure
- feel ashamed and/or guilty
- need to protect themselves from having to relive traumatic events.

When children do speak out it is often many years after the abuse has taken place (McElvaney, 2015).

15.3 Barriers to disclosure

Some children and young people are reluctant to seek help because they feel they don't have anyone to turn to for support.

They may have sought help in the past and had a negative experience, which makes them unlikely to do so again.

They may also:

- feel that they will not be taken seriously
- feel too embarrassed to talk to an adult about a private or personal problem
- worry about confidentiality
- lack trust in the people around them (including parents) and in the services provided to help them
- fear the consequences of asking for help
- worry they will be causing trouble and making the situation worse
- find formal procedures overwhelming

(Mental Health Foundation and Camelot Foundation, 2006).

Not all children and young people realise they have experienced abuse, neglect or exploitation for example if they have been groomed.

Some young people may not feel confident with disclosing or sharing information, particularly with a member of staff they may have only met online. We make it clear that young people may also report concerns through external routes, such as the National Crime Agency's CEOP resource Thinkuknow. This is made clear on the student hub.

15.4 Responding to disclosure

Disclosure is the process by which children and young people start to share their experiences of abuse, neglect or exploitation with others. This can take place over a long period of time – it is a journey, not one act or action.

Children may disclose directly or indirectly and sometimes they may start sharing details of abuse before they are ready to put their thoughts and feelings in order.

Not all disclosures will lead to a formal report of abuse, or a case being made or a case being taken to court, but all disclosures should be taken seriously.

It takes extraordinary courage for a child to go through the journey of disclosing abuse.

It's vital that anyone who works with children and young people undertaking this journey is able to provide them with the support they need.

(Baker et al, 2019) found three key interpersonal skills that help a child feel they are being listened to and taken seriously:

- **Show you care, help them open up:** Give your full attention to the child or young person and keep your body language open and encouraging. Be compassionate, be understanding and reassure them their feelings are. Phrases such as 'you've shown such courage today' help.
- **Take your time, slow down:** Respect pauses and don't interrupt the child – let them go at their own pace. Recognise and respond to their body language. And remember that it may take several conversations for them to share what's happened to them.
- **Show you understand, reflect back:** Make it clear you're interested in what the child is telling you. Reflect back what they've said to check your understanding – and use their language to show it's their experience.

In addition:

- Make a detailed note about what was said – do not paraphrase or use language like "the child used inappropriate language". You must be specific
- Do not promise confidentiality – you must pass the information on
- Gather evidence if there exists any more e.g. chat transcript, assignment

15.5 Prejudice behaviour

The term prejudice-based bullying refers to a range of hurtful behaviour, physical, emotional or both, which causes someone to feel powerless, worthless, excluded or marginalised, and which is connected with prejudices around belonging, identity and equality in wider society – in particular, prejudices to do with disabilities and special educational needs, ethnic, cultural and religious backgrounds, gender, home life, (for example in relation to issues of care, parental occupation, poverty and social class) and sexual identity (homosexual, bisexual, transsexual, pan sexual and transgender).

Bullying and discriminatory bullying are unacceptable and should never be tolerated. Teachers are trained in Tute's behaviour for learning policy, a comprehensive framework that guides the management of various behavioural issues and use this process to manage behaviour of all types, including discriminatory bullying. The behaviour for learning process commences with teachers

establishing clear expectations regarding behaviour and safeguarding; this is supported by use of the Learning Cloud default slide (appendix F).

Every instance of discriminatory bullying is promptly reported in accordance with Section 16 of Tute's safeguarding policy. We maintain a stringent approach to this issue, ensuring that all evidence of prejudice-based bullying, including lesson recordings and chat box transcripts, is diligently shared with the commissioning body for their awareness, collaboration and appropriate action.

16 REPORTING CONCERNS

Safeguarding concerns about a child must be reported immediately via **Tute's secure, online form.**

If you would like to talk about the concern, please contact the DSL or DDSL who will prioritise your query.

