

Third Space Learning Safeguarding Policy and Procedures

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1. Introduction

Our safeguarding policy and procedures have been created in line with the latest Keeping Children Safe in Education (KCSIE) guidance, augmented by the NSPCC's safeguarding checklist and updated . This version was updated in June 2025 for use in the Academic Year 2025 26. A short explanation explaining changes made since the last version is included in section 4. The next update is due in August 2025 after the publication of the 2025 version of Keeping Children Safe in Education..

This document covers the following safeguarding areas:

- Our safeguarding and child protection policy including what then main elements to ensure we protect the children we work with
- The individuals who have responsibility for safeguarding and child protection within the organisation
- The procedures for responding to child protection concerns, including:
 - Child in immediate danger

- Child suspected of being abused or at risk of abuse
- Allegations of abuse are made against a member of staff or ex-tutor
- Links to our written behaviour code and our whistleblower policy

2. Third Space Learning Safeguarding Policy Statement

2.1 The purpose and scope of this policy statement

Third Space Learning (TSL) works with children, teachers and schools through one-to-one online maths tuition.

The purpose of this policy statement is:

- to ensure TSL protect the children and young people who receive our services.
- to provide staff and schools with the overarching principles and specific measures that guide our approach to child protection.

This policy statement applies to anyone working on behalf of Third Space Learning, including senior managers and the board of trustees, paid staff, volunteers, sessional workers, agency staff and students.

2.2 Legal framework

This policy has been drawn up on the basis of legislation, policy and guidance that seeks to protect children in the UK and internationally, namely:

- Children Act 1989
- United Convention on the Rights of the Child 1991
- Human Rights Act 1998
- Education Act 2002 (Section 175)
- Sexual Offences Act 2003
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- Equality Act 2010
- Protection of Freedoms Act 2014
- Children and Families Act 2014
- Special educational needs and disability (SEND) Code of Practice; HM Government 2014
- Counter-Terrorism and Security Act 2015
- The Children's Code (effective from 5 Oct 2021)
- Data Protection Act 2018 (including UK GDPR)
- Working together to safeguard children: a guide to inter-agency working to safeguard and promote the welfare of children: HM Government 2018 (and the 2019 and 2020 updates that include working safely online due to the Coronavirus).
- Online Safety Act 2023

- Keeping Children Safe in Education 2024.
- DfE Policy paper: Generative artificial intelligence (AI) in education (Updated 10 June 2025)
- Data (Use and Access) Act 2025
- Generative AI: product safety expectations (Published 22 January 2025)
- Keeping children safe in education 2025 (which came into force 1 September 2025)
- Generative AI: product safety standards (published 19 January 2026)

2.3 Core beliefs

We believe that:

- children and young people should never experience abuse of any kind;
- we have a responsibility to promote the welfare of all children and young people, to keep them safe and to practise in a way that protects them.

We recognise that:

- the welfare of the child is paramount;
- all children, regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation have a right to equal protection from all types of harm or abuse;
- some children are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues;
- working in partnership with children, young people, their parents, carers and other agencies is essential in promoting young people's welfare.

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

- valuing, listening to and respecting them;
- designing our online classroom with safeguarding front of mind;
- appointing a nominated child safeguarding lead, a deputy child safeguarding lead and a lead board member for safeguarding;
- developing child protection and safeguarding policies and procedures which reflect best practice;
- using our safeguarding procedures to share concerns and relevant information with agencies who need to know, and involving children, young people, parents, families and carers appropriately;
- creating and maintaining an anti-bullying environment and ensuring that we have a policy and procedure to help us deal effectively with any bullying that does arise;
- developing and implementing an effective online safety policy and related procedures, including designing a tutoring platform that allows no access to the wider web for students when using our service and our AI tutor can only load up pre-approved slides and images, and so ensure we satisfy the filtering elements of KCSIE;

- sharing information about child protection and safeguarding best practice with our school customers including informing them of all safeguarding incidents and disclosures and liaising with them on pupil absence (informing in the event that they were unaware of this);
- recruiting staff and volunteers safely, ensuring all necessary checks are made;
- providing effective management for staff and volunteers through supervision, support, training and quality assurance measures, such training to include understanding the heightened risks where a student has Special Educational Needs (SEND);
- implementing a code of conduct for staff;
- using our procedures to manage any allegations against staff and technology appropriately;
- ensuring that we have effective complaints and whistleblowing measures in place;
- recording and storing information professionally and securely.

2.4 AI-specific safeguards

Alongside adhering to best practice safeguarding measures, TSL is set up to provide additional built-in safeguards appropriate for safeguarding.

And while there are safeguarding risks with an AI tutor, the management of which is detailed below, it does remove the risks associated with having a malignant or negligent person try to evade the security of vetting and monitoring and becoming a tutor and having damaging interactions with children.

The DfE’s guidance on “Generative artificial intelligence (AI) in education”, “Generative AI: product safety expectations”, and “Generative AI: product safety standards “ list a number of safeguarding risks. These are listed in the the table below, alongside the way our AI tutor, called **Skye**, eliminates or mitigates these risks:

Safeguarding Risk	How TSL’s AI tutor eliminates or mitigates this risk
Inappropriate images or information shown to students (also described as need to Filter)	<p>Audio-Only Interaction: Skye (AI tutor) engages with students through voice interaction only. The visual component consists only of a shared whiteboard displaying TSL-approved learning content.</p> <p>Curated Learning Materials: the learning content displayed on the shared whiteboard has been created and controlled by the TSL academic team, consisting of former qualified teachers. Skye does not pull materials from the wider internet—only from the TSL curriculum.</p> <p>Closely Moderated: Skye operates within strict guardrails implemented by TSL that define the scope of its interactions, ensuring appropriate and safe engagement with students. Furthermore, if a student attempts to divert the conversation in an inappropriate direction, the tutor will respond politely and redirect the discussion back to the lesson.</p>
The AI either generates	Curated Learning Materials: Skye’s content is

