Online Safety Policy

Version	3.0
Date Policy Reviewed	September 2026
Policy Reviewed by	Head of Education Quality Assurance
Date of Next Review	September 2027

1. Policy Statement

TP Tutors (TPT) is committed to providing the highest standard of safeguarding for online tuition or mentoring. Online is defined as when the educator teaches the learner remotely using software approved by the client and TPT.

The use of technology exposes different challenges and risks for children, young people, TPT staff and educators which include abuse. It is essential that children are safeguarded from potentially harmful and inappropriate material or behaviours online. TPT has a company-wide approach to online safety which empowers, protects and educates our learners, staff and educators in their use of technology, and establishes mechanisms to identify, intervene in and escalate any concerns where identified.

We will ensure online safety is reflected as required in all relevant policies. When devising and implementing our policies and procedures and planning staff training, incorporating the role and responsibilities of the DSL within online safety is considered as a running and interrelated theme.

TPT recognises that technology, and the risks and harms related to it, evolve and change rapidly. We will carry out an annual review of our approaches to online safety, supported by an annual risk assessment which considers and reflects the risks faced by our educators and learners.

The DSL has overall responsibility for online safeguarding within TPT and will respond to online safety concerns in line with the Safeguarding and Child Protection Policy. Where necessary, concerns will be escalated and reported to relevant partner agencies in line with our policies and procedures. Internal sanctions and support will be implemented as appropriate.

2. Purpose

This policy aims to:

- Define the principles by which TPT manages online safety for educators and learners.
- Establish safeguarding protocols for online tuition and mentoring.
- Establish arrangements for reporting and escalating online safety concerns.

- Ensure online tuition and mentoring provision is safe, appropriate and meets individual learner needs.
- Support compliance with relevant safeguarding, equality and educational requirements.

3. Scope

This policy applies to:

- All learners referred to TPT for online tuition or mentoring provision.
- All TPT staff involved in monitoring online placements and quality assurance processes.
- All educators delivering online provision on behalf of TPT.
- Local Authorities, schools, parent/carers, academies and partner organisations commissioning online services from TPT.

4. Definitions

Term	Definition
TPT	TP Tutors
QA	Quality Assurance
DSL	Designated Safeguarding Lead
Educator	Tutor or mentor engaged in delivering provision on behalf of TPT
Commissioner	Local Authority, school, academy or organisation commissioning provision
Learner	Child or young person referred to TPT for educational support
TC	Tuition Consultant

5. Roles and Responsibilities

TPT' range of technology includes computers, mobile phones, laptops, tablets and other digital devices, the internet, our learning platform and email systems.

TPT takes responsibility for:

- Ensuring that educators, learners and parents/carers can use the TPT online digital classroom and their own devices safely within UK law and educational safeguarding standards.
- Ensuring all TPT-owned devices and systems will be used in accordance with our acceptable use policies and with appropriate safety and security measures in place.
- Safeguarding all learners whilst delivering tuition or mentoring online and in accessing resources online which supplement tuition.
- Protecting the educator as well as the learner.
- Enabling the educator to apply all aspects of TPT' Safeguarding Policy and Procedure when providing online tuition.

- Ensuring that educators only use the online tuition software and platform as authorised by TPT, in order to protect learners and themselves.
- Ensuring that educators providing in-person tuition whilst using a laptop or other device, use the device in a safe and responsible way.
- Recognising the specific risks that can be posed by mobile technology, including mobile phones.

5.1 Safeguarding Team (DSL/DDSL)

TPT recognises the specific risks that can be posed by mobile and smart technology, including mobile/smart phones, cameras and wearable technology. In accordance with KCSIE 2026, TPT has appropriate mobile and smart technology and image use policies in place which are shared and understood by all staff, educators and parent/carers and other agencies or members of the wider community.

TPT is aware of its responsibility to use digital technology to keep children safe online, prevent cyber incidents and upgrade and maintain technology in order to meet cyber security standards. We are aware that abuse online can take place wholly online or technology may be used to facilitate offline abuse.

The DSL has overall responsibility for online safety and online safeguarding within TPT. The DSL's online responsibility cannot be delegated but can be supported by appropriately trained deputies and they may liaise with other staff on matters of online safety.

The Safeguarding Team will:

- Have overall responsibility for online safety (KCSIE Annex C) and understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability in support of keeping children safe whilst online.
- Recognise and offer support regarding the additional risks learners with SEND face online and have the relevant knowledge and up to date capability required to keep children safe online.
- Ensure online safety is integral to induction and safeguarding training.
- Ensure staff and educators understand the role technology plays in Child Sexual Exploitation (CSE), Child Criminal Exploitation (CCE), child-on-child sexual violence and sexual harassment.

