Safeguarding and Child Protection Policy for an Employment Business Supplying Tutors

National Tutor Supply

For tutoring delivered online, in homes, at National Tutor Supply premises and in schools/education settings

Policy owner	National Tutor Supply
Designated Safeguarding Lead (DSL)	Vasiliki Kontou
Safeguarding contact	contact@tutorsupply.net
Effective date	1 September 2026
Review date	By 1 September 2027, or earlier following legal/guidance or service changes
Applies to	All staff, self-employed tutors, contractors, workers, volunteers and anyone acting for or supplied by National Tutor Supply

SAFEGUARDING IS EVERYONE'S RESPONSIBILITY

Emergency and safeguarding contacts

If a child is in immediate danger or a crime is in progress, call 999. Do not delay an emergency response in order to contact National Tutor Supply first.

Concern / service	Contact	When to use
National Tutor Supply DSL	Vasiliki Kontou | contact@tutorsupply.net	All National Tutor Supply safeguarding concerns, disclosures, incidents and low-level concerns.
Emergency	999	Immediate danger, urgent medical risk, or crime in progress.
Police non-emergency	101	Crime/safeguarding matter requiring police attention but not an emergency.
Together for Children Sunderland - Children's Safeguarding	0191 561 7007	Sunderland child safeguarding referrals during published office hours.
Sunderland Emergency Duty Team	0191 520 5560	Out-of-hours Sunderland safeguarding concerns.
Sunderland Designated Officer (LADO function)	Via Together for Children Designated Officer referral process	Allegations/concerns about an adult who works or volunteers with children in Sunderland.
NSPCC Helpline	0808 800 5000	Independent safeguarding advice for adults concerned about a child.
Childline	0800 1111	Free confidential support for children and young people.

Important terminology: within National Tutor Supply, Vasiliki Kontou is the Designated Safeguarding Lead (DSL). The Sunderland Designated Officer, commonly referred to as the LADO function, is a separate local-authority safeguarding role that manages allegations concerning adults who work or volunteer with children.

1. Purpose, status and scope

National Tutor Supply is committed to safeguarding and promoting the welfare of every child who receives, encounters or may be affected by its services. A child is anyone under the age of 18.

This policy sets the minimum safeguarding standards for National Tutor Supply and applies to all work arranged, supplied, introduced, managed or delivered through National Tutor Supply, including one-to-one and group tuition, online tuition, home tuition, tuition on National Tutor Supply premises, work in schools and colleges, assessment or educational support, and communication connected with those services.

It applies irrespective of the contractual status of the adult concerned. References to 'tutor' include self-employed tutors, workers, contractors, teachers, assessors and any other person supplied or engaged by National Tutor Supply to work with children.

Where a tutor works in a school or college, the school's or college's safeguarding and child-protection procedures also apply. The tutor must follow the host setting's reporting arrangements immediately and must also notify National Tutor Supply's DSL unless doing so would conflict with police, children's social care or Designated Officer instructions.

Keeping Children Safe in Education (KCSIE) is statutory guidance for schools and colleges rather than a standalone statutory code for private tutoring businesses. National Tutor Supply nevertheless aligns this policy with KCSIE 2026 where relevant, particularly when supplying tutors into schools. For National Tutor Supply's private tuition activity, the Department for Education's out-of-school settings safeguarding guidance is directly relevant sector guidance.

1A. National Tutor Supply's employment business model

For the purposes of assignments operated under National Tutor Supply's employment business model, National Tutor Supply acts as an employment business within the recruitment-sector framework and supplies a tutor/work-seeker to a hirer/client to undertake an assignment. Depending on the assignment, the hirer may be a parent/carer, school, college, local authority, organisation or other client.

This safeguarding policy must therefore be read alongside the Employment Agencies Act 1973 and the Conduct of Employment Agencies and Employment Businesses Regulations 2003 (Conduct Regulations). The safeguarding duties in this policy do not replace National Tutor Supply's duties as an employment business. Where the Conduct Regulations impose a higher or more specific requirement, National Tutor Supply will follow that requirement.

For Conduct Regulations purposes, a person under 18 is a vulnerable person. A work-seeker cannot opt out of the Conduct Regulations for an assignment involving work with vulnerable people, even where the work-seeker operates through a limited company or would otherwise be capable of opting out.

National Tutor Supply remains responsible for carrying out its own pre-supply checks, obtaining assignment information, providing required information to the hirer and tutor, responding to suitability information and keeping compliance records. A parent, school or other hirer may have its own safeguarding responsibilities, but those responsibilities do not transfer National Tutor Supply's statutory employment-business duties to the hirer.

2. Safeguarding principles

- The child's welfare is paramount.
- Safeguarding is everyone's responsibility. Concerns must be acted on early and never assumed to be someone else's responsibility.
- Children should be listened to, taken seriously and treated with dignity and respect.
- No child should experience discrimination in safeguarding protection because of age, disability, sex, race, religion or belief, sexual orientation, gender reassignment, language, family circumstances, SEND, socioeconomic background or any other characteristic or circumstance.
- Children with SEND, communication needs, care experience, young carers, children affected by domestic abuse, children missing education, and other children facing additional vulnerabilities may require particular professional curiosity and adapted communication.
- National Tutor Supply adopts a child-centred approach and will consider the child's wishes and feelings while recognising that confidentiality cannot be promised where safety is at stake.
- Safeguarding information will be shared lawfully, proportionately and on a need-to-know basis. Data protection law is not a barrier to necessary safeguarding information sharing.
- Concerns may arise inside or outside tutoring, online or offline, at home, in school, in the community or through another professional or family member.