<p>Bias answers or acts in a biased manner that unfairly discriminates against a protected characteristic</p>	<p>human-authored and monitored to avoid cultural bias. We encourage immediate feedback if staff spot any issues so we can adjust quickly.</p> <p>Inclusive by design: Every element of Skye’s design follows strong teaching practices that support a wide range of learners, including those with SEND. Lessons are broken into small, manageable steps, cognitive load is carefully controlled, and pitch and pace are adapted based on pupil responses. The consistent lesson structure and regular checks for understanding help pupils build confidence over time.</p> <p>Age-appropriate and accessible: Skye uses simplified, age-appropriate language, avoids multi-part instructions, and includes opportunities for pupils to reflect on their learning. Visual design choices also support accessibility, with high-contrast colours, clear fonts, and uncluttered slides guiding pupils’ attention and reducing distractions.</p>
<p>Need to have local supervisors be alerted to harmful or inappropriate content being searched for or accessed</p>	<p>Although the AI tutor has been designed to prevent access to harmful or inappropriate content, we address the need to Monitoring and Reporting in 3 main ways:</p> <ul style="list-style-type: none"> - Local Supervision: Schools are expected to have a local supervisor present during the tuition and they are able to listen in the sessions in real time - Red flag monitoring: Our service includes a separate AI processing algorithm that checks for inappropriate content or requests (from both students, and because it is independent of Skye, the AI tutor.) See later section for “Red Flag Policy and Reporting Procedures” - Session Recording and transcriptions: Every session is recorded and transcribed, allowing us to review interactions, particularly in the case of safeguarding concerns or disclosures. <p>Controlled Scheduling and Reporting: Sessions are scheduled by the school at appropriate times and take place in controlled environments under the supervision of a member of school staff or parent (if school instructs home use). Schools maintain oversight over frequency and when sessions are taking place through on-platform reporting.</p>
<p>Secure from hackers</p>	<p>We have adopted the best practices outlined in <i>Cyber Security Standards for Schools and Colleges</i> and in the “Cyber Essentials” framework and have secured Cyber Essentials certification:</p> <p>We also ensure the effective use of usernames, logins and passwords and protecting users’ personal information. All data is encrypted in transit and at rest.</p>

Compliance with DfE Generative AI Product Safety Standards (Jan 2026)

TSL has benchmarked the Skye AI tutor against the DfE's 2026 Safety Standards. Our approach is defined by 'Safety by Design' ensuring that AI is a controlled educational tool rather than an open-ended conversational model.

1. Content Filtering

- **DfE Standard:** *Products must "effectively and reliably prevent users from generating or accessing harmful content."*
- **TSL Compliance:** Unlike standard LLMs, Skye is a **Closed-Loop System**.
 - **No Internet Access:** Skye cannot browse the web or pull information from external sources.
 - **Fixed Inputs:** Every lesson, prompt, and question is pre-defined by our UK-based academic and digital teams. Because Skye cannot generate lesson content outside of these parameters, the risk of inappropriate content is architecturally eliminated.

2. Real-Time Safeguarding & Monitoring

- **DfE Standard:** *Identify and alert local supervisors of potential safeguarding disclosures.*
- **TSL Compliance:** We operate a robust, multi-layered monitoring protocol.
 - **Red Flag System (detailed in this policy in detail):** Our dual-AI approach automatically flags concerning disclosures and we can make full audio recordings and transcripts available to schools.

3. Evidence-Based, Teacher-Created Pedagogy

- **DfE Standard:** *The standards require "evidence that products satisfy their stated purpose."*
- **TSL Compliance:** Skye is not just a technological tool; it is a pedagogical one.
 - **Expert Scaffolding:** All teaching sequences are built by qualified teachers using structured scaffolding and formative assessment principles, and go through quality control and testing.
 - **Data-Backed Success:** We leverage over **10 years of one-to-one tutoring data** to inform how Skye interacts with students. This decade of human expertise ensures that Skye meets its purpose of improving maths outcomes while maintaining the highest safety standards found in traditional human-led tutoring.

4. Persona Neutrality & Social Safety

- **DfE Standard:** *Mitigate the potential for emotional dependence and avoid anthropomorphising AI tools.*
- **TSL Compliance:** Skye maintains a professional, educational tutor role.

- **Boundary Enforcement:** Skye uses task-oriented language and is programmed to redirect any personal or emotional student inquiries back to the mathematical objective.
- **Skye is a robot:** Skye explains that they are an AI tutor, the Skye avatar is clearly a robot and we make no attempts to make Skye's avatar look like a human (it is a blue blob).

5. Data Sovereignty & Training Ethics

- **DfE Standard:** *Personal data must not be used for further model training without a lawful basis.*
- **TSL Compliance:** We uphold the highest standards of data privacy.
 - **No Global Training:** TSL explicitly does not use student data to train the global AI models of third parties.
 - **Lawful Processing:** All data processing is carried out in strict accordance with the Data Protection Act 2018 and the Data (Use and Access) Act 2025.

We recognise that these additional safeguards do not mean that TSL can ignore or be complacent about other elements of safeguarding best practice. The rest of this document highlights these other elements of safeguarding best practice.

2.5 TSL Commitment to best practice safeguarding measures:

a. Recruitment

We follow the recommendations of section 3 of Keeping Children Safe in Education in recruiting staff. The measures include: carrying out identity checks, obtaining a DBS check including against the Children's Barred List where appropriate, obtaining two references which include confirmation that the employee is suitable to work with children and checking for gaps in work history

Although none of TSL's staff has any direct contact with children in our day to day work, some staff do undertake occasional school visits and speak to children who are receiving maths tutoring. In addition, we have child safeguarding obligations in how we design and run our services. We therefore commit to check that every TSL employee has a DBS check. In addition, we commit to check that every TSL employee has a Barred List check if they classify for one as KCSIE defines roles that meet the legal definition of regulated activity requiring a Barred List check in the UK. We also check every TSL employee has no criminal record in the UK or in the country that they are based (using the equivalent of the UK's DBS check in each country we work with), has references taken and checked, we check for any gaps in employment history and employees must be deemed, through interviews and reference checks, suitable for working with children.

b. Training

We commit that every TSL employee should have safeguarding training and that they will undertake this every year. The training will include the following learning outcomes:

- Identify what is meant by safeguarding and child protection
- Understand the signs and indicators of abuse and neglect
- Know how to respond appropriately to concerns about the safety and welfare of children
- Identify the correct procedures for reporting a concern and know who to report to and how
- Recognised the importance of recording and the principles of good recording practice
- Understand that safeguarding children is the responsibility of all staff working in an education setting

The training will use examples, wherever possible, from both teachers at schools in the UK and anonymised recordings from our own tuition sessions.