5.2 QA Team

The QA team monitors attendance, engagement and behaviour in online sessions and works with educators to ensure they are adapting their delivery to engage a learner and encourage regular attendance and positive behaviour. Educators are provided with support and guidance and directed to further training where required. The QA team carries out observations of online sessions for safeguarding and quality assurance purposes.

5.3 Educators

Educators must report any concerns to the Safeguarding Team through MyConcern/MyCommunity, by using the My Concern link or QR code where applicable.

Educators must adhere to the following guidance when delivering online at home or online at a school:

- **Online at home** - Ensure that they speak to a parent/carer or responsible adult at the start of the online lesson if the learner is under 18 or a vulnerable adult. This will let them know that their child now has unsupervised online access.
- **Online at school** - Do not start a session until an adult is visible in the classroom. This will support any disruption or illness that cannot be managed remotely. Educators will:
    - Familiarise themselves with the school's Safeguarding Policy so that they understand the school's reporting protocols.
    - Ensure that if they are providing group online tuition for children on school premises, the session will not proceed unless an adult is visible in the classroom.
    - Report any incident in the first instance to the school's DSL and then to the TPT DSL.

For all online provision, educators must adhere to the following guidance:

- Seek guidance from the TPT DSL at any point if unsure how to proceed.
- Only use the online tuition software and platform authorised by TPT and clients.
- **Do Not** use another platform without permission.
- Dress appropriately for online sessions and ensure that the learner is appropriately dressed.
- **Do Not** make contact or respond to learners directly through email, text messages or social media or any other means except through the TPT online tuition platform.
- Inform parent/carers of what sites the learner has been asked to access and what they will be asked to do online.
- Seek permission from the parent/carer if the learner is required to download material to supplement learning.
- Immediately report to TPT Safeguarding any illegal, inappropriate or harmful material as soon as you are aware of it.
- Direct learners to use only age-appropriate online resources and tools.
- Recognise that learners with SEND face additional risks online and will require on-going support and guidance.
- Be aware of the role technology plays in terms of content relating to Child Sexual Exploitation and Child Criminal Exploitation and that child-on-child sexual violence and harassment can occur off and online.

- **Do Not** take or publish images of the learner or family members. If images are required as part of the learning, permission must be sought from TPT prior to asking the learner. Parent/carer or appropriate adult must be present when images are taken.
- Support and encourage learners to learn about and manage online risks.
- Customise the background of their own computer so that a learner does not see anything inappropriate during a lesson or ensure your background is neutral and remove any personal items such as photographs in order to maintain a professional relationship.
- Remove anything inappropriate, confidential or distracting.
- **Do Not** have online lessons in your bedroom or where a bed can be seen in the background.
- Be mindful of what a learner might see on your computer and only open things that are needed for the session.
- Ensure that your camera and microphone are turned off if you step away from the computer during a lesson.
- **Report any** inappropriate behaviour, illegal activity or inappropriate material in line with TPT Safeguarding Policies and Procedures.
- **Report any** safeguarding or Child Protection concerns in accordance with TPT Safeguarding Policies and Procedures.

5.3.1 Youth-produced sexual imagery – or 'sexting'

This is defined as the sending or posting of nude or semi-nude images, videos or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. Alternative terms used by children and young people may include 'dick pics' or 'pics'.

If an incident occurs, educators must report it to Safeguarding immediately and are provided with the following guidance:

- **Never** view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – **this is illegal**.
- If you have already viewed the imagery by accident (e.g. if a young person has shown it to you before you could ask them not to), report this to the DSL and seek support.
- **Do not** delete the imagery or ask the young person to delete it.
- **Do not** ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL.
- **Do not** share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents/carers.
- **Do not** say or do anything to blame or shame any young people involved.

- **Do** explain to them that you need to report it and reassure them that they will receive support and help from the DSL (UKCIS 2020.)

5.4 The Learner

The learner will:

- Not start using the service unless their school or a parent/carer over the age of 18 has formally registered them.
- Not communicate with the educator other than through the online tuition platform.
- Wear suitable clothing.

5.5 Parent/Carers

Parent/carers will:

- Let the educator know that they are present at the start of the online session.
- Be responsible for the welfare of the learner throughout the session and ensure suitable clothing is worn, including anyone in the household.
- Ensure that any computers or other devices used are in an appropriate communal area and not in a bedroom.
- Be present in the home throughout the online session to supervise the learner and be available to the educator if required.

5.6 Schools and Commissioners

Schools and commissioners are responsible for:

- Ensuring educators are provided with details of the school's Safeguarding Policy and relevant contacts.
- Ensuring that when group online tuition is being provided remotely, an adult from the school will be in the room throughout the session. This will support any disruption or illness that cannot be managed by the educator teaching remotely.