3. Legal and guidance framework

This policy has been developed with reference to the law and current national and local safeguarding framework applicable in England, including:

- Children Act 1989 and Children Act 2004;
- Education Act 2002 where relevant to schools and colleges;
- Safeguarding Vulnerable Groups Act 2006, as amended;
- Protection of Freedoms Act 2012;
- Sexual Offences Act 2003, including positions of trust provisions where applicable;
- Domestic Abuse Act 2021;
- Counter-Terrorism and Security Act 2015 and current Prevent guidance, where applicable;
- Equality Act 2010;
- Human Rights Act 1998;
- Data Protection Act 2018 and UK GDPR;
- Working Together to Safeguard Children 2026;
- Keeping Children Safe in Education 2026, effective 1 September 2026, where relevant to school/college work;
- Department for Education Out-of-school settings: safeguarding guidance for providers, updated February 2026;
- Information sharing advice for safeguarding practitioners, 2024;
- current Disclosure and Barring Service eligibility, regulated activity and referral guidance; and
- Sunderland Safeguarding Children Partnership (SSCP) multi-agency procedures, thresholds and local referral arrangements.

Employment business-specific framework:

- Employment Agencies Act 1973;
- Conduct of Employment Agencies and Employment Businesses Regulations 2003, as amended, including Regulations 18, 19, 20, 21, 22 and 29;
- current Fair Work Agency guidance for employment agencies and employment businesses; and
- current DBS guidance applying to personnel suppliers, including employment businesses.

4. Governance and safeguarding leadership

4.1 Designated Safeguarding Lead

National Tutor Supply's Designated Safeguarding Lead (DSL) is Vasiliki Kontou. The DSL has lead operational responsibility for safeguarding and child protection within National Tutor Supply.

- receiving and assessing safeguarding concerns and disclosures;
- deciding, without unnecessary delay, whether referral or consultation with children's social care, police, the Sunderland Designated Officer or another agency is required;
- maintaining secure safeguarding records and a clear chronology of decisions and actions;
- supporting tutors and staff to understand and follow this policy;
- liaising with schools, local authorities, safeguarding partners, police and DBS where required;
- managing allegations and low-level concerns about adults, while obtaining external advice where required;
- ensuring safeguarding training and policy updates are maintained;
- reviewing patterns of concerns, complaints, incidents and safer-working issues; and
- reviewing this policy at least annually and sooner where guidance, law, local arrangements or National Tutor Supply's services change.

4.2 If the concern is about the DSL

A concern or allegation about Vasiliki Kontou must not be handled solely by Vasiliki Kontou. The person receiving the concern should contact the relevant local authority Designated Officer/LADO function and, where appropriate, children's social care or police directly. If the concern relates to work in a school, the school's headteacher/principal or chair/proprietor route must also be followed as required by that setting's policy.

5. Recognising abuse, neglect and safeguarding concerns

Tutors are not expected to diagnose abuse. They are expected to notice, listen, record and report. A single sign may not establish abuse, but concerns should be considered in context and patterns must not be ignored.

5.1 Core categories

- Physical abuse: deliberately causing physical harm, including hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or otherwise causing physical injury.
- Emotional abuse: persistent emotional maltreatment that adversely affects a child's emotional development, including humiliation, intimidation, rejection, severe bullying, coercive or controlling behaviour, or exposing a child to harmful treatment of others.
- Sexual abuse: forcing or enticing a child to take part in sexual activities, whether or not the child understands what is happening, including contact and non-contact abuse, online abuse, sexual images and exploitation.
- Neglect: persistent failure to meet a child's basic physical or psychological needs, likely to result in serious impairment of health or development.

5.2 Wider safeguarding issues

National Tutor Supply expects tutors to remain alert to wider safeguarding risks including, where relevant:

- child sexual exploitation and child criminal exploitation, including county lines;
- grooming, trafficking, modern slavery and exploitation;
- domestic abuse and the impact on children who see, hear or experience its effects;
- child-on-child abuse, including bullying, cyberbullying, sexual violence, sexual harassment, coercion, abuse in intimate personal relationships, initiation/hazing and prejudice-based abuse;
- online abuse, harmful content, sextortion, sharing of nude or semi-nude images, sexualised communication and unsafe contact with adults or peers;
- female genital mutilation (FGM), forced marriage and so-called honour-based abuse;
- radicalisation and susceptibility to extremist influence;
- self-harm, suicidal behaviour or serious mental-health concerns where these create a safeguarding risk;
- children missing education, unexplained absence or concerning changes in attendance where relevant to the tutoring relationship;
- fabricated or induced illness; and
- any behaviour by an adult working with children that may indicate harm, risk of harm, a criminal offence involving a child, or unsuitability to work with children.

6. What to do if a child discloses abuse or a concern arises

The tutor's role is to respond supportively and report, not to investigate.

1. Listen carefully. Give the child time and do not express disbelief, shock or blame.
2. Do not promise confidentiality. Explain that information may need to be shared with people whose job is to help keep them safe.