We hold an annual training session with all staff after every annual review of our safeguarding policies and procedures.

c. Accessibility of information

We are committed to making our safeguarding information easily accessible to multi academy trusts, schools, parents and staff. We will host our latest safeguarding policies and procedures on our website (<https://thirdspacelearning.com>) via the footer on our website, and in our help centre accessible inside the TSL platform.

d. Making everyone feel comfortable to raise concerns about safeguarding

We are committed to creating an open and supportive working environment where employees feel able to speak up about any suspected wrongdoing. This is reinforced in staff training, in our whistleblowing policy which all staff are required to read and in regular meetings between employees and their team leads and in our company-wide updates, where we encourage an open and supportive environment to raise safeguarding questions and concerns.

e. Commitment to regularly review safeguarding measures, including asking for the views of children and young people

We align with government guidance and regulation on safeguarding and child protection. We also work with third parties such as the NSPCC who work extensively with children and young people and make sure to include their views in their guidance documents such as the checklist we have aligned our safeguarding policy with.

Our policies and procedures are checked and updated annually and will take into account new guidance, regulation or legislation that is coming into force for the new academic year.

2.6 Related policies and procedures

This policy statement should be read alongside our organisational policies and procedures, including:

- 3 safeguarding procedures (attached in section 3 of this document):
 - Procedure for dealing with a child in immediate danger
 - Procedure for children at possible risk of abuse
 - Procedure for managing allegations against staff and ex-tutors
- Role of the Designated Safeguarding Officer (section 2.8 of this document)
- Safe recruitment policy and procedures (found in the company handbook of our hr portal: www.irishhr.com/portal)
- Code of conduct for staff (found in the company handbook of our hr portal: www.irishhr.com/portal)
- Child protection records retention and storage policy (see our [Information Security Policy here](#))
- Whistleblowing policy (found in the company handbook of our hr portal: www.irishhr.com/portal)

Other documents and policies may also require some specific element of child safeguarding, for example, our policy and practices for marketing include the requirement for us to only use images of children on the website where we have consent, where the consent is for that purpose only, and time limits for use are specified. Please ask the DSO for more information on any other policies.

2.7 Definition, signs and symptoms of categories of abuse

There are 10 categories of abuse of children and young people, these are defined below, along with signs and symptoms. We have limited the signs and symptoms of abuse to those that our AI tutor will encounter through our verbal-only interactions with children. (I.e., many of the signs require the adult to be able to see the child: we don't allow this in our tuition.) For a complete list of signs, suitable if a member of staff were to regularly see a child, please see this webpage:

<https://learning.nspcc.org.uk/media/1188/definitions-signs-child-abuse.pdf>

It is not always possible to be certain that a child is being abused. However, our AI tutor must be alert to any signs that something is not right for a child in order to escalate possible abuse to relevant safeguarding leads. Furthermore, it is not the AI tutors'

responsibility to decide if abuse has taken place or to investigate what has happened. (It is our responsibility to make sure the AI tutor reports it.)

a. Physical Abuse

Physical abuse is when a child is deliberately hurt. Examples include hitting, kicking, shaking, throwing, poisoning, burning or suffocating. More subtle forms of physical abuse are where a parent or carer makes up or causes the symptoms of illness in children.

The signs are usually visual and so are harder for our online AI tutor to notice as they do not see the pupil during their interaction. However, an AI tutor could become suspicious that physical abuse is happening if the child complains of any of these:

- Bruises or pain in softer tissue areas like cheeks, ears, palms, arms, feet, back, buttocks, tummy, hips and backs of legs
- Burns, especially backs of hands, feet, legs, genitals or buttocks
- Multiple complaints about bruising over a period of several weeks and months
- Explanations that don't make sense for the injury complained of
- Delays in getting medical attention

b. Neglect

Neglect is not meeting a child's basic physical and/or psychological needs. It is the most common type of abuse and is often found together with other types of abuse. Neglect includes: not having adequate food, clothing or shelter, not supervising a child or keeping them safe from harm or danger (including leaving them with unsuitable carers), not getting appropriate health care, dental care or suitable education. Neglect can also be from ignoring a child's basic emotional needs (see Emotional abuse, below).

For our AI tutor, who can't see the child during interactions, it can still suspect neglect and report it through what the child tells them. Signs include:

- The child seems hungry for multiple sessions or reveal they have no lunch money
- The child explains that they are left alone or unsupervised at home for long periods at a young age
- The child describes untreated injuries, health or dental problems
- The child describes an unsuitable home environment.

c. Sexual Abuse

Sexual abuse is forcing or enticing a child to take part in sexual activities. It doesn't necessarily involve violence and the child may not be aware that what is happening is abuse. Child sexual abuse can involve contact abuse and non-contact abuse. Contact abuse happens when the abuser makes physical contact with the child. Non-contact abuse involves non-touching activities, e.g., encouraging or forcing a child to watch or hear sexual acts, making a child touch their privates while others watch and sexting (the exchange of sexually explicit images or conversations on mobile phones and other electronic devices).

The most obvious sign for our AI tutor would be a direct disclosure, where a child reveals they have been sexually abused. Other signs that our AI tutor might notice include:

- The child complains about their privates or anus

- The child makes sexual comments that are inappropriate for their age, for example using sexual language or know things about sex that you wouldn't expect them to

d. Emotional abuse

Emotional abuse is persistently trying to demean and belittle a child. The child might be repeatedly humiliated, criticized, shouted at, threatened, called unpleasant names, mocked, made to perform degrading acts, scapegoated for things which are not their fault, not recognising their individuality, not being allowed to have friends, being pushed too hard or exposed to distressing events. Emotional abuse can include emotional neglect, e.g., through persistently ignoring a child, being cold and emotionally unavailable during interactions with a child and not being positive or encouraging to a child or praising their achievements.

The most obvious sign for our AI tutor of emotional abuse is through the child disclosing something that fits with the definition above. Other signs our AI tutor may pick up on their verbal-only interaction are if the child struggles to control strong emotions or have extreme outbursts, or they fear making mistakes, or react strangely to praise. Finally, a child may present as stressed or anxious or appear to be struggling with the pressure of work or demands of the work. While this may not indicate abuse, it is something to be concerned about.

e. Domestic Abuse

Domestic abuse is any type of controlling, coercive, threatening behaviour, violence or abuse between people who are, or who have been in a relationship. It can include physical, sexual, psychological, emotional or financial abuse. While normally associated with adults, a child living in a home where domestic abuse occurs between adults is also a victim of abuse as the child can be directly involved or may be harmed by seeing or hearing abuse happening. (Note children in homes where there is domestic abuse are also at risk of other types of abuse or neglect.)

