

If you are worried about a child

- Contact our safeguarding team: safeguarding@covetutors.co.uk
- Contact the children's services team at the local authority where the child lives.
- NSPCC helpline: 0808 800 5000
- Childline (for children and young people): 0800 1111
- If a child is in immediate danger, call 999.

Do not wait for a reply from us before contacting children's services or the police if a child is at risk of harm.

1. Statement of intent

Cove Tutors provides live online tuition to children and young people. We work for parents and carers, and for schools, alternative provision (AP) settings and local authorities that commission tuition for their pupils. Cove Tutors provides part-time tuition. We are not a school and do not provide full-time education.

The welfare of every child we teach comes first. This policy sets out how we prevent harm, how we recognise it, and what we do when we are worried about a child. It applies the standards in Keeping children safe in education (the current edition) and Working Together to Safeguard Children 2023 to the way we actually work: a small team teaching online.

Our principles

- **Child-centred.** We consider what each child needs, listen to them, and take what they tell us seriously.
- **Everyone's responsibility.** Every tutor, contractor and volunteer has a duty to act on a concern. Nobody assumes someone else will deal with it.
- **It could happen here.** We do not assume that abuse only happens elsewhere, or that it cannot happen in an online lesson. We stay alert and act on what we see and hear.
- **Act early.** Early help is better than late intervention. We share small concerns rather than wait for certainty.

- **Work with others.** We work with parents and carers, commissioning schools and settings, local authority children's social care and the police to protect children.
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2. Scope

This policy applies to:

- everyone who works for or on behalf of Cove Tutors, including our founder, tutors (who are engaged as self-employed contractors), any other contractors and any volunteers
- all lessons and contact with pupils, including live lessons on Google Meet, lesson notes, emails and any other communication about a pupil
- all children and young people under 18 that we teach or come into contact with, and any adult at risk we come into contact with in the course of our work.

Where we teach pupils on behalf of a school, AP setting or local authority, this policy works alongside that organisation's own safeguarding policy (see section 8).

3. Legal and statutory framework

This policy is written with regard to:

- Keeping children safe in education (the current edition)
- Working Together to Safeguard Children 2023
- the DfE's guidance for providers of out-of-school settings, including tuition providers
- the Children Act 1989 and the Children Act 2004
- the Safeguarding Vulnerable Groups Act 2006 (including the duty to refer to the Disclosure and Barring Service)
- the Female Genital Mutilation Act 2003 (including the mandatory reporting duty)
- the Counter-Terrorism and Security Act 2015 and the Prevent duty guidance
- the Domestic Abuse Act 2021
- the Care Act 2014 (for adults at risk)
- UK GDPR and the Data Protection Act 2018
- the Equality Act 2010 and the Human Rights Act 1998

- the procedures of the local safeguarding partnership in the area where each child lives, and the local authority designated officer (LADO) process.

Where a child lives in England, we follow the procedures of the local safeguarding partnership for that area. Where a child lives in Wales, we follow the Wales Safeguarding Procedures. Where a child lives elsewhere, we follow the procedures of the local area where the child lives.

We are not a specified authority under the Prevent duty, but we follow the Prevent duty guidance as good practice.

4. Roles and responsibilities

Designated Safeguarding Lead

Our Designated Safeguarding Lead (DSL) is Naomi, our founder. Naomi is a former headteacher, deputy headteacher and head of science. The DSL has lead responsibility for safeguarding and child protection at Cove Tutors. The DSL:

- receives and acts on all safeguarding concerns, disclosures and low-level concerns
- decides on next steps and makes referrals to children's social care, the police, the LADO and the Disclosure and Barring Service as needed
- liaises with the DSL or safeguarding lead of each commissioning school, setting or local authority
- keeps safeguarding records secure and up to date
- makes sure every tutor is trained, inducted and knows how to report a concern
- makes sure our safer recruitment checks are carried out and recorded
- reviews this policy at least once a year.

Deputy Designated Safeguarding Lead

We have a Deputy Designated Safeguarding Lead (Deputy DSL), trained to the same standard as the DSL. The Deputy DSL acts for the DSL when the DSL is unavailable, and receives any concern or allegation about the DSL. The name of the current Deputy DSL is given to every tutor at induction and to every commissioning organisation on request.

Contacting the safeguarding team

Email safeguarding@covetutors.co.uk. This address reaches both the DSL and the Deputy DSL. If you are reporting a concern about the DSL, follow section 10.