3. Ask only enough open questions to clarify what the child is saying, for example 'Tell me what happened'. Do not ask leading, repeated or investigative questions.
4. Do not confront the alleged perpetrator, contact them for an explanation, or attempt to gather evidence.
5. If there is immediate danger, call 999. If urgent medical treatment is required, obtain emergency assistance.
6. Report the concern to the National Tutor Supply DSL as soon as possible and on the same day. Where a child may be at immediate or significant risk, make or support a direct referral to children's social care/police without waiting for internal approval.
7. Make a factual written record as soon as possible, using the child's own words where possible. Record date, time, location, people present, what was seen/heard, questions asked, actions taken and who was informed.
8. Preserve relevant evidence, including messages, emails, platform records or screenshots where lawful and safe. Do not circulate safeguarding material unnecessarily.

A tutor must never delay a referral because the DSL is unavailable. Anyone can contact children's social care or police directly where necessary. In Sunderland, concerns about significant harm can be referred to Together for Children's Integrated Contact and Referral Team.

7. Referral thresholds and local Sunderland procedure

7.1 Immediate danger

Call 999 where a child is in immediate danger, there is an immediate threat of serious harm, or urgent police/medical intervention is required.

7.2 Significant harm or safeguarding referral

For a child living in Sunderland, contact Together for Children Children's Safeguarding on 0191 561 7007 during published office hours. The Sunderland Emergency Duty Team is 0191 520 5560 out of hours. Professionals should follow the current Sunderland referral form and SSCP Thresholds of Need guidance. Where there is reasonable cause to suspect significant harm, a telephone referral should not be delayed by completion of paperwork.

7.3 Children outside Sunderland

Where the child lives outside Sunderland, the referral must normally be made to the children's social care service for the local authority in which the child lives. If the child is in immediate danger, call 999 regardless of location.

7.4 Escalation

If National Tutor Supply remains concerned after a referral or believes the response does not adequately protect the child, the DSL will use the relevant local safeguarding partnership escalation or professional-challenge procedure. The case will not simply be closed because another agency has been informed.

8. Allegations and concerns about tutors, staff or other adults

All concerns about an adult working with children must be taken seriously. National Tutor Supply distinguishes between allegations that may meet the harm threshold and lower-level concerns that do not appear to meet that threshold but may nevertheless be inconsistent with expected professional conduct.

8.1 Harm-threshold allegations

The local authority Designated Officer/LADO function should be consulted where an adult who works or volunteers with children has behaved in a way that has harmed or may have harmed a child; may

have committed a criminal offence against or related to a child; may pose a risk of harm to children; or has behaved in a way that may indicate they are unsuitable to work with children.

For work connected with Sunderland, National Tutor Supply will use Together for Children's Designated Officer referral process. National Tutor Supply will not carry out a substantive internal investigation before obtaining advice where doing so could compromise a police, social-care or Designated Officer process.

8.2 Immediate protective action

National Tutor Supply may pause, suspend or alter assignments and access to children while concerns are assessed. Suspension is a neutral protective measure and is not, by itself, a finding of wrongdoing. Decisions will be proportionate to risk and informed by the relevant external agencies where appropriate.

8.3 Low-level concerns

A low-level concern is any concern, however small, that an adult may have acted in a way that is inconsistent with National Tutor Supply's code of conduct, including conduct outside work that may be relevant, even where the behaviour does not appear to meet the harm threshold. Examples can include over-familiarity, inappropriate private messaging, favouritism, boundary breaches or humiliating language.

Low-level concerns must be reported to the DSL, recorded confidentially and reviewed for patterns. If information indicates that the harm threshold may be met, the Designated Officer route will be used.

8.4 Concern about a person working in a school

Where an allegation concerns a National Tutor Supply tutor working in a school or college, the tutor/client setting and National Tutor Supply must cooperate. The host setting's headteacher/principal/DSL procedures and local Designated Officer arrangements must be followed. National Tutor Supply will provide relevant information lawfully and promptly.

9. DBS, barred-list checks and safer recruitment

National Tutor Supply will determine the legally appropriate DBS level for each role by reference to the actual duties, frequency, setting and current DBS eligibility guidance. National Tutor Supply will not request a level of DBS check that the role is not legally eligible for.

Where a role constitutes regulated activity with children and the law permits it, National Tutor Supply will obtain or require an Enhanced DBS check with Children's Barred List information before the person undertakes that regulated activity, subject to any lawful risk-managed exception.

From 1 September 2026, the supervision exemption from regulated activity with children is removed for relevant teaching, training, instruction, care and supervision carried out often enough or overnight. National Tutor Supply will assess roles under the rules in force at the time and update checks where required.

Safer recruitment and onboarding will include, as appropriate to the role:

- identity verification;
- right-to-work checks;
- verification of relevant qualifications and professional status;
- employment/engagement history and exploration of material gaps where appropriate;
- references appropriate to the role;
- DBS and barred-list checks at the legally appropriate level;
- overseas criminal-record or equivalent checks where appropriate and available;
- consideration of safeguarding information disclosed through recruitment;

- safeguarding induction, code of conduct and confirmation that this policy has been read and understood; and
- ongoing suitability review where concerns or new information arise.

A DBS certificate is one part of safer recruitment. A clear certificate does not remove the need for professional vigilance, references, identity checks, supervision, training and appropriate conduct.