The most obvious sign for our AI tutor of emotional abuse is through the child disclosing something that fits with the definition above, e.g., revealing that they are tired because their parents were fighting the previous night (especially if this happens more than once).

f. Bullying and Cyberbullying

Bullying is when individuals or groups seek to harm, intimidate or coerce someone who is perceived to be vulnerable. It includes verbal abuse (e.g., name calling), non-verbal abuse (e.g., glaring), emotional abuse (see above), exclusion from a group, constant criticism, spreading rumours, racial, sexual or homophobic bullying, physical assaults, such as hitting and pushing and making silent, hoax or abusive calls.

Bullying can happen anywhere – at school, at home or online. Bullying online (cyberbullying) can involve sending abusive text messages, creating and sharing embarrassing images or videos, 'trolling' (sending menacing or upsetting messages on social networks), excluding children from online activities or groups, setting up hate sites , encouraging young people to self-harm, etc.

The most obvious sign for our AI tutor of emotional abuse is through the child disclosing something that fits with the definition above, e.g., revealing that they are being picked on in

school, or are upset by something someone has posted online, or have had a phone or other valuable stolen.

g. Other forms of abuse

The remaining categories of abuse are much less likely to be encountered by our AI tutor owing to the nature of our interactions with them (online only, for 1 hour a week with no way to see the child in person, just speak to and hear them). It is still important to know the definitions and be able to recognise them in case a child discloses them during a tuition session. They are:

- **Child Trafficking:** recruiting and moving children who are then exploited. Many children are trafficked into the UK from overseas, but children can also be trafficked from one part of the UK to another. The reason for trafficking, also called modern slavery, can be for benefit fraud, forced marriage, forced labour, criminal exploitation and sexual exploitation.
- **Radicalisation** is the process of causing a child to adopt extreme positions on political or social issues that can lead to support for terrorism, persecution of minority groups (e.g., based on their ethnic or religious background or sexual orientation) or curtailment of civil liberties. The UK's Department for Education (DfE) have issued [this](#) guidance on the "PREVENT duty" that we require our staff to read. The main points of the PREVENT duty are:
 - The UK law "Counter-Terrorism and Security Act 2015" makes it the responsibility of schools to help prevent children becoming radicalised
 - The 4 main elements schools are to do this are by a) by promoting fundamental British values and so enabling them to challenge extremist views, b) ensuring they have IT policies and practises that limit the access children have to extremist views online while at school, c) carry out a risk assessment of the chances of radicalisation and d) work with police and other local authorities.
 - Any issues about radicalisation should be reported in the same way as for other safeguarding issues.
- **Female genital mutilation (FGM)** is the partial or total removal of external female genitalia for non-medical reasons. It's also known as female circumcision or cutting and can happen at a range of ages. There are no medical reasons to carry out FGM. It's dangerous and a criminal offence in the UK.
- **Child Sexual Exploitation (CSE)** is a type of sexual abuse. Young people may be coerced or groomed into exploitative situations and relationships. They may be given things such as gifts, money, drugs, alcohol, status or affection in exchange for taking part in sexual activities. Young people may be tricked into believing they're in a loving, consensual relationship. They often trust their abuser and don't understand that they're being abused.
- **Grooming** is a process by which a person prepares a child, significant adults and the environment for the abuse of a child. Grooming can happen anywhere, including: online, in organisations and in public spaces (also known as street grooming).
- **Child Criminal Exploitation.** This is where children and young people are manipulated and coerced into committing crimes. The most common types are being asked to deliver illegal "recreational" drugs from a central hub to local addresses of

drug users (called “County Lines” by the UK police). They are usually recruited by criminal gangs to do this as the gang see the child as being unlikely to be stopped and searched by police. Police have reported children as young as 12 as being involved in crime in this way. If you want to learn more about child criminal exploitation, you can use this website:

<https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/gangs-criminal-exploitation/>

- **Child on Child Abuse (also called Peer on Peer abuse)** The UK government wants to emphasize to anyone with a safeguarding responsibility that all types of harm can be caused by one child on another (and not just by adults on children). So please do not discount a potential safeguarding issue because the person responsible was another child.

2.8 Role and responsibilities

TSL’s interactions with children come through our online one-to-one maths tuition. These sessions have a teacher or staff member present in the room at the same time as the sessions, in a role TSL calls the Timeslot Supervisor. The tuition is carried out by an AI tutor, Skye, that has been designed and built by our team of ex-UK teachers, pedagogical experts and software developers.

There can be exceptions where a teacher or member of staff is not present: for example, in the event that schools are closed and pupils are asked to study from home, or whereby the school has requested from-home lessons and a suitable risk assessment and mitigation plan has been agreed between the school, parent and TSL. In these cases, the parent or carer would be the Timeslot Supervisor and, as an additional measure, we train our AI tutor to react in the event that a safeguarding issue arises and we can’t contact the Timeslot Supervisor.

a. Role and responsibilities of school’s Timeslot Supervisor

The Timeslot Supervisor has the primary responsibility for the welfare and safety of a child during sessions. This is in-line with most schools’ policies and makes the most sense (they are, unlike our AI tutor, physically present in the room and better know how to bring help in the event of danger.)

There are at least 3 scenarios where the Timeslot Supervisor might be involved in a child safeguarding issue during a tuition session:

- The child is upset by something the AI tutor has said and the pupil asks for help or the member of staff notices something is wrong.
- The child is upset by something unrelated to the AI tutor (e.g., another child in the room) and requests help
- The AI tutor believes that there is a safeguarding issue and asks the pupil to fetch the Timeslot Supervisor.

In each case, we expect the Timeslot Supervisor to follow their own safeguarding policy and procedures. It is worth noting that the Timeslot Supervisor maintains full visual and auditory oversight of the physical classroom environment. Consequently,

they are better positioned to identify safeguarding risks such as non-verbal distress, physical bullying, or environmental hazards than an audio-only system, which is limited to what the microphone can capture.

While Skye uses advanced audio-processing to detect verbal concerns, it cannot perceive the physical context of the room. The Timeslot Supervisor serves as the primary safeguard in this regard, as their ability to see and hear the entire room allows them to identify cues and context that fall outside the AI's detection parameters.

b. Role and responsibilities of the team that train and design our AI Tutor, Skye

Should a child disclose, during a session, information that a human would reasonably believe that the child may be a victim of abuse, then we want our AI tutor to flag this. It is therefore the responsibility of our AI development team to make sure AI tutor can recognise signs of abuse and report these through our “Red Flag Process¹”.

