

Safeguarding Vulnerable Adults and Child Protection Policy (Online-Only Provision)

Business Name: Top SEN Tutor

Policy Type: Safeguarding Vulnerable Adults and Child Protection (Online Only)

Date of Issue: 01/01/2026

Review Date: 01/01/2027

1. Policy Statement

Top SEN Tutor is an online-only tuition service and is fully committed to safeguarding and promoting the welfare of children, young people, and vulnerable adults who access our services remotely. We recognise our responsibility to take all reasonable steps to protect learners from harm, abuse, neglect, and exploitation in an online environment.

Safeguarding is everyone's responsibility. This policy applies to all tutors, staff, contractors, and anyone working on behalf of Top SEN Tutor.

2. Scope of the Policy

This policy applies to:

- Children and young people under the age of 18
- Vulnerable adults (aged 18+) who may be at risk due to learning difficulties, disabilities, mental health needs, illness, or other circumstances
- All online activities delivered by Top SEN Tutor, including:
 - Online tuition sessions
 - Online assessments
 - Digital communications (email, messaging platforms, learning portals)
 - Video conferencing platforms

Top SEN Tutor does **not** provide in-person or home-based tuition.

3. Legal Framework

This policy is informed by the following UK legislation and statutory guidance:

- Children Act 1989 and 2004
- Care Act 2014

- Safeguarding Vulnerable Groups Act 2006
- Working Together to Safeguard Children (latest version)
- Keeping Children Safe in Education (principles applied proportionately)
- Equality Act 2010
- Data Protection Act 2018 and UK GDPR

4. Definitions

Safeguarding: The action taken to protect children, young people, and vulnerable adults from maltreatment, prevent impairment of health or development, and ensure safe and effective care, particularly in online settings.

Child Protection: Part of safeguarding that focuses on protecting children who are suffering or are likely to suffer significant harm.

Vulnerable Adult: A person aged 18 or over who may be unable to protect themselves from harm or exploitation due to personal circumstances.

5. Roles and Responsibilities

Designated Safeguarding Lead (DSL)

Top SEN Tutor will appoint a Designated Safeguarding Lead who is responsible for:

- Overseeing safeguarding practice for online provision
- Receiving and responding to safeguarding concerns
- Making referrals to statutory agencies where required
- Ensuring secure record keeping of safeguarding concerns
- Acting as the main point of contact for safeguarding queries

DSL Name: Sacha Hernandez-Downer

Contact Details: hello@topsentutor.com/ 07917 763 946

Tutors and Staff

All tutors and staff must:

- Read, understand, and comply with this policy
- Complete safeguarding and online safety training
- Maintain professional boundaries in all online interactions
- Use only approved communication platforms
- Report safeguarding concerns immediately to the DSL

6. Safer Recruitment and Vetting

Top SEN Tutor applies safer recruitment practices appropriate to online-only services, including:

- Enhanced DBS checks for all tutors and staff working with children or vulnerable adults
- Verification of identity, qualifications, and references
- Clear expectations regarding online conduct and safeguarding responsibilities
- Ongoing monitoring of suitability

7. Online Safeguarding Risks

Online safeguarding risks may include:

- Grooming or exploitation
- Exposure to inappropriate content
- Inappropriate online communication
- Cyberbullying
- Emotional abuse or coercion
- Breaches of privacy or confidentiality

Tutors must remain vigilant to changes in behaviour, emotional distress, withdrawal, or inappropriate online interactions.

8. Online Conduct and Professional Boundaries

Tutors and staff must:

- Communicate with learners only via approved platforms
- Use professional language and behaviour at all times
- Avoid private or personal social media contact with learners
- Not exchange personal contact details unnecessarily
- Ensure transparency by copying parents/carers into communications where appropriate

One-to-one online sessions must be conducted in a professional manner, with parental/carer awareness for children.

9. Use of Online Platforms and Recording

Top SEN Tutor will:

- Use secure, approved online platforms

- Ensure appropriate privacy and security settings are in place

Tutors must:

- Not record sessions unless explicit written consent has been obtained from the parent/carer or learner (where appropriate)
- Store any authorised recordings securely and delete them in line with data protection requirements

10. Responding to Safeguarding Concerns

If a learner discloses abuse or a safeguarding concern arises:

1. Listen carefully and take the concern seriously
2. Do not promise confidentiality
3. Reassure the learner they have done the right thing
4. Record the concern accurately, including dates and times
5. Report the concern immediately to the DSL

If there is an immediate risk of harm, emergency services must be contacted.