10. DBS barring referrals: National Tutor Supply's legal responsibilities

Because National Tutor Supply operates as an employment business/personnel supplier in relevant arrangements, it may have a legal duty to refer an individual to the Disclosure and Barring Service where the statutory referral conditions are met. This duty is separate from referrals to children's social care, police, the Designated Officer or a professional regulator.

Where National Tutor Supply removes a person from regulated activity, or would have removed them had they not resigned or otherwise ceased the work, and the relevant conduct/harm-test or other statutory referral criteria are met, the DSL will ensure a DBS referral is considered and made where legally required. A person leaving National Tutor Supply does not end the safeguarding process.

10A. Employment business safeguarding and suitability duties

10A.1 Information National Tutor Supply must obtain from the hirer

Before supplying a tutor, National Tutor Supply will obtain the assignment information required by Regulation 18, including the hirer's identity and nature of business where applicable, proposed start date and duration, position and type of work, location, days and hours, known health and safety risks and the steps taken to control them, and the experience, training, qualifications or authorisations required by the hirer, law or a professional body.

For home or online tuition arranged by a parent/carer, National Tutor Supply will adapt the assignment record to the context while still recording the information relevant to the statutory requirements, including the identity of the hirer, child, location or online arrangement, lesson pattern, foreseeable safeguarding or safety risks and any required qualifications or authorisations.

10A.2 Confirmations about the tutor/work-seeker

Under Regulation 19, National Tutor Supply will not introduce or supply a tutor unless it has confirmed the tutor's identity, relevant experience, training, qualifications and authorisations required for the assignment, including right-to-work requirements, and has confirmed that the tutor is willing to undertake the assignment. Evidence of the checks will be retained.

Where a tutor provides services through a limited company, National Tutor Supply will apply the relevant Conduct Regulations checks to the company and the individual who will actually perform the tutoring work, as required.

10A.3 Additional requirements for children and vulnerable persons

Because every person under 18 falls within the Conduct Regulations definition of a vulnerable person, National Tutor Supply will apply Regulation 22 to assignments involving children.

Before introduction or supply, National Tutor Supply will obtain two written references from people who are not related to the tutor and who have agreed that their references may be shared with the hirer. National Tutor Supply will also obtain copies of qualifications and authorisations required by law, a professional body or the hirer. This may include an appropriate DBS certificate, professional registration, right-to-work evidence or other role-specific authorisation.

National Tutor Supply will offer the relevant references and required qualification/authorisation documents to the hirer before introduction or supply, subject to lawful data-protection handling.

If National Tutor Supply has been unable to obtain all information required by Regulation 22, supply will not proceed as though the checks were complete. Where the Regulations permit supply to proceed, National Tutor Supply will first tell the hirer what information could not be obtained, the steps taken to obtain it, and that the hirer may inspect the documents that were obtained. The decision and communication will be recorded. National Tutor Supply may apply a stricter internal rule and decline to supply where safeguarding risk is not acceptable.

10A.4 Information provided to the hirer and tutor

National Tutor Supply will comply with Regulation 21 by providing the hirer with the required information obtained about the proposed tutor and by providing the tutor with the required assignment information. Where information is initially given verbally, National Tutor Supply will provide written confirmation within the statutory period where required.

Safeguarding-sensitive information will be limited to what is relevant and necessary. The employment-business information-sharing duty does not authorise unnecessary disclosure of a child's confidential information.

10A.5 Suitability concerns arising after supply

Regulation 20 applies throughout the supply relationship. National Tutor Supply will take all reasonably practicable steps to ensure that a placement is not detrimental to the interests of the tutor/work-seeker or hirer.

If National Tutor Supply receives information indicating that a tutor may be unsuitable for the assignment, but the position is not yet established, National Tutor Supply will without delay inform the hirer, make appropriate enquiries or investigations, and update the hirer with the enquiries made and information obtained. Safeguarding referrals to the Designated Officer/LADO function, children's social care or police will be made in parallel where the applicable threshold is met.

If information establishes that the tutor is unsuitable for the assignment, National Tutor Supply will end the supply without delay. Current Fair Work Agency guidance describes this as the same day or, where that is not reasonably practicable, the next business day. National Tutor Supply will take any further safeguarding, contractual, DBS or regulatory action required.

An internal investigation must not compromise or delay a police, children's social care or Designated Officer/LADO process. National Tutor Supply will follow external safeguarding directions where these affect the timing or scope of its enquiries.

10A.6 DBS referral duty as a personnel supplier

An employment business supplying individuals to undertake regulated activity can be a personnel supplier for DBS purposes. National Tutor Supply will therefore consider its statutory DBS barring-referral duty whenever a tutor is removed from regulated activity, or would have been removed had they not resigned, ceased accepting assignments or otherwise left, and National Tutor Supply considers that the relevant conduct, harm-test or other statutory referral criteria are met.

A DBS referral is separate from a referral to children's social care, police, the local authority Designated Officer/LADO function, a school or a professional regulator. Making one referral does not remove the need to consider the others.

National Tutor Supply will gather sufficient evidence and complete the appropriate safeguarding/contractual investigation, subject to external-agency directions, before determining whether the statutory DBS referral conditions are met. A tutor leaving the business will not be used to avoid or discontinue a required safeguarding process.