Tutors, contractors and volunteers

Everyone who works with our pupils must:

- read and follow this policy, our online safety and remote lessons policy, and the code of conduct at induction
 - complete safeguarding training before their first lesson and keep it up to date
 - report any concern about a child to the DSL the same day
 - report any concern about the conduct of another adult working with children, including a colleague, to the DSL
 - never promise a child that they will keep a secret.
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5. Recognising abuse and neglect

Abuse is a form of maltreatment. Somebody may abuse a child by inflicting harm or by failing to act to prevent harm. Abuse can happen in person or online, and it can be carried out by adults or by other children. Children may not realise they are being abused, may not feel ready to tell anyone, or may communicate it through their behaviour rather than words.

Tutors see children only on screen, so they will not see most physical signs. They are, however, well placed to notice changes in mood, behaviour, presentation, attendance and what children say. Tutors do not need to be sure that abuse is happening. They need to report what they notice.

Physical abuse

Hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or otherwise causing physical harm. Possible signs on screen include visible injuries, a child flinching or seeming frightened of an adult nearby, or explanations of injuries that do not make sense.

Emotional abuse

Persistent emotional maltreatment that harms a child's emotional development. It includes making a child feel worthless or unloved, humiliating them, threatening them, or exposing them to the ill treatment of another person. Possible signs include very low self-esteem, being overly anxious about making mistakes, fear of a parent or carer's reaction, or hearing a child shouted at or belittled off camera.

Sexual abuse

Forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening. It includes contact and non-contact activity, such as making a child look at or produce

sexual images, or grooming a child in preparation for abuse, including online. Possible signs include sexual knowledge or language inappropriate for the child's age, secretive online relationships, or unexplained gifts.

Neglect

The persistent failure to meet a child's basic physical or psychological needs. It includes failing to provide adequate food, clothing or shelter, failing to protect a child from harm, failing to supervise, or failing to secure medical care. Possible signs include a child who often seems hungry or tired, poor hygiene, being left alone for long periods, or not being able to join lessons because basic needs are not met.

6. Specific safeguarding issues

Child-on-child abuse

Children can abuse other children, in person or online. This includes bullying and cyberbullying, physical abuse, sexual violence and sexual harassment, abuse in intimate relationships, initiation or hazing, upskirting, and the consensual or non-consensual sharing of nude or semi-nude images. We never dismiss it as "banter" or "part of growing up". In group lessons, tutors challenge inappropriate language and behaviour straight away.

Online abuse and grooming

Children can be harmed online through contact with people who want to abuse or exploit them, exposure to harmful content, harmful conduct (such as sharing images), and commercial risks such as scams. Grooming is when someone builds a relationship with a child to abuse or exploit them. Warning signs include a child being secretive about who they talk to online, having an older "friend" they met online, or being upset after using their phone or computer.

If a tutor becomes aware of a nude or semi-nude image of a child, they must not view, copy, save, forward or delete it. They must report it to the DSL straight away.

Child sexual exploitation

Child sexual exploitation is a form of sexual abuse where a person or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, sometimes in exchange for something the child needs or wants. It can happen online. A child cannot consent to their own exploitation.

Child criminal exploitation and county lines

Child criminal exploitation is when a person or group coerces, manipulates or deceives a child into criminal activity. County lines is one form, where children are used to carry drugs or money between areas. Signs include going missing, unexplained money, new phones or clothes, new older friends, and a sudden drop in attendance or engagement.

Radicalisation and Prevent

Radicalisation is the process by which a person comes to support terrorism or extremist ideologies. Children can be drawn in online. Signs include expressing extremist views, using extremist language or symbols, or becoming withdrawn and secretive about new contacts. Any tutor concerned that a child may be at risk of radicalisation must tell the DSL the same day. The DSL will decide whether to make a Prevent referral through the local authority or the police.

Female genital mutilation (FGM)

FGM is illegal in the UK and is a form of child abuse. Tutors must report any concern that a child is at risk of FGM, or has undergone it, to the DSL straight away.

There is a mandatory reporting duty under the Female Genital Mutilation Act 2003. Where a teacher, in the course of their work, discovers that an act of FGM appears to have been carried out on a girl under 18 (because the girl tells them, or they see signs), they must personally report it to the police by calling 101. Any tutor who is subject to this duty must make that report themselves, and must also tell the DSL. Tutors who are not sure whether the duty applies to them must still tell the DSL straight away, and the DSL will make sure the police are informed.