11. Reporting and Referral

The DSL will decide whether:

- The concern can be managed internally
- A referral should be made to Children's Social Care, Adult Social Care, or other relevant safeguarding bodies

Referrals will follow local safeguarding procedures and statutory guidance.

12. Confidentiality and Information Sharing

Safeguarding information will be:

- Shared only on a need-to-know basis
- Stored securely in accordance with GDPR
- Shared without consent where there is a risk of significant harm

13. Allegations Against Tutors or Staff

Any allegation that a tutor or staff member has:

- Harmed a learner
- Behaved inappropriately online
- Breached professional boundaries

Must be reported immediately to the DSL. Where required, the DSL will refer the matter to the Local Authority Designated Officer (LADO) or other relevant bodies.

14. Training and Awareness

Top SEN Tutor will ensure that:

- All tutors and staff receive safeguarding and online safety training at induction
- Refresher training is completed regularly
- Safeguarding updates are communicated promptly

15. Monitoring and Review

This policy will be:

- Reviewed annually or when legislation or guidance changes
- Updated to reflect best practice in online safeguarding
- Made available to tutors, staff, parents, and learners where appropriate

16. Online Code of Conduct for Tutors

This Online Code of Conduct sets out the expected standards of behaviour for all tutors working with Top SEN Tutor in an online-only environment. It must be read in conjunction with the Safeguarding Vulnerable Adults and Child Protection Policy.

16.1 Professional Behaviour

Tutors must:

- Act at all times in a professional, respectful, and inclusive manner
- Treat all learners with dignity, patience, and respect
- Maintain appropriate boundaries in all online interactions
- Follow all safeguarding, data protection, and confidentiality requirements

Tutors must not:

- Engage in any behaviour that could be interpreted as inappropriate, abusive, discriminatory, or exploitative
- Use offensive, sexualised, or overly familiar language

16.2 Communication Standards

Tutors must:

- Communicate with learners only via Top SEN Tutor–approved platforms and systems
- Keep communication focused on learning and support
- Ensure parents/carers are aware of sessions for learners under 18
- Use professional tone and language in all written and verbal communications

Tutors must not:

- Communicate with learners through personal email accounts, phone numbers, or social media
- Send messages outside reasonable hours unless agreed and appropriate

16.3 One-to-One Online Sessions

Tutors must:

- Conduct one-to-one sessions in a transparent and professional manner
- Ensure appropriate privacy settings are used
- Be aware of their surroundings, ensuring a neutral and appropriate background
- Dress appropriately for online teaching sessions

Tutors must not:

- Arrange unsupervised sessions with children without parental/carer knowledge
- Encourage secrecy or private arrangements with learners

16.4 Use of Video, Audio, and Recording

Tutors must:

- Use video and audio appropriately and professionally
- Seek explicit written consent before recording any session
- Store authorised recordings securely and delete them in line with data protection requirements

Tutors must not:

- Record sessions without consent
- Share recordings, screenshots, or learner information without authorisation

16.5 Safeguarding Responsibilities

Tutors must:

- Remain vigilant to safeguarding concerns and online risks
- Report any safeguarding concerns immediately to the Designated Safeguarding Lead (DSL)
- Record concerns factually and promptly
- Cooperate fully with safeguarding investigations

Tutors must not:

- Investigate safeguarding concerns themselves
- Promise confidentiality to learners

16.6 Use of Social Media and Online Presence

Tutors must:

- Maintain a professional online presence
- Ensure personal social media accounts do not compromise professional boundaries

Tutors must not:

- Add, follow, or interact with learners on social media
- Share personal opinions, images, or content that could undermine professional credibility

16.7 Breaches of the Code of Conduct

Any breach of this Online Code of Conduct may result in:

- Additional training or supervision
- Suspension of tutoring duties
- Termination of contract
- Referral to external agencies where appropriate

All breaches must be reported to the DSL or management.

17. Policy Approval

This policy, including the Online Code of Conduct for Tutors, has been approved by Top SEN Tutor management and is effective from the date stated above.

Signed:

Name: Sacha Hernandez-Downer

Role: Lead Tutor/ DSL

Date: 1/1/2026