10A.7 Employment business compliance records

National Tutor Supply will keep records sufficient to demonstrate compliance with the Employment Agencies Act 1973 and Conduct Regulations, including relevant records concerning work-seekers, hirers, assignment information, identity and suitability checks, references, qualifications/authorisations, information supplied to both parties, and action taken when suitability concerns arise.

Conduct Regulations records will be retained for at least the statutory minimum period. Safeguarding records may need to be retained for longer under National Tutor Supply's safeguarding, legal, insurance, limitation and regulatory retention requirements. The safeguarding retention decision will not be shortened merely because the Conduct Regulations minimum period has expired.

11. Tutor code of safe conduct and professional boundaries

All tutors must maintain clear, child-centred professional boundaries. Tutors must:

- treat children with dignity, fairness and respect;
- use age-appropriate, non-discriminatory and professional language;
- avoid unnecessary physical contact and never use corporal punishment;
- never develop or encourage a sexual, romantic or otherwise inappropriate relationship with a child;
- never exchange sexualised, suggestive, secretive or personally intimate messages with a child;
- never ask a child to keep a relationship, communication, gift or meeting secret from a parent/carer or National Tutor Supply;
- not give or accept significant personal gifts, money or favours outside approved arrangements;
- not transport a child in a private vehicle unless specifically authorised under a risk-assessed arrangement;
- not consume alcohol or illegal drugs before or during tutoring, and not tutor while impaired;
- not photograph, film or record a child except where expressly authorised for a legitimate National Tutor Supply purpose with the required consent and safeguards;
- not connect with children through personal social-media accounts;
- use National Tutor Supply-approved or professionally appropriate communication channels;
- report accidental boundary breaches, concerning communications or situations that could be misinterpreted; and
- challenge and report unsafe or inappropriate conduct by others.

12. Home tuition and one-to-one tuition

One-to-one tuition in a private home creates particular safeguarding and allegation-management risks. National Tutor Supply therefore requires clear arrangements before the assignment begins.

- The parent/carer must know the tutor's identity and the agreed lesson arrangements.
- For children under 16, a parent/carer or another responsible adult should normally be present in the home or immediately available unless National Tutor Supply has explicitly agreed and risk-assessed another arrangement.
- For 16- and 17-year-olds, arrangements may allow greater independence, but the child remains a child for safeguarding purposes and parental/carer involvement should be proportionate to the circumstances.
- Lessons should take place in an appropriate working area. Wherever practicable, avoid bedrooms and other highly private spaces.
- Doors should not be locked in a way that prevents reasonable access by the parent/carer.
- The tutor must not provide personal care unless the role, training, checks and written arrangements expressly cover it.

- Unexpected changes to location, collection arrangements or the presence of unknown adults should be assessed before the lesson continues.
- Any concern about the home environment, another adult, the child, or the tutor's own safety must be reported to the DSL.

13. Online tutoring and digital safeguarding

Online tuition is subject to the same safeguarding standards as face-to-face tuition. Technology must not create a private or secret relationship between tutor and child.

- Use National Tutor Supply-approved or agreed professional accounts/platforms rather than personal social-media accounts.
- Parents/carers should be informed of the platform, schedule and normal communication arrangements.
- For younger children, a parent/carer should be available and know when the session starts and finishes. National Tutor Supply may require adult presence depending on age, vulnerability and risk.
- Tutors and pupils should use an appropriate location and background. Bedrooms should be avoided where practicable.
- Private messaging outside the educational purpose and agreed channels is prohibited.
- Screen sharing must be controlled so personal, confidential or inappropriate material is not inadvertently displayed.
- Tutors must report sexualised behaviour, exposure to harmful material, suspected grooming, coercion, sextortion, threats, or concerning third-party presence immediately.
- Recordings must not be made routinely simply because a lesson is online. Any recording requires a defined lawful purpose, appropriate privacy information/consent where required, secure storage, controlled access and a retention period. Safeguarding evidence must be preserved where necessary and must not be deleted merely because the ordinary retention period expires.
- Tutors must never ask a child to send nude or semi-nude images. If such material is disclosed or encountered, the tutor must not forward, print, copy or unnecessarily view it and must seek immediate safeguarding advice.

Where online sexual abuse or exploitation is suspected, National Tutor Supply may also direct the child/parent to the Child Exploitation and Online Protection reporting service, alongside any required police or children's social care referral.

14. Child-on-child abuse

National Tutor Supply does not dismiss harmful behaviour between children as 'banter', 'part of growing up' or an inevitable feature of peer relationships. Child-on-child abuse can occur between children of any age or sex and can happen online or offline.

Reports will be assessed for immediate safety, victim support, risk to other children, the needs of the child alleged to have caused harm, and whether referral to children's social care or police is required. Parents/carers will normally be involved unless doing so may increase risk or conflict with external-agency advice.

Where National Tutor Supply is delivering services in a school, the school's child-on-child abuse and behaviour procedures must also be followed.

15. Sexual violence, sexual harassment and sexualised behaviour

Sexual violence and sexual harassment are never acceptable. National Tutor Supply will take reports seriously, avoid victim-blaming, protect confidentiality as far as possible and consider the wishes of the child alongside the need to safeguard them and others.

A tutor must not mediate an allegation of sexual abuse between children or ask the children to resolve it themselves. The matter must be referred to the DSL and, where appropriate, children's social care and police.