16.1 Process for reporting – Appendix B

The procedure to respond to a concern about a child is detailed in Appendix B. This process **must** be followed.

Setting safeguarding expectations

At the start of every lesson, the **Learning Cloud default slide** reinforces safeguarding expectations. This ensures that:

- Students understand that our role is to keep them safe at all times.
- They are aware of how to contact the safeguarding team if they need support.

Step-by-step reporting process

1. Recognising a concern

- A student may make a disclosure, or a teacher may observe something that raises a safeguarding concern.

2. Responding to the concern

- Stay calm, listen carefully, and reassure the student that they did the right thing by speaking up.
- Do not ask leading questions or promise confidentiality - explain that the information will be shared with the appropriate safeguarding team.

- Gather supporting evidence, such as a chat box transcript or a link to the recorded lesson, where relevant.
- If needed, the teacher can consult with the safeguarding team before submitting the report.

3. Reporting the concern

- The teacher must complete a safeguarding incident report as soon as possible.
- This report is automatically sent to the safeguarding team for review.

4. Safeguarding team review and next steps

After reviewing the report, the safeguarding team may take one or more of the following actions:

- **Request further information** or clarification from the reporting staff member.
- **Ask the teacher to monitor** the situation and provide feedback within a set timeframe.
- **Send the report** to the child's safeguarding contact via encrypted email.
- **Decide not to send the report** if it is deemed not a concern by the safeguarding team.
- **Refer directly** to social services, the police, **or the Local Authority Designated Officer (LADO)** if necessary.

5. Tracking, follow-up, and review

- All safeguarding reports, whether sent to a child's safeguarding contact or not, are recorded in Tute's secure online safeguarding tracking system.
- The safeguarding team follows up on cases where necessary and responds to feedback from partners.
- Reports are reviewed weekly to identify patterns and trends, which may inform further action, collaboration with partners, or additional safeguarding training for staff.

16.2 Mandatory reporting - FGM

It is illegal to carry out FGM in the UK. It is also a criminal offence for UK nationals or permanent UK residents to perform FGM overseas or take their child abroad to have FGM carried out.

In England and Wales, regulated health and social care professionals and teachers must make a report to the police, if, in the course of their duties:

- they are informed by a child under the age of 18 that they have undergone an act of FGM
- they observe physical signs that an act of FGM may have been carried out on a child under the age of 18

In Wales, professionals who identify cases of FGM need to make a report to both the police and the local authority.

Do inform the DSL/DDSL of your actions.

If your concern does not fall into one of the above two bullet points, follow the procedure in Appendix B.

16.3 Children absent from education

Students are not on roll at Tute; they access our service following a decision by the school, local authority, or non-mainstream setting to commission our service. Tute puts in place many steps to encourage, capture, report, and raise issues with attendance but is not able, due to the nature of commissioning, be responsible for ensuring that students attend lessons. However, we take many steps to encourage attendance and engagement to avoid non-attendance and to report this to commissioners provisioning them with some of the tools that they need to ensure that children and young people are accessing high-quality education.

Tute recognises that being absent from education for prolonged periods and/or occasions can act as a vital warning sign to a range of safeguarding issues, including neglect, child sexual exploitation and child criminal exploitation – particularly county lines.

16.4 Absence reporting

Tute understands the importance of capturing, tracking and communicating the session attendance of all students. We know that good attendance leads to improved outcomes, and we also understand that lack of attendance, unexplainable and/or persistent absences from education, particularly for disadvantaged children, can be a safeguarding concern.

What we do to support and manage attendance:

- Tute's platform captures attendance as on time, late or absent. If a student has not attended a lesson within 5 minutes of its start time, a nominated contact will receive an email informing them of absence allowing them the opportunity to contact the pupil/s and encourage attendance. A

follow up email is automatically sent if a late student then joins the lesson to inform the nominated contact(s).