6. Policy Requirements

TPT delivers online tuition according to the following principles:

Inclusion

We do not discriminate on the basis of gender, race, ethnicity, disability, religion, sexual orientation, behavioural history, prior attainment or learning need.

Access for All

All learners referred through appropriate commissioning routes are eligible for consideration for tuition or mentoring support.

Needs-Based Matching

Learners are matched with educators and mentors whose qualifications, skills, experience and training align with identified learner needs.

Safeguarding and Welfare

Admissions and placement decisions prioritise learner safety, wellbeing and best interests at all times.

Quality Assurance

All placements are subject to quality assurance processes to ensure consistency, differentiation, effectiveness and measurable learner progress.

7. Procedures

7.1 Categories of Online Risk

TPT staff and educators are aware of the **four Cs of online risk**:

Content: being exposed to extreme sexual or physical violence, simulated harmful online AI interactions, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.

Contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

Conduct: making, sending or receiving self-generated intimate images using AI. Behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and nonconsensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying).

Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your learners or staff are at risk, please report it to the Anti-Phishing Working Group (https://apwg.org/).

TPT recognises the importance of providing age and stage appropriate guidance around understanding online harms such as sharing images, the prevalence of deepfakes, pornography and misogynistic influencers and when and where to seek help.
We are also aware of the dangers of misinformation, disinformation (including fake news) and conspiracy theories that pose a risk to children and vulnerable adults.

The growth of different electronic media in everyday life and an ever-developing variety of devices including PCs, laptops, tablets, mobile and smart phones, webcams etc., place an additional risk on children and vulnerable adults.

Internet chat rooms, discussion forums or social networks can all be used as a means of contacting children and vulnerable adults with a view to grooming them for inappropriate or abusive relationships. The anonymity of the internet allows adults, often pretending to be children, to have conversations with children and in some cases arrange to meet them.

TPT recognises that access to abusive images is not a 'victimless' act as it has already involved the abuse of children. The internet has become a significant tool in the distribution of indecent photographs of children and educators must be aware and report any concerns immediately.

Learners can engage in or be a target of bullying using a range of methods including text and instant messaging to reach their target. Mobile phones are also used to capture violent assaults of other children for circulation. The best protection is to make pupils aware of the dangers through reference to the Child Exploitation and On-line Protection Centre where appropriate http://www.ceop.gov.uk/.

7.2 Generative AI

TPT recognises the impact of generative AI, one branch of artificial intelligence focused on creating new, original content such as text, images, audio, video, or code, by learning patterns from datasets and generating outputs that resemble human-created work.

This creates both opportunities and challenges for the education sector and as an education provider TP Tutors is mindful of both.

Challenges include content produced by generative AI that could be:

- Inaccurate
- Inappropriate or unsafe
- Biased
- Taken out of context
- Taken without permission (intellectual property infringement)
- Out of date or unreliable
- Low quality.

ChatGPT, Microsoft Copilot and Google Gemini are generative AI tools, built on large language models (LLMs), a category of foundation models trained on large amounts of data, enabling them to understand and generate human-like content. Tools such as ChatGPT, Microsoft Copilot and Google Gemini can:

- Answer questions
- Complete written tasks
- Generate images, text or code

- Respond to prompts in a human-like way.

Other forms of generative AI can produce:

- Audio
- Simulations
- Videos.

If generative AI is used by educators in sessions, they must take great care to ensure they are abiding by their legal responsibilities, including those related to:

- Data protection
- Keeping Children Safe in Education
- Intellectual Property Law

Educators will consider the possible impact on learning, the importance of the educator-learner relationship and the risks of bias and misinformation. Educators will discuss the opportunities and challenges of AI with learners.

TPT educators will take the following approach:

- Make the most of the opportunities that technology provides
- Use technology safely and effectively to deliver high quality education that prepares learners to contribute to society and the future workplace
- Be aware of the limitations and risks of this technology
- Technology, including generative AI, should not replace the valuable relationship between teachers and pupils.

Educators will seek support from the DSL or deputy as required and refer to the policy guidance provided.

Further guidance on online safety can also be found in Annex D of KCSIE 2026.

7.3 Online Tuition Requirements

TPT will ensure that any remote sharing of information, communication and use of online learning tools and systems will be in line with privacy and data protection requirements.

- Staff/educators will ensure all communication with learners and parents/carers will take place using communication channels either provided or approved by TPT.
- In the event that compliance is not possible, this should be discussed with the DSL.
- Staff and learners will engage with remote teaching and learning in line with the TPT Code of Conduct & Acceptable Use as outlined in the Safeguarding & Online policies.