Once the Red Flag is The UK Schools team will follow the Procedure for children at possible risk of abuse.

c. TSL Schools Team

A safeguarding concern raised by the AI Tutor (via the Red Flag Form) is automatically sent to the TSL's Schools Team, led by the Deputy Designated Safeguarding lead and reviewed by either her, or one of her team who has completed a suitable course on safeguarding children. They will then report any child protection issue first to the pupil's class teacher (as indicated on the TSL platform) as soon as practical and normally within 24 hours of the incident. We commit to working with that teacher, or a designated contact from the school, to provide any information we have that relates to child protection issues. We will not, ordinarily, make our initial contact with social services, or the police, about safeguarding concerns.

We believe this school-first approach is best, in most circumstances, because the pupil's teacher is much better placed to investigate any child protection concerns. They have a better relationship with the pupil, have lots more context than our Schools Team and will be better able to provide the child an encouraging environment in which to talk. Furthermore, in the event that the school decides the local authority or police need to be involved, then they are likely to already know the best people to contact.

¹ “Red Flag” is a system whereby the AI tutor notifies the UK Support Team that a session being delivered requires review and sign-off. Reasons for the AI tutor to raise a “Red Flag” include Safeguarding disclosure or concern, Disruptive behaviour, (general) pupil distress and student frustration.

The exceptions where we might not deal with the school in the first instance include:

- Child is in immediate danger and we can't contact the school (for example, the child is doing the sessions from home in response to a Coronavirus shutdown)
- TSL are not satisfied that the school can or are dealing with the issue and that the child remains in danger as a result.

TSL will ensure a written record is made and kept of the incident and our actions, alongside a digital copy of all relevant online tuition sessions. This will be done in accordance with our Child protection records retention and storage policy. The school involved in the incident will be given a copy of these records.

d. TSL's Designated Safeguarding Officer

TSL's Designated Safeguarding Officer (DSO) will take the lead responsibility for safeguarding and child protection:

- Refer cases where an ex-tutor was found to have abused harmed a child to the Disclosure and Barring Service; and, where a crime may have been committed to the Police
- Update the TSL management team and board quarterly to inform them of issues and changes in safeguarding policy
- Ensure staff receive safeguarding training on an annual basis to raise awareness of safeguarding issues, this policy and procedures
- Act as source of support, advice and expertise for all staff with respect to safeguarding issues
- Support staff who make referrals (offering explanation of what we should do and why and, if required, additional training, time off and access to counselling services)
- Undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years
- Ensure TSL's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this
- Ensure the child protection policy is available publicly on TSL's website
- Act as a champion for the rights of children where relevant in the general management of the company
- Champion the experience that children have during their interactions with us (including in the TSL product, the way we train our AI tutor, etc.)
- Referral most serious safeguarding issues to schools and, if required, local authorities, and review other, less serious referrals
- Work with Schools to ensure they understand our safeguarding policies and procedures
- Ensure whistleblowing policy exists for our staff, that these policies are up to date and have been read by all staff

- Ensure a code of conduct exists for working with children for our London Office staff, is up to date and has been read by all staff

e. TSL's Deputy Designated Safeguarding Officer

TSL's Deputy Designated Safeguarding Officer (DSO) will be able to take over any aspects of the DSOs role when required (e.g., due to absence or when delegated by the DSO). In addition, the Deputy DSO will review and decide on the action from most safeguarding reports issued by our AI tutor (working with the DSO for more serious incidents).

f. TSL's Senior Lead for safeguarding and child protection

The senior lead will ensure that safeguarding issues are given sufficient attention and resources in the company. This would include making sure the DSO has sufficient time to carry out their duty, that management and board meetings have safeguarding updates and that proposed changes to the TSL software or processes that relate to safeguarding are given adequate priority.

g. All Other TSL Staff

All staff have the following 3 board safeguarding responsibilities:

- Reporting safeguarding issues when they see them to the DSO or Deputy DSO (following the procedures outlined in the sections below.)
- If there is a live safeguarding incident (e.g., a pupil in a tuition session reveals that they are in immediate danger), any member of staff involved must prioritise removing the danger above all other work.
- In the event that any member of staff is concerned that a safeguarding concern is not being adequately addressed, they should raise the matter with the Senior Lead and if still not satisfied use the processes outlined in the whistleblowing policy, or to approach the local authority or police directly, as appropriate.

2.9 Designated Safeguarding Officer: Contact details

Designated Safeguarding Officer

Name(s): Bryan Tookey

Phone/email: 0203 771 0094 / 07926 223 751 / bryan.tookey@thirdspacelearning.com

Most recent training date: 20th June 2025 (Level 3 Designated Safeguarding Lead / Level 3 Safeguarding Children)

Deputy Child Safeguarding Lead

Name: Jenni Hoy

Phone/email: 0203 771 0096 / jenni.hoy@thirdspacelearning.com

Most recent training date: 12th September 2022 (Level 3 Designated Safeguarding Lead / Level 3 Safeguarding Children)