- Tute's platform also captures tutors' attendance and, if they have not logged in to their lesson 5 minutes before its start time, Tute's admin team will receive a notification and will contact the tutor to ensure that they log in to the lesson as well as instruct a free teacher or staff member to access the lesson to ensure supervision. Tutors who do not attend sessions without good reason will be challenged and might be removed from the programme.
- Schools will have access to their students' attendance data via a comprehensive dashboard within the Tute platform to enable them to monitor, report and address issues.
- Tute also provides an attendance report in case schools do not access the dashboard. The above methods are successful in communicating the attendance information
- Teachers and schools can discuss engagement strategies and, if needed, Tute can pause programmes until students can attend
- Tute will always work with all involved to ensure that students get the best out of sessions
- We will be very flexible in accommodating needs and will ensure that communication is maintained

16.5 Making an allegation

If you have concerns about a colleague's behaviour and believe they may pose a safeguarding risk, you **must** report it. Safeguarding is everyone's responsibility, and we operate under the principle that "it can happen here."

Managing allegations against people in positions of trust

Allegations or concerns regarding individuals in positions of trust - such as staff, contractors, or volunteers - apply if they have:

- Harmed a child or placed them at risk of harm.
- Committed, or are at risk of committing, a criminal offence against or involving a child.
- Behaved in a way that indicates they are unsuitable to work with children, including behaviour outside of work.

Reporting allegations

All allegations against staff, contractors, or volunteers must be reported immediately to the Designated Safeguarding Lead (DSL) or Deputy DSL.

The DSL will:

- Assess the information and contact the Local Authority Designated Officer (LADO) within 24 hours.
- Inform the commissioning body.
- Where a criminal offence is suspected, make a referral to the police.

Responding to low-level concerns about staff

Not all concerns will meet the threshold for referral to the LADO. However, low-level concerns about staff behaviour must still be addressed to maintain a safe culture.

A **low-level concern** is any behaviour that does not meet the harm threshold but:

- Is inconsistent with professional expectations.
- Could be misinterpreted by others.
- Has the potential to undermine trust in the individual or organisation.

Examples include:

- A staff member breaching professional boundaries (e.g., overly familiar language or inappropriate humour).
- Minor breaches of conduct policies that do not pose an immediate safeguarding risk.

Process for low-level concerns:

- Report concerns to the DSL or Deputy DSL at the earliest opportunity.
- The DSL will assess the concern and determine if further action, such as additional training, informal management discussions, or record-keeping, is required.
- If concerns escalate or repeat, the case may be re-evaluated under formal safeguarding procedures.
- Low-level concerns will be recorded confidentially to identify any patterns of behaviour over time.

Scope of allegations

- Allegations may relate to incidents both inside and outside of work.

- Behaviour in a person's private life that raises concerns about their suitability to work with children must also be reported.

Response process

The LADO will oversee and advise on the investigation, which may include:

- An internal investigation (e.g., disciplinary action).
- A multi-agency response involving the police or children's social care.
- Referral to professional bodies (e.g., Teaching Regulation Agency).
- Referral to the Disclosure and Barring Service (DBS) if the threshold for barring is met.

Support and confidentiality

- Tute will ensure that all parties receive appropriate support throughout the process.
- Allegations will be handled with sensitivity, confidentiality, and fairness, in line with statutory guidance.

Outcome

- Investigation outcomes will be documented and shared with relevant authorities.
- If an individual is deemed unsuitable to work with children, a report will be made to the DBS and relevant professional bodies.

To make an allegation, please see managing allegations policy.

16.6 Parent commissioned lessons

While the vast majority of Tute's lessons are commissioned by schools, local authorities, or non-mainstream settings, there are rare instances, less than 0.5% of all lessons, where parents or guardians commission lessons for their child. In such cases, the parent/guardian would assume the role of the safeguarding contact for their child.

If a safeguarding concern or disclosure involving a parent/guardian arises during a lesson for such a student, Tute will report the concern to the Local Authority Designated Officer (LADO), to ensure the appropriate handling of such concerns.