16. Online sexual images, sexting and sextortion

Where a tutor becomes aware that a child has created, shared or been pressured to share nude or semi-nude imagery, or is being blackmailed or threatened in connection with sexual content, the tutor must report immediately to the DSL. The tutor should not request the image, save copies to personal devices, forward it, or conduct their own investigation.

Where there is immediate danger, extortion, adult involvement, suspected grooming or a suspected sexual offence, police and/or children's social care should be contacted without delay.

17. Domestic abuse

Children can be victims of domestic abuse in their own right. A child may see, hear or experience the effects of abuse even if they are not physically assaulted. Tutors should report disclosures, injuries, fear, coercive control, concerning home incidents or patterns suggesting domestic abuse. National Tutor Supply will consider the safety of both the child and non-abusive parent/carer when deciding what information can safely be shared.

18. FGM, forced marriage and honour-based abuse

Concerns about FGM, forced marriage or so-called honour-based abuse are safeguarding matters and must be reported immediately to the DSL. Where a regulated professional is personally subject to a specific statutory reporting duty, that duty must be followed in addition to National Tutor Supply procedures. In an emergency, call 999. Family or community members must not be contacted where doing so may increase risk.

19. Radicalisation and Prevent

National Tutor Supply recognises that susceptibility to radicalisation is a safeguarding concern. Private tutoring businesses are not automatically subject to the statutory Prevent duty merely because they provide tuition. However, National Tutor Supply will act on concerns about radicalisation as part of its safeguarding responsibilities and will cooperate with schools, local authorities and other specified authorities that are subject to the Prevent duty.

Concerns should be reported to the DSL. The DSL will consider whether children's social care, police or a Prevent referral is appropriate. Emergency terrorist threats should be reported to police immediately.

20. Mental health, self-harm and suicide risk

Tutors are not expected to provide clinical assessment. However, significant changes in behaviour, disclosures of self-harm, suicidal thoughts, eating-related risk or serious emotional distress may indicate a safeguarding concern. The tutor must listen, report promptly and seek emergency assistance where there is an immediate risk to life or serious injury.

Parents/carers will normally be informed, but this may be delayed or managed differently if informing them could increase the child's risk. The DSL will seek appropriate safeguarding or health advice.

21. Missing children and attendance concerns

National Tutor Supply will not treat repeated unexplained absence, sudden disengagement or inability to contact a child as merely an administrative issue where there are additional indicators of risk. Concerns should be reported to the DSL and, for school-commissioned work, to the school's DSL in accordance with the school's procedures.

22. SEND, disability and additional vulnerability

Children with SEND or disabilities may face additional safeguarding barriers, including communication difficulties, greater dependence on adults, assumptions that signs of abuse relate to disability, and increased risk of bullying or isolation. Tutors must avoid such assumptions and ensure the child's method of communication is respected.

Reasonable adjustments should support the child to understand safeguarding information, express concerns and participate in decisions affecting them.

22A. Responsibilities of the hirer under the employment business arrangement

The hirer/client must give National Tutor Supply accurate information needed to assess and administer the assignment, including safeguarding and health-and-safety information relevant to the work, the child's needs, the location or online arrangements, and any experience, training, qualification or authorisation requirements.

The hirer must promptly tell National Tutor Supply about any safeguarding concern, complaint, allegation, boundary concern or information that may indicate the tutor is unsuitable. The hirer should not privately resolve a serious safeguarding allegation with the tutor or allow a tutor to continue solely because the hirer is satisfied with the tutor's explanation.

Where the hirer is a school, college or organisation, it must provide the tutor with its relevant safeguarding procedures, emergency arrangements, site information and DSL/reporting route. National Tutor Supply and the hirer will cooperate with statutory safeguarding agencies and share relevant information lawfully.

Where the hirer is a parent/carer, ordinary lesson communication may take place directly between parent/carer and tutor where authorised, but safeguarding concerns, material complaints, changes affecting suitability and serious incidents must also be reported to National Tutor Supply. Direct operational contact does not remove National Tutor Supply from the employment-business relationship.

23. Parents and carers

National Tutor Supply expects parents and carers to support safe tutoring arrangements. They should:

- provide accurate emergency and relevant safeguarding/medical information needed for safe tuition;
- tell National Tutor Supply about relevant changes to collection, access, court orders or contact arrangements where these affect the tutoring service;
- ensure the agreed environment for home or online tuition is safe and suitable;
- use agreed channels for communication and raise concerns promptly;
- not ask tutors to keep safeguarding-relevant information secret from National Tutor Supply; and
- understand that National Tutor Supply may share information without parental consent where this is necessary and lawful to protect a child.

Parents do not carry sole responsibility for safeguarding during a National Tutor Supply session. Tutors and National Tutor Supply retain their own safeguarding responsibilities. The previous National Tutor

Supply policy placed overly broad responsibility on parents for the child's welfare during sessions; this policy removes that approach.

24. Schools, colleges and commissioning organisations

Where National Tutor Supply supplies a tutor to a school, college or other organisation, safeguarding responsibilities must be clear before work begins. National Tutor Supply will provide the information reasonably required for safer recruitment assurance and will expect the setting to provide relevant safeguarding induction, reporting routes, site procedures and DSL details.