Domestic abuse

Children who see, hear or experience the effects of domestic abuse are victims of domestic abuse in their own right. In online lessons, a tutor may hear arguments, threats or violence in the background. Tutors must report this to the DSL.

Mental health

Mental health problems can be a sign that a child has suffered, or is at risk of, abuse or neglect. Tutors are not expected to diagnose mental health conditions, but they must report concerns about a child's mental health or wellbeing to the DSL. If a child says they intend to harm themselves or end their life, or a tutor believes they are at immediate risk, the tutor must call 999 and then tell the DSL.

Children missing education

A child going missing from education, or being absent without explanation, can be a sign of abuse, neglect, exploitation or other risks. For commissioned programmes, we share attendance with schools

every week and with AP settings within 24 hours. Where a pupil misses lessons unexpectedly and we have a welfare concern, we tell the commissioning organisation the same day.

7. What a tutor must do

If a child tells you something (a disclosure)

1. **Listen.** Stay calm, give the child time and let them speak in their own words. Reassure them that they were right to tell you.
2. **Do not promise confidentiality.** Explain that you will need to tell someone whose job is to help keep them safe.
3. **Do not investigate.** Do not ask leading questions or press for details. If you need to clarify, use open questions such as "Is there anything else you want to tell me?"
4. **Record it.** As soon as possible, and in any case the same day, write down what the child said in their own words, what you saw or heard, the date and time, and what you said. Stick to facts. Sign and date your record.
5. **Report it to the DSL the same day** by emailing safeguarding@covetutors.co.uk. Do not wait until the end of the week or the next lesson.
6. **Keep it confidential.** Do not discuss the disclosure with anyone other than the DSL or Deputy DSL. Do not tell the parent or carer unless the DSL asks you to, because this could put the child at greater risk.

If you have a concern

You do not need a disclosure to act. If something you see or hear worries you, record it and report it to the DSL the same day, in the same way.

If a child is in immediate danger

Call 999 straight away. Give the police any information you have about where the child is. Then tell the DSL. If the child is still in the lesson and it is safe to do so, stay on the call with them until help arrives or a responsible adult takes over.

If you cannot reach the DSL or Deputy DSL

If the child may be at risk of significant harm and you cannot reach the DSL or Deputy DSL, contact the children's services team at the local authority where the child lives, or the police, yourself. Tell the DSL what you have done as soon as you can. Anyone can make a referral.

8. What the DSL does

When the DSL receives a concern, they will:

- review the information and decide what action is needed, seeking advice from children's social care where unsure
- make a referral to children's social care at the local authority where the child lives where a child is at risk of, or is suffering, significant harm, or may need early help or support
- contact the police where a crime may have been committed or a child is in immediate danger
- for commissioned pupils, inform the DSL of the commissioning school, AP setting or the local authority lead the same day
- decide, with advice from children's social care where needed, whether and when to speak to parents or carers
- record every decision and the reasons for it, including decisions not to refer
- follow up any referral to check what has happened, and escalate under local procedures if they believe a child remains at risk.

9. Working with schools, AP settings and local authorities

When a school, AP setting or local authority commissions us to teach its pupils:

- the commissioning organisation's safeguarding policy and DSL take precedence for its pupils
- we agree at the start of each programme who the named safeguarding contact is, how to reach them, and how concerns will be shared
- we follow the commissioning organisation's procedures, and share every concern with its DSL or lead through the agreed route on the same day
- our DSL still records the concern, and may also make a referral directly where a child is at risk and that is needed to protect them
- we report welfare concerns about AP pupils to the commissioner the same day
- we confirm to the commissioning organisation, on request and in writing, the checks carried out on the tutors working with its pupils.

When we work for a school or local authority, that organisation is the data controller for its pupils' information and we act as its processor. Safeguarding records about its pupils are shared with its DSL.

10. Allegations against tutors or Cove Tutors staff

This section applies when anyone reports that a tutor, contractor, volunteer or member of the Cove Tutors team may have:

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

How to report an allegation

Report it to the DSL straight away at safeguarding@covetutors.co.uk. If the allegation is about the DSL, report it to the Deputy DSL. If you are not able to do this, or you are not satisfied with the response, contact the LADO at the local authority where the child lives.