7 SHARING OF INFORMATION

The UK General Data Protection Regulation (UK GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing but provide a framework to ensure that personal information about living individuals is shared appropriately. Under the UK GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do, such as where safety may be at risk. Fears about sharing information **cannot** be allowed to stand in the way of the need to promote the welfare and protect the safety of children, if unsure staff should contact the DSL to discuss. Tute's DSL will share safeguarding concerns to schools / organisations with the schools / organisations appropriate DSL or link contact if not specified. The information will be completed on a Tute Incident Report and sent using secure encryption email. Tute follows the ICO guidance 'For Organisations' which includes information about obligations and how to comply, including protecting personal information, and providing access to official information.

18 MULTI AGENCY WORKING

Staff work in partnership with other agencies in the best interests of the children. If there are child protection concerns, referrals should be made by the DSL (or Deputy DSL) to the schools and or LAs DSL who will investigate Tute Education's concerns raised via the incident report and escalate further by taking the appropriate actions i.e. reporting to their local Safeguarding Partnerships.

18.1 Disagreement on referrals

In cases where Tute believes a referral should be made to the Multi-Agency Safeguarding Hub (MASH) and the school or LA DSL decides not to refer the case, Tute reserves the right to override this decision. In such cases:

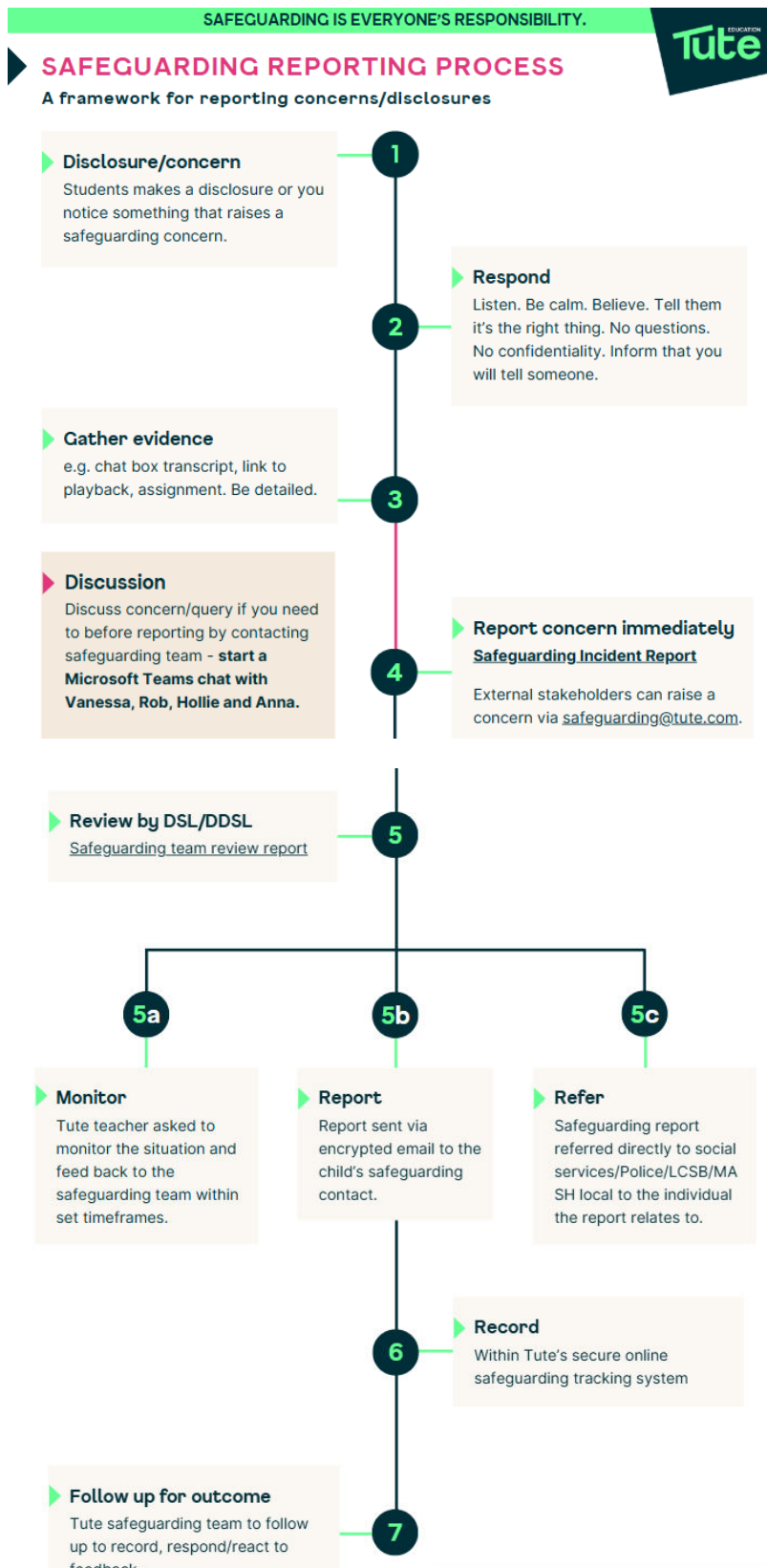
1. The DSL (or Deputy DSL) at Tute will document the concern, the school or LA's reasoning, and why Tute believes a referral is necessary.
2. The DSL (or Deputy DSL) will inform the school or LA DSL of Tute's intention to refer the case directly to MASH.
3. Tute will proceed with making the referral to MASH, ensuring all relevant information is provided to support the case.
4. Tute will maintain open communication with the school or LA, informing them of any updates from MASH or further actions taken.