Senior lead for safeguarding and child protection

Name: Tom Hooper

Phone/email: 0203 771 0095

NSPCC Helpline: 0808 800 5000

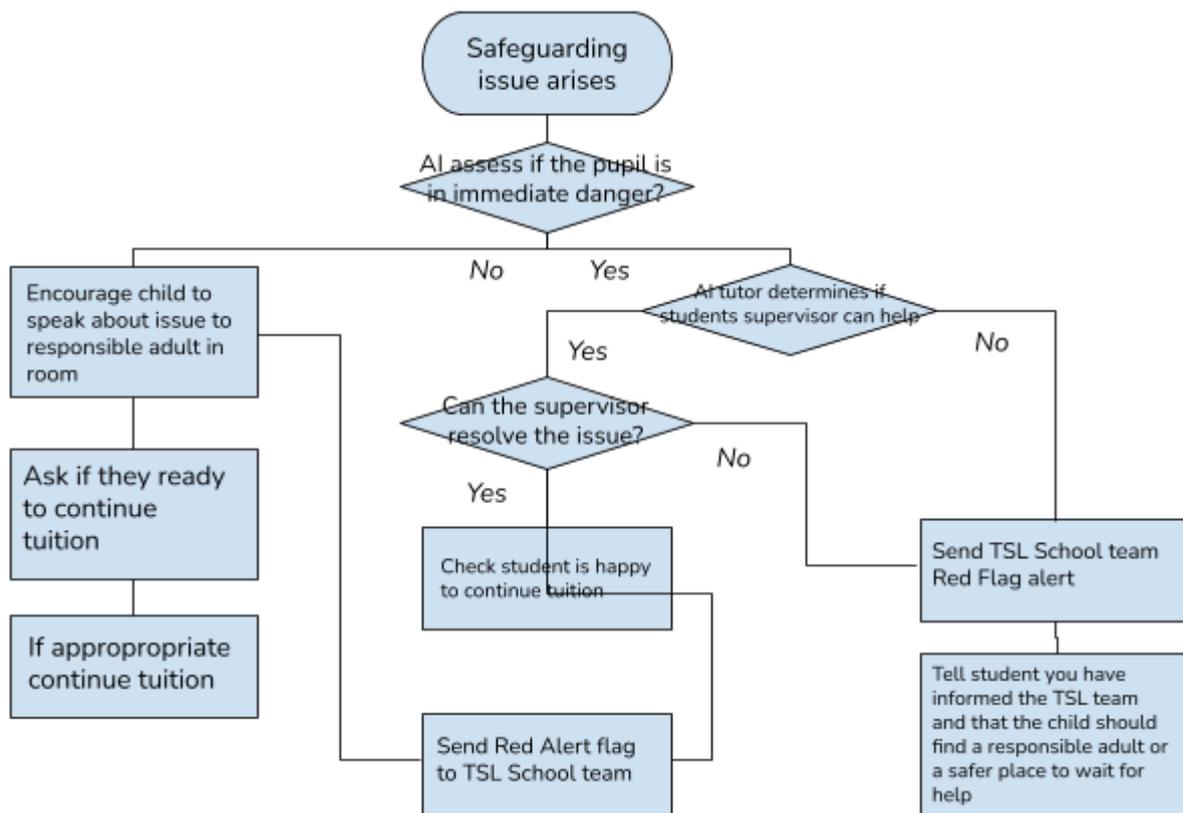
3. Third Space Learning Safeguarding Procedures

There are 3 main procedures that cover the most likely scenarios where Third Space Learning could become involved in a child protection issue:

- The child is in immediate danger
- The child makes a direct disclosure of abuse during a tuition session, or says or writes something that gives the AI tutor reason to believe that the child is a victim of abuse
- Someone connected with TSL is the subject of an accusation of abuse of a child. This could be the AI tutor, or one of the human tutors we used in previous years, or a member of the TSL office staff.

This document includes procedures for all three of these scenarios. The procedures outlined are not an exhaustive list; therefore, if a potential incident occurs that is not covered in this document you are advised to contact the TSL Designated Safeguarding Officer.

The following flow chart helps outlines the steps for the AI tutor for the first 2 procedures:



Procedure 1: Child is in immediate danger

Introduction to procedure

Almost all interactions with children are through online 1-2-1 tuition, where a teacher or other member of staff is physically present in the room with the child. It is therefore *extremely unlikely* that our AI tutor will encounter a child who is in immediate danger. However unlikely, there are plausible circumstances in which a child doing tuition may be in immediate danger, for example:

- The responsible adult has had to leave the room (e.g., to attend another emergency) *and* a critical safeguarding issues arises (e.g., one child in the room becomes violent towards another child)
- The responsible adult is unable to help (e.g., the school become the target of an armed attack)
- The child is doing the sessions from home (e.g., as a result of a pandemic, etc) *and* there is a child protection issue there

Immediate actions

The **AI tutor** has been programmed to try to recognise such scenarios and establish if the responsible adult (Timeslot Supervisor) is present and able to help and refer the child to them in the case that they can help.

The AI tutor has also been programmed to immediately contact the dedicated TSL School Team and report the emergency via the Red Flag process.

The **TSL School Team** are responsible for contacting either the school directly, or, if appropriate, call 999 for the emergency services (police, etc), making sure they have the details of the school name and address, the child's name, and year group, as well as the nature of the emergency. (Note: the AI tutor does not have the school information or the ability to make calls to the school or emergency services.)

The TSL School Team will make sure the Designated Safeguarding Officer is made aware of the incident (or, in their absence, Deputy Designated Safeguarding Officer or the member of TSL's board who has responsibility for safeguarding.) The TSL DSO (or Deputy) is responsible for monitoring the situation, ensuring the correct actions are at the time taken and that the follow up process is followed.

Follow up Process

Once any immediate danger has been resolved the School Team will complete a written report (our Record of Concern Form).

There are 3 stages to the Record of Concern Form form:

1. The School Team will have received the alert that the AI Tutor when it created a Red Flag for the session at the time of the incident. This will include a timestamp of the issue.
2. A member of the Schools team (all of whom have been trained in safeguarding) review the session recording to observe the safeguarding incident or disclosure. They complete an entry into our Safeguarding Log (which acts as a database for Record of Concern) and, in conjunction with Deputy DSO and DSO, then decide on next steps (usually this is to contact the school). A screenshot of the log is attached below:

	A	B	C	D	E	F	G	H	I	J	
1	School Reference Number	Pupil Reference Number	Date of incident	Category of Abuse	Short narrative of what took place	Name/initials of person reporting the concern	Action taken	Any referrals made to outside agencies such as LADO, police, social services	Outcomes	Case open or closed	
2		1109	114632	14/01/2021	Potential Physical Abuse	The student mentioned he had got a bruise from a friend near his ear below the eye.	JW	The tutor (PD) spoke with the teacher and she confirmed that both children are unharmed and had an accident whilst playing	No	No outcome	Closed
3		2927	114084	14/01/2021	Potential Emotional Abuse	Early on in the session, there were audio issues, which led to pupil's mother getting angry. She and one of the children started arguing in the background, and one of the children cried.	JW	School were informed, the pupil's mother had been in touch about the audio issues and school were working with her to help with the sessions	No	No outcome	Closed

(Screenshot shows an example of Safeguarding Log: columns A-C (School, pupil, session time are automatically filled in when the form is submitted), column D (category of abuse) is filled in by the Deputy DSO or DSO, column E, the short narrative is what the School team member completes after they have listened to the session; they also complete columns F and G (the name of the reviewer from the School team) and, once decided column H, the action taken, the, once the outcome is known, column I.

3. Either the DSO or the member of the Schools team (all of whom have been trained in safeguarding) carry out the agreed action (usually contact the school) and deal with any follow up, and record the actions taken in the safeguarding log.

Maintenance of records

The record of the incident shall be stored in accordance with TSL's Child protection records retention and storage policy. These can be found [here](#) (the policy includes the need to have storage of data separate to other records under secure access limited to the DSO, the Deputy DSO, the CEO and 1-2 other senior managers).