- TPT will do all we possibly can to limit children's exposure to online risks through our IT systems and will ensure that appropriate filtering and monitoring systems are in place. Filtering and monitoring will be reviewed at least annually.
- Learner access to our online learning platform is set up and agreed with the parent/carer. The contact information is held securely and provides a recorded communication channel for learner and educator.
- Online sessions are recorded and stored securely. Individual sessions can be viewed by the DSL/DDSLs for safeguarding purposes and by the QA team to monitor the quality of provision.
- All users will be informed that use of our systems can be monitored, and that monitoring will be in line with data protection, human rights and privacy legislation.

7.4 Filtering and Monitoring

- Filtering breaches or concerns identified through our monitoring approaches will be recorded and reported to the DSL and/or technical staff, as appropriate.
- Any access to material believed to be illegal will be reported immediately to the appropriate agencies and the police.
- When implementing appropriate filtering and monitoring, TPT will ensure that "over blocking" does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding.
- TPT acknowledges that whilst filtering and monitoring is an important part of our online safety responsibilities, it is only one part of our approach to online safety:
    - Learners' internet use will be supervised by educators according to learner age and ability.
    - Learners will be directed to use age-appropriate online resources and tools by educators.
- TPT will support and encourage all learners to learn about and manage online risks.
- Online safety training will be incorporated into all safeguarding training for all staff and educators and is integrated, aligned and considered as part of our overarching safeguarding approach.
- Educators and learners will be encouraged to report issues experienced at home and concerns will be responded to in line with our Safeguarding policies where applicable.
- Parents/carers will be made aware of what their children are being asked to do online, including the sites they will be asked to access.
- We will ensure parent/carers know who their child is going to be interacting with online.

- Parents/carers will be encouraged to ensure children are appropriately supervised online and that appropriate parental controls are implemented at home.

7.5 TPT Online Tuition Platform

The safety and wellbeing of learners and educators is of the highest importance. Educators must not use other software or platforms that are not authorised for online tuition by TPT. All educators are recruited in line with safer recruitment and vetting processes prior to being allowed to register for online tuition.

Safeguarding features on the online platform:

- All information is held privately and securely within the platform, including email address and telephone number in line with GDPR.
- Timings and duration of lessons are logged.
- Written communication between the educator and learner on the platform is accessible by TPT for the purposes of safeguarding and quality assurance.
- Sessions are recorded for the purposes of safeguarding and quality assurance.
- When registering a child on the online tuition platform, educators and parent/carers give their consent electronically when accepting the Terms and Conditions to have sessions securely recorded. If consent has not been given, then educator and learner cannot use the platform.

7.6 Acceptable Use

Educators will:

- Use their own devices to access online learning resources to supplement tuition unless working at a school which supplies their own devices to educators.
- Encrypt or password protect all devices brought to tuition sessions.
- Not access any devices belonging to the learner. If the learner is required to use their device to download learning resources to supplement lessons, educators must seek permission from the parent/carer first.
- Immediately report to TPT DSL any illegal, inappropriate or harmful material or incident that occurs as soon as aware.
- Not take or publish images of the learner or family members with or without their permission. If images are required as part of the learning, permission must be sought from TP Tutors prior to asking the learner. Parent/carer or appropriate adult must be present when images are taken.
- Not save any personal contact information regarding any learner on their personal devices e.g. laptop. Assessments and learning plans will be password protected or anonymised.

- Report any concerns that a young person receiving tuition or mentoring online might be subject to abuse or any concerns of a child protection nature whether online or not to the Safeguarding Team.
- Seek advice from the Safeguarding Team over concerns related to the security of devices.

7.7 Reporting Online Safety Concerns

If educators discover unsuitable sites or material, they must:

- Immediately advise the learner to log off.
- Log off themselves.
- Contact the parent/carer.
- Report the concern to the DSL.
- Not log back in until advised by the DSL.

8. Training and Communication

TPT will ensure that:

- Online safety training is incorporated into safeguarding training for staff and educators.
- Online safety is integrated into induction and safeguarding arrangements.
- Parent/carers are made aware of online learning arrangements and expectations.
- TPT staff and educators report concerns and seek support from the QA team.

9. Monitoring and Compliance

Compliance with this policy will be monitored through:

- Filtering and monitoring systems.
- Safeguarding oversight by the DSL.
- Quality assurance monitoring of online provision.
- Review of safeguarding incidents and concerns.
- Annual review of online safety arrangements and risk assessments.

10. Non-Compliance

Failure to comply with this policy may result in:

- Investigation by relevant managers.
- Additional training, supervision or support for staff and educators.
- Corrective actions to address identified concerns.
- Escalation through safeguarding or organisational procedures where appropriate.

TPT will seek to address non-compliance proportionately while maintaining learner safety, service quality and regulatory compliance.

11. Version Control

Version	Date	Author	Summary of Changes	Approved By	Next Review Date
3.0	September 2026	Head of Education Quality Assurance	New format applied.	Managing Director	September 2027