19 Appendix A - Key Documentation, procedures and guidance

- Education Act 2002
- Keeping Children Safe in Education (2024)
- Working Together to Safeguard Children (2023)
- Data Protection Act (2018)
- What to do if you're worried a child is being abused (2015)
- Prevent Duty Guidance for England and Wales (2021)
- Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers (2018)
- Teachers Standards 2011
- Mandatory Reporting of Female Genital Mutilation – procedural information (2015)
- Sexual violence and sexual harassment between children in schools & colleges (2021)
- [Safeguarding children with special educational needs and disabilities \(SEND\)](#)
- [Safeguarding d/Deaf and disabled children and young people](#)
- Children Act (1989)

20 Appendix B – Tute process for reporting

[Bookmark this document for quick access.](#)



21 Appendix C – Types of abuse

Abuse, neglect exploitation is defined as the maltreatment of a child or young person whereby someone may abuse or neglect a child by inflicting harm, failing to prevent harm or taking advantage of an imbalance of power to coerce, control, manipulate or deceive a child.

They may be abused by an adult or adults or by another child or children. All school and college staff should be aware that abuse, neglect, exploitation and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

The following are the definitions of abuse, neglect or exploitation as set out in Working Together to Safeguard Children (2023).

The ultimate responsibility to assess and define the type of abuse a child or young person may be subject to is that of the Police and Children's Services – our responsibility is to understand what each category of abuse is and how this can impact on the welfare and development of children and where we have concerns that a child or young person may be at risk of abuse and neglect (one or more categories can apply) to take appropriate action as early as possible.

Abuse

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, including where they see, hear, or experience its effects. Children may be abused in a family or in an institutional or extra-familial contexts 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 another child or children.

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.

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. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing, and shelter (including exclusion from home or abandonment)
- protect a child from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate caregivers)
- ensure access to appropriate medical care or treatment
- provide suitable education

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs

Sexual abuse

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts, such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Emotional abuse

The persistent emotional maltreatment of a child so as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them, or making fun of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Maltreatment

All forms of physical and/or emotional ill-treatment, sexual abuse, neglect, or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power.