The tutor must comply with the host setting's safeguarding policy and KCSIE-related procedures. A concern about a pupil should normally be reported immediately to the host DSL and National Tutor Supply DSL. A concern about the tutor must be reported through the host setting's allegation procedures and to National Tutor Supply.

Contractual arrangements must not prevent lawful safeguarding information sharing or referral to statutory agencies.

25. Information sharing, confidentiality and record keeping

Safeguarding information is confidential but not secret. National Tutor Supply will share relevant information where necessary to protect a child, support a safeguarding assessment, manage allegations or comply with law. Consent is not always required for safeguarding information sharing.

Records should distinguish fact, observation, allegation, professional opinion and decision. They must be dated, timed, attributable and stored securely with access limited to those who need it.

Safeguarding records will be retained in accordance with National Tutor Supply's retention arrangements, legal requirements and safeguarding need. Records relating to allegations, DBS referrals or serious child protection matters must not be routinely destroyed without considering relevant statutory, limitation, inquiry, regulatory and safeguarding requirements.

Safeguarding records should be kept separately or access-controlled from routine tutoring notes where practicable. Emailing highly sensitive safeguarding information should be limited to what is necessary and sent using secure methods.

26. Photography, video, audio and lesson recordings

No photograph, video or audio recording of a child may be made for publicity, marketing or teaching purposes without an identified legitimate purpose and the appropriate authorisation/consent and privacy arrangements. A child should also be involved in the decision in a manner appropriate to age and understanding.

Personal devices should not be used to create or retain images of children except in a genuine emergency where necessary to protect the child and where the action can be justified and reported immediately.

Images and recordings must never be published on a tutor's personal social media or used for personal portfolios without National Tutor Supply's explicit written authorisation and the required permissions.

27. Physical contact, intervention and restraint

Tutors must never use corporal punishment. Physical contact should be necessary, proportionate, appropriate to the child's needs and transparent.

A tutor should not routinely use physical restraint. In an emergency, reasonable and proportionate action may be taken to prevent immediate serious harm, consistent with the law and the circumstances. Any physical intervention must be reported to National Tutor Supply promptly and, where relevant, to

the school/setting and parent/carer. Medical assistance and external safeguarding advice must be sought where necessary.

28. Whistleblowing and professional challenge

Anyone working for or through National Tutor Supply must raise safeguarding concerns about unsafe practice, failures to act, concealment of information or inappropriate conduct. No person should suffer retaliation for raising a genuine safeguarding concern in good faith.

If a tutor believes National Tutor Supply has not acted appropriately, they should contact children's social care, the local Designated Officer, police, NSPCC or another appropriate safeguarding body directly. Safeguarding concerns must not be suppressed because of contractual, reputational or commercial considerations.

29. Training, induction and ongoing competence

Before working with children through National Tutor Supply, tutors must receive safeguarding information appropriate to their role and confirm that they have read and understood this policy and the code of conduct.

National Tutor Supply will require safeguarding training to be refreshed at appropriate intervals and will provide updates when significant safeguarding guidance changes. Tutors working in schools must complete any additional induction or training required by the host setting.

The DSL will maintain safeguarding knowledge appropriate to the role, including local referral procedures, allegation management, information sharing and DBS referral responsibilities.

30. Breaches of this policy

A breach may result in removal from an assignment, suspension from further work, termination of the contractual relationship, notification to a school/client, referral to children's social care, police, the local Designated Officer, DBS or a professional regulator, depending on the circumstances.

National Tutor Supply will not promise an automatic outcome such as permanent barring or dismissal before the relevant facts and external safeguarding advice are considered. Where a legal duty to refer exists, National Tutor Supply will make the required referral.

31. Monitoring and review

This policy will be reviewed at least annually, and sooner following a safeguarding incident, learning review, material complaint, change in law or statutory guidance, change in Sunderland local arrangements, change in National Tutor Supply's services, or evidence that procedures are not operating effectively.

The DSL will maintain an audit trail of policy approval and review. The version published to tutors, parents and commissioning organisations must be the current controlled version.

Appendix 1 - National Tutor Supply safeguarding response flowchart

1. NOTICE / RECEIVE: A child discloses, you observe a concern, or someone reports a concern.

2. IMMEDIATE SAFETY: If immediate danger or urgent crime/medical risk, call 999.

3. LISTEN / DO NOT INVESTIGATE: Reassure, do not promise secrecy, ask only minimal open questions.

4. REPORT: Contact Vasiliki Kontou, National Tutor Supply DSL, the same day. Do not wait if urgent.

5. REFER EXTERNALLY WHEN REQUIRED: Children's social care / police / Designated Officer / school DSL, according to the concern.

6. RECORD: Factual, dated and timed record, including child's words, actions and decisions.

7. PRESERVE EVIDENCE: Keep relevant communications or records secure; do not circulate them.

8. FOLLOW THROUGH: Confirm referral/action, cooperate with agencies, escalate if the child remains at risk.

Appendix 2 - Allegation about a National Tutor Supply tutor/adult

- Immediate danger or suspected urgent crime: 999.
- Do not confront the adult or conduct a substantive investigation before safeguarding advice where this could prejudice enquiries.
- Notify National Tutor Supply DSL immediately unless the allegation concerns the DSL.
- If the allegation concerns the DSL, contact the relevant local authority Designated Officer/LADO function directly.
- For Sunderland cases, use Together for Children's Designated Officer process.
- Consider immediate protective measures, including pausing assignments/contact with children.
- Cooperate with police, children's social care, Designated Officer and the commissioning school/setting.
- After the relevant process, consider contractual action, professional-regulator notification and DBS referral obligations.
- Resignation or ending an assignment does not stop the safeguarding or DBS-referral process.