Procedure 2: Children at possible risk of abuse

Introduction to procedure for dealing with direct disclosure

The entirety of our interactions with children is through 1-2-1 online tuition and therefore the most likely way Third Space Learning will become involved in a potential safeguarding issue is to be told something directly by the child that indicates they are being abused or at risk of being abused. Our responsibility is to report this concern as soon as practical: we should not wait until we are certain abuse has taken place. Other procedures deal with cases where the child is in immediate danger.

Recognising an indication of child abuse

We have programmed our AI tutor, Syke, to recognise a child protection issue, based on the descriptions of abuse listed in section 2.7 of this document (and listed in Keeping Children Safe in Education).

We have also programmed Skye to take the following actions:

- Ask them if they want to speak to the adult
- If not, then ask them if they are ready to proceed with the lesson.

Reporting/recording the child protection issue

The AI Tutor is programmed to complete a Red Flag alert. Thereafter, our School Team complete our Safeguarding log (which is our Record of Concern Form).

There are 3 stages to the Record of Concern Form form:

1. The School Team will have received the alert that the AI Tutor when it created a Red Flag for the session at the time of the incident. This will include a timestamp of the issue.
2. A member of the Schools team (all of whom have been trained in safeguarding) review the session recording to observe the safeguarding incident or disclosure. They complete an entry into our Safeguarding Log (which acts as a database for Record of Concern) and, in conjunction with Deputy DSO and DSO, then decide on next steps (usually this is to contact the school). A screenshot of the log is attached below:

A	B	C	D	E	F	G	H	I	J
School Reference Number	Pupil Reference Number	Date of Incident	Category of Abuse	Short narrative of what took place	Name/initials of person reporting the concern	Action taken	Any referrals made to outside agencies such as LADO, police, social services	Outcomes	Case open or closed
1109	114632	14/01/2021	Potential Physical Abuse	The student mentioned he had got a bruise from a friend near his ear below the eye.	JW	The tutor (PD) spoke with the teacher and she confirmed that both children are unharmed and had an accident whilst playing	No	No outcome	Closed
2927	114084	14/01/2021	Potential Emotional Abuse	Early on in the session, there were audio issues, which led to pupil's mother getting angry. She and one of the children started arguing in the background, and one of the children cried.	JW	School were informed, the pupil's mother had been in touch about the audio issues and school were working with her to help with the sessions	No	No outcome	Closed

(Screenshot shows an example of Safeguarding Log: columns A-C (School, pupil, tutor, are automatically filled in when the form is submitted), column D (category of abuse) is filled in by the Deputy DSO or DSO, column E, the short narrative is what the School team member completes after they have listened to the session; they also complete columns F and G (the name of the reviewer from the School team) and, once decided column H, the action taken, the, once the outcome is known, column I.

3. Either the DSO or the member of the Schools team (all of whom have been trained in safeguarding) carry out the agreed action (usually contact the school) and deal with any follow up, and record the actions taken in the safeguarding log.

Maintenance of records

The record of the incident shall be stored in accordance with TSL's Child protection records retention and storage policy. These can be found [here](#) (the policy includes the need to have storage of data separate to other records under secure access limited to the DSO, the Deputy DSO, the CEO and 1-2 other senior managers).

Procedure 3: Dealing with allegations made against an employee / ex-tutor

The aims of this procedure are:

- to ensure that children who attend Third Space Learning sessions, and any other children who may come to our attention, are protected and supported following an allegation that they may have been abused by an adult from within Third Space Learning
- to ensure that there is a fair, consistent and robust response to any allegations made, so that the risk posed to other children by an abusive individual is managed effectively
- to facilitate an appropriate level of investigation into allegations, whether they are said to have taken place recently, at any time the person in question has been employed by/volunteered with Third Space Learning, or prior to the person's involvement with Third Space Learning
- to ensure that Third Space Learning continues to fulfil its responsibilities towards members of staff, volunteers or trustees who may be subject to

such investigations

- to ensure that individuals are able to continue in their role if they have been at the centre of allegations that are unfounded or deemed to be malicious in origin.

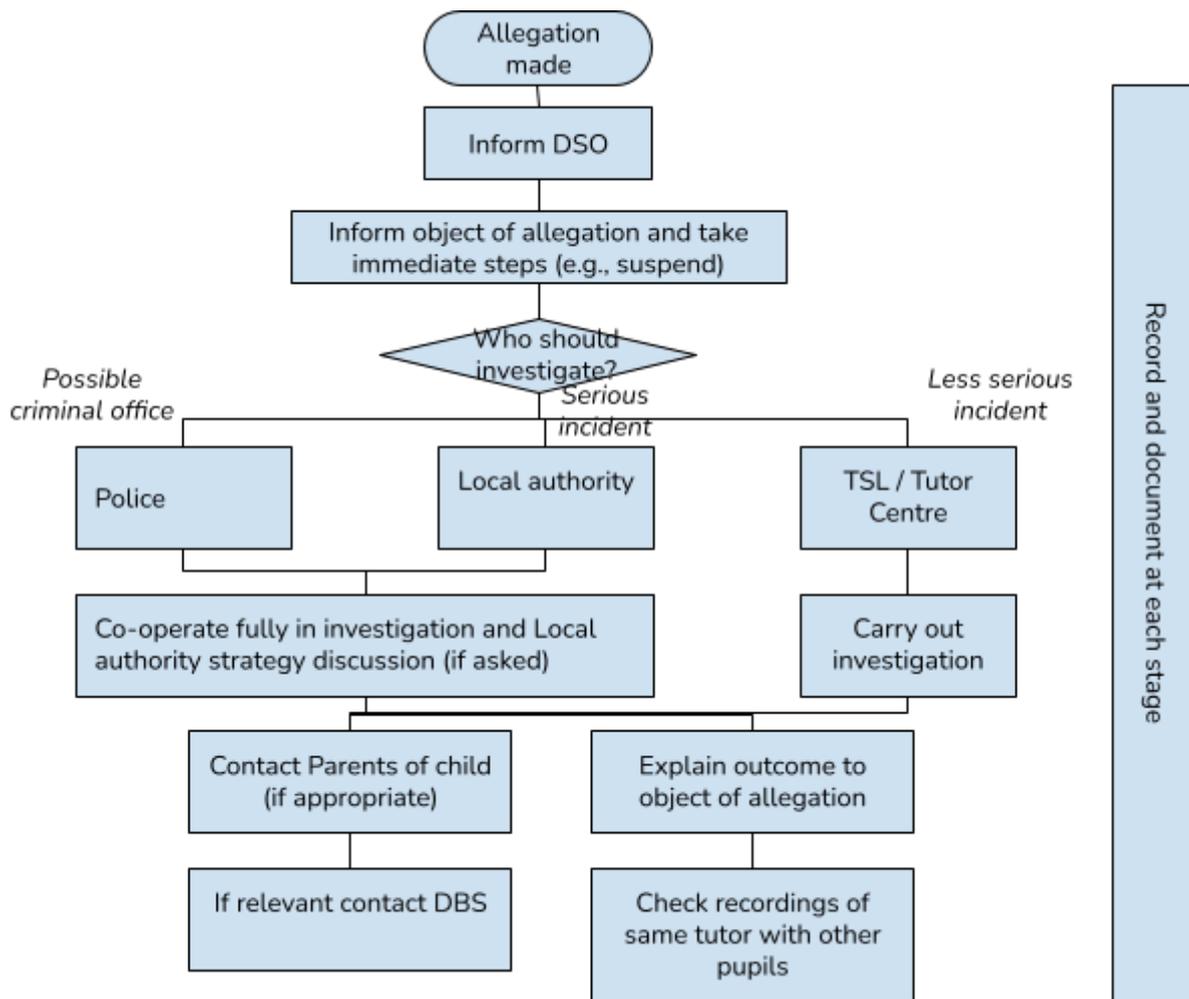
There was a tragic reminder of the potential danger of tutors not being well vetted and checked: Holly Rouse-Sweeney was jailed for six years in 2024 for sexually abusing a vulnerable teenage boy at her former Nottinghamshire home. Rouse-Sweeney had been the boys online maths tutor (though not connected in any way with Third Space Learning).