22 Appendix D – Other safeguarding risks to children

In addition to the types of abuse described in Appendix B, there are other areas of safeguarding that the organisation has to be aware of. These include:

Child Sexual Exploitation (CSE) and Trafficking

Involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Female Genital Mutilation (FGM)

Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. (See Keeping Children Safe in Education Appendix A)

All types of bullying including cyberbullying and sexting

Tute has a separate Anti-Bullying policy.

Forced marriage

Not the same as an arranged marriage, as it involves coercion and force and a marriage based on free choice. It affects both males and females. From February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

Domestic violence, Gender-based violence/violence against women and girls (VAWG) and teenage relationship abuse involves any incident or pattern of incidents of controlling, coercive, threatening behavior, violence or abuse between those who are, or

have been in relationships or family members regardless of gender or sexuality and is applicable to teenagers engaged in abusive relationships

Gangs and youth violence

Teachers and designated staff have a range of powers in relation to sanction to tackle problems, including violence, in the school environment. Such powers cover disciplinary actions, the power to restrain violent pupils, and the power to search pupils for prohibited items.

Drugs

As part of school's duty to promote pupils' wellbeing, we have a role to play in preventing drug misuse as part of our pastoral responsibilities (health and wellbeing/Healthy Schools) and to support the Governments drug strategy (2010) to provide information, advice and support to pupils via the curriculum

Fabricated or induced illness

This supplementary guidance Safeguarding Children in whom Illness is Fabricated or Induced (2008) sets out a national framework within which agencies and professionals at local level – individually and jointly – draw up and agree upon their own more detailed ways of working together where illness may be being fabricated or induced in a child by a carer who has parenting responsibilities for them

Child and Adolescent Mental Health

Good mental health and resilience are fundamental to our children's physical health, relationships, education and to achieving their potential.

Faith abuse

The National Action Plan to Tackle Child Abuse Linked to Faith or Belief is intended to help raise awareness of the issue of child abuse linked to faith or belief and to encourage practical steps to be taken to prevent such abuse.

Radicalisation

The organisation is aware of its responsibilities under the Counter Terrorism and Security Act 2015, specifically Section 26, and the Prevent Strategy to safeguard pupils who are at risk of radicalisation by identifying and risk assessing individual who may be drawn into terrorism, violent or non-violent extremism. We provide a safe environment for our pupils to explore, understand and discuss sensitive topics including terrorism and extremist ideology. We use the curriculum and pastoral support to educate our pupils and to enable them to challenge these ideas. Staff are aware of the risk posed by other

students and adults who may have been radicalised and the impact of radicalisation via social media. Staff have received appropriate training and have the knowledge and confidence to identify pupils at risk of being drawn into terrorism and extremism and challenge extremist ideals. Our IT filters are regularly reviewed in order to prevent access to terrorist and extremist materials on line at the school.

Private Fostering

Arrangements made privately for the care of a child under the age of 16 (under 18, if disabled) by someone other than a parent or close relative with the intention that it should last for 28 days or more. A relative, under the Children Act 1989, is a grandparent, brother, sister, uncle or aunt (whether of the full or half blood or by marriage) or step-parent. A private foster carer may be a friend of the family, the parent of a friend of the child, or someone previously unknown to the child's family who is willing to privately foster a child. The period for which the child is cared for and accommodated by the private foster carer should be continuous, but that continuity is not broken by the occasional short break.

[Any School/Organisation] has a responsibility to refer to Children's Services any private fostering arrangement. Children's Services will undertake an assessment to ensure the needs and welfare of the child or young person is being met and that adults caring for them have access to advice and support.

Online Sexual Abuse

The use of technology to manipulate, exploit, coerce or intimidate a child to (but not limited to): engage in sexual activity; produce sexual material/content; force a child to look at or watch sexual activities; encourage a child to behave in sexually inappropriate ways; or groom a child in preparation for sexual abuse (either online or offline). It can also involve directing others to, or coordinating, the abuse of children online. As with other forms of sexual abuse, online abuse can be misunderstood by the child and others as being consensual, occurring without the child's immediate recognition or understanding of abusive or exploitative conduct. In addition, fear of what might happen if they do not comply can also be a significant influencing factor. No child under the age of 18 can consent to being abused or exploited. Financial gain can be a feature of online child sexual abuse, it can involve serious organised crime and it can be carried out by either adults or peers.