Appendix 3 - Minimum safeguarding record

- Child's full name, date of birth/age and relevant contact details;
- date, time and location/platform of incident or disclosure;
- name and role of person making the record;
- exact words used by the child where possible;
- factual observations, including any visible injury without speculation;
- names of anyone present;
- questions asked and responses given;
- immediate safety action taken;
- who was informed, when and how;
- external agency contact/referral details and reference number where available;
- decision rationale, including reasons if no referral was made; and
- follow-up action and outcome known to National Tutor Supply.

Appendix 4 - External agencies and authoritative guidance

- Keeping Children Safe in Education 2026 (DfE)

- Working Together to Safeguard Children 2026 (DfE)
- Out-of-school settings: safeguarding guidance for providers (DfE)
- Guidance for parents/carers using tuition and out-of-school activities (DfE)
- Information sharing advice for safeguarding practitioners (DfE)
- DBS eligibility guidance
- DBS legal duty to refer
- Sunderland Safeguarding Children Partnership - professionals
- Together for Children - Integrated Contact and Referral Team
- Together for Children - Designated Officer
- GOV.UK - Report child abuse
- NSPCC - Reporting abuse
- Prevent referral guidance

Appendix 5 - Policy acknowledgement for tutors/workers

I confirm that I have received, read and understood the National Tutor Supply Safeguarding and Child Protection Policy 2026. I understand that I must report safeguarding concerns promptly, follow National Tutor Supply and host-setting procedures, maintain professional boundaries, and cooperate with safeguarding enquiries and referrals.

Name	
Role	
Signature	
Date	
National Tutor Supply verification	

Appendix 6 - Employment business pre-supply safeguarding checklist

☐ Hirer/client identity recorded.

☐ Assignment start date, expected duration, work, location/online format, days/hours and known health and safety risks recorded.

☐ Required experience, training, qualifications and authorisations identified.

☐ Tutor identity confirmed.

☐ Tutor right to work confirmed and evidence retained.

☐ Tutor experience, training, qualifications and authorisations checked.

☐ Tutor willingness to undertake the specific assignment confirmed.

☐ Two written, non-relative references obtained for work with a child/vulnerable person and permission to share with the hirer confirmed.

☐ Appropriate DBS eligibility assessed and required DBS/barred-list information checked where legally applicable.

☐ Required references and qualification/authorisation documents offered to the hirer.

☐ If required information is missing, Regulation 22 disclosure to the hirer completed and risk decision recorded before any supply.

☐ Regulation 21 information to hirer completed and written confirmation issued where required.

☐ Assignment information provided to tutor/work-seeker.

☐ Host-school safeguarding/DSL details obtained where the assignment is in a school/college.

☐ Tutor has acknowledged National Tutor Supply safeguarding policy and code of conduct.

☐ Safeguarding contact and allegation-reporting route confirmed to tutor and hirer.

☐ Compliance record created and retention period assigned.

Appendix 7 - Employment business response to suitability information

- INFORMATION RECEIVED: Record the information immediately and assess whether there is an urgent child-protection or criminal risk.
- IMMEDIATE RISK: Call 999 and/or make urgent safeguarding referral where required.
- MAY BE UNSUITABLE: Inform the hirer without delay; undertake appropriate enquiries; update the hirer; consult/refer to Designated Officer/LADO, children's social care or police where thresholds are met.
- UNSUITABILITY ESTABLISHED: End supply without delay and protect affected children.
- DBS / REGULATOR: Consider statutory DBS referral duty and any professional-regulator referral.
- RECORD: Keep the allegation, evidence, decisions, communications, referrals and outcome securely.
- NO COMMERCIAL OVERRIDE: Client preference, tutor resignation, contractual convenience or reputational concern must not prevent required safeguarding or employment-business action.

Document control and drafting note

This policy replaces National Tutor Supply's earlier safeguarding policy and supersedes the first 2026 safeguarding draft. It is written specifically for National Tutor Supply's employment business model

supplying tutors/work-seekers to hirers/clients, while also addressing private, online, home and school-based tuition.

Key changes include: a formal DSL role; explicit Sunderland referral and Designated Officer routes; current Working Together 2026 and KCSIE 2026 references; current out-of-school tuition guidance; updated DBS/regulated-activity provisions including the 1 September 2026 supervision change; DBS personnel-supplier referral duties; allegations and low-level concerns; child-on-child abuse; online tutoring and sexual-image risks; information sharing; Prevent/radicalisation; SEND vulnerability; and clearer responsibilities for parents, schools and National Tutor Supply.

This document is an operational safeguarding policy. It should be used alongside National Tutor Supply's privacy policy, safer recruitment/DBS procedure, tutor code of conduct, complaints procedure, online-safety arrangements and contractual documents. Where a specific legal or safeguarding issue arises, National Tutor Supply should obtain advice from the relevant statutory safeguarding body and, where necessary, qualified legal counsel.