What we will do

- The DSL (or the Deputy DSL, if the allegation is about the DSL) will not investigate the allegation themselves. They will record it and refer it to the LADO within one working day.
- Where the child attends a commissioning school or setting, we will tell its DSL the same day, unless the LADO or police advise otherwise.
- We will follow the advice of the LADO, the police and children's social care.
- The person concerned will be suspended from all work with children while the allegation is dealt with. This is a neutral act and does not imply guilt.
- We will treat the person fairly, keep them informed as far as the LADO and police allow, and keep the matter confidential.
- If we stop using a person's services, or would have done so had they not left, because they have harmed a child or posed a risk of harm (the harm test is met), we will make a referral to the Disclosure and Barring Service, as the law requires. Where relevant, we will also consider a referral to the Teaching Regulation Agency.
- We will keep a clear record of the allegation, how it was handled and the outcome. Allegations found to be malicious will be removed from the person's file.

11. Low-level concerns

A low-level concern is any concern, however small, that an adult working with children may have acted in a way that does not fit our code of conduct, even if it does not meet the threshold for an allegation. Examples include being over-friendly with a pupil, having favourites, contacting a pupil outside our approved channels, or using inappropriate language.

All low-level concerns must be reported to the DSL. Tutors are encouraged to self-report if they find themselves in a situation that could be misinterpreted. The DSL records every low-level concern, reviews records to identify patterns, and takes action where needed. If a concern is found to meet the threshold for an allegation, section 10 applies.

12. Whistleblowing

Anyone who works with us can raise a concern about poor or unsafe practice, or a failure to act on safeguarding, without fear of reprisal. Raise it first with the DSL, or with the Deputy DSL if it is about the DSL.

If you do not feel able to raise it with us, or you feel your concern has not been dealt with, you can contact the NSPCC whistleblowing advice line on 0800 028 0285, or the local authority where the child lives.

13. Record keeping

- Safeguarding records are kept separately from lesson notes and progress records.
- Records are stored securely in our business Google Workspace account, with access limited to the DSL and Deputy DSL.
- Records are factual, dated and signed. They separate fact from opinion, and record a child's words exactly.
- Each record shows the concern, the action taken, the decisions made and the reasons for them, and the outcome.
- Records are kept for the periods set out in statutory guidance and then securely destroyed.
- When a child moves to another provider, or a commissioned programme ends, relevant safeguarding information is shared securely with the commissioning organisation's DSL.

14. Information sharing

We follow the information sharing principles in Working Together to Safeguard Children 2023 and the government's advice on information sharing for safeguarding practitioners. Information is shared only with those who need it, accurately, securely and in good time.

UK GDPR and the Data Protection Act 2018 do not prevent the sharing of information to keep children safe. Where there is a risk to a child, we share information without consent if seeking consent would place the child at greater risk, or if it is otherwise justified to protect them. We record what we shared, with whom and why.

15. Training

- The DSL and Deputy DSL complete formal DSL training, refreshed at least every two years, and update their knowledge at least once a year through briefings, reading and local safeguarding partnership updates.
- Every tutor completes safeguarding and child protection training before their first lesson. It is refreshed regularly, with safeguarding updates at least once a year.
- Every tutor completes Prevent awareness training before their first lesson.
- Every tutor reads this policy, our online safety and remote lessons policy, and Part one of Keeping children safe in education (the current edition) at induction, and confirms in writing that they have done so.

16. Safer recruitment

We check every tutor before they work with children. Checks include an enhanced DBS certificate with a check of the children's barred list, two references, identity and right to work checks, qualification checks, and an interview that includes safeguarding questions. We keep a single central record of the checks carried out. Full details are in our [safer recruitment statement](#).

17. Online safety

All lessons are live and online. Tutors use only our business Google Workspace accounts, and never contact pupils through personal accounts, phones, social media or messaging apps. All communication

goes to, or copies in, the parent or carer, or the school or setting lead for commissioned pupils. A responsible adult must be nearby during lessons for pupils under 18. Lessons are not recorded unless the commissioner and the parent or carer agree in writing in advance. Full details are in our [online safety and remote lessons policy](#).

18. Review

The DSL reviews this policy at least once a year, and sooner if the law or statutory guidance changes, or if a review of a safeguarding incident shows that it should be updated. Every tutor is told about any changes.

Cove Tutors is a trading name of Cornish Adventures Ltd, registered in England and Wales, company number 15788616.

Questions about this policy? Email hello@cove-tutors.co.uk

[All policies](#)