Upskirting typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence.

Attendance Schools, including Academies and Free Schools, must monitor pupils' attendance through their daily register. Schools should agree with their local authority the intervals in which they will inform local authorities of the details of pupils who are regularly absent from school or have missed 10 school days or more without permission. Schools must also notify the authority if a pupil is to be deleted from the admission register in certain circumstances⁶. Pupils who remain on a school roll are not necessarily missing education but schools should monitor attendance and address it when it is poor. Schools also have safeguarding duties under section 175 of the Education Act 2002 in respect of their pupils, and as part of this should investigate any unexplained absences. Academies and independent schools have a similar safeguarding duty for their pupils. Where reasonably possible schools and colleges should hold more than one emergency contact number for their pupils and students.

Serious Violence All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in 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.

Additional information about key safeguarding areas can also be found in Keeping Children Safe in Education (2024).

23 Appendix E – Safeguarding crib sheet

[Bookmark this document to enable quick access.](#)

Responding to a disclosure	
Do	Do not
✓ Listen and continue to listen	✗ Question or investigate
✓ Explain what will happen next	✗ Pass judgement or draw conclusions
✓ Report all concerns to Tute's DSL	✗ Promise confidentiality
✓ Record details accurately on the incident log within the hour	✗ Communicate privately with children or young people
✓ Keep yourself safe	✗ Inform by insecure email
✓ Log out of the platform and lock laptops when not in use	✗ Keep concerns about other adults to yourself
✓ Always believe that children and young people are telling the truth	✗ Discourage children or young people who want to talk to you about attitudes or behaviour of others
✓ Make yourself aware of the indicators of the four categories of abuse: physical, emotional, sexual, neglect. Also FGM, child sexual exploitation, drug abuse and the PREVENT duty	✗ Look shocked or show distaste about what a child or young person is telling you

Good practice guide

▶ TREAT all children and young people with respect.	▶ AVOID inappropriate conduct in speech or action.	▶ RESPECT the rights of individuals to privacy and dignity.	▶ CHALLENGE unacceptable behaviour.
▶ BE CAUTIOUS when discussing sensitive issues with children and young people.	▶ ENSURE that you have read all policies and procedures and ask questions if you are unsure about anything.		

24 Appendix F – Learning Cloud default slide



Welcome to your Tute lesson

While your teacher is getting today's lesson ready, here's a recap on what we expect in lessons

— Tute teachers will:

- Plan engaging lessons to help you make progress and grow in confidence
- Arrive early to lessons to greet you as you log in
- Not tolerate any disrespectful behaviour
- Ensure you communicate respectfully
- Follow Tute's behaviour for learning process
- Share your progress and engagement with you after every lesson

— We expect you to:

- Attend all lessons on time and stay until the end
- Complete all work asked by your teacher
- Respect everyone: be kind, open-minded, and value people's differences
- Share ideas, listen well, and show empathy
- Let your teacher know if you need support
- **TRY YOUR BEST!**

— Safeguarding

This means keeping you safe. It is our priority. We will always tell your school if we are concerned about your wellbeing.

Do not share any personal information

It's important you **do not** share personal information during a Tute lesson or in Tute's Learning Base that could allow another individual to contact you, either online or offline, e.g:

Address | Telephone numbers | Social media | Gaming handles

If you have **any concerns** about yourself or someone else in your class, let your teacher know or email safeguarding@tute.com; more support is available on the **Student Hub**.

StudentHub ✨

hub.tute.com/student-hub

Your Student Hub has everything to help you succeed!
video guides | staying safe | support for you | latest updates