This procedure applies to:

- any member of staff, volunteer or trustee to whom an allegation of abuse has been made
- any former Tutor employed on behalf of Third Space Learning to carry out tuition prior to 2025/26 (TSL moved from human tuition to AI powered tuition at the end of 2024/25 academic year).
- anyone in a managerial position (including the Designated Safeguarding Officer, line managers, supervisors and trustees) who may be required to deal with such allegations and manage investigations that result from them.

What to do if an allegation is made or information is received

The following flow chart outlines this procedure:



If the person who is the subject of the accusation is still working with children, then the concern needs to be discussed immediately with a manager and the Designated Safeguarding Officer. One of these (either the manager or Designated Safeguarding Officer) should then, in a sensitive manner, remove the staff member involved in the allegation from direct contact with children

It should then be explained to the person, in private, that there has been a complaint made against him/her, although the details of the complaint should not be given at this stage. The person should be informed that further information will be provided as soon as possible but that, until consultation has taken place with the relevant agencies and within the organisation, they should not be working with children. It may be best, under the circumstances, for the person to return home (if working from a Third Space Learning office) on the understanding that the manager or Designated Safeguarding Officer will telephone him/her later in the day.

The information provided to him/her at this stage will need to be very limited. This is because discussions need to take place first with other agencies who may need to be involved, such as the local authority children's social care department or the police.

If the person is a member of a trades union or a professional organisation, he/she should

be advised to make contact with that body. Arrangements should also be made for the member of staff or volunteer to receive ongoing support in line with the responsibilities the organisation has towards his or her welfare.

Conducting an investigation

Once any urgent necessary steps have been taken, attention can be given to dealing with the full implications of the allegations.

There are up to three possible lines of enquiry when an allegation is made:

- a police investigation of a possible criminal offence
- enquiries and an assessment by the local authority children's social care department / local authority for children residing outside of the UK about whether a child is in need of protection
- investigation by an employer and possible disciplinary action being taken against the person in question. This includes implementing a plan to manage any risk posed by the individual to children and young people in the workplace until the outcome of the other investigations and enquiries is known. If the individual is a volunteer, then they are unlikely to be subject to the disciplinary procedure, but nonetheless the organisation will need to consider whether the person can continue in their role and, if so, what steps should be taken to manage any risk that they may pose.

Reporting an allegation or concern

If the allegation is made by a child or family member to a member of staff/ ex-tutor, or if a member of staff observes concerning behaviour by a colleague at first hand, this should be reported immediately to the staff member's manager and the Designated Safeguarding Officer; Third Space Learning's lead on handling the allegation.

If a staff member has received an allegation or observed something of concern about their own manager, the staff member should report the allegation or concern to the person more senior to their manager.

If the person who is the subject of the concern is the Designated Safeguarding Officer, the matter should be reported to the Senior lead for safeguarding and child protection (see final paragraph of section 2 of this safeguarding policy and procedures document).

Issues that will need to be taken into account are:

- the child's wishes and feelings
- the parent's right to know (unless this would place the child or someone else in

danger, or would interfere with a criminal investigation)

- the impact of telling or not telling the parent
- the current assessment of the risk to the child and the source of that risk
- any risk management plans that currently exist.

This procedure assumes the child is not in immediate danger. In the event that the child is in immediate danger, follow Procedure 1.

When to involve the local authority designated officer or team

TSL will report the allegation to the school in the first instance (assuming the school did not inform us). Where the accusation is serious (see below for a definition), TSL expects the school to either contact the designated officer or team (formerly known as the LADO) at the local authority where the child goes to school (within one working day) or instruct TSL to do so. In the event that this does not happen, TSL will contact the local authority directly. A serious accusation in this context means a person's behavior indicates they pose a risk to children. They may have:

- behaved towards a child or children in a way that indicates he or she may pose a risk of significant harm to children
- behaved in a way that has caused material harm or had the potential to cause material harm to a child
- has possibly committed a criminal offence against or related to a child

In many scenarios the local authority would be informed where the individual has behaved in a way that indicates they may not be suitable to work with children. (if the issue is with an ex-tutors, they would not have been based in the local authority, or the country and so this would not be required).

The local authority designated officer or team may be told of the allegation from another source. If this is the case, then the first information received by TSL may be when the local authority makes contact in order to explain the situation.

Whoever initiates the contact, there will be a discussion between the local authority designated officer or team and the TSL Designated Safeguarding Officer to share information about the nature and circumstances of the allegation, and to consider whether there is any evidence to suggest that it may be false or unfounded.

TSL will cooperate fully with schools, local authorities and police, including offering to have the TSL Designated Safeguarding Officer take part in local authority strategy discussion.

Dealing with a criminal offence

If there is reason to suspect that a criminal offence may have been committed (whether or not the threshold of 'significant harm' is reached), the local authority designated officer or team will contact the police and involve them in a similar strategy discussion. (Note that the relevant police might be the police forces of India or Sri Lanka.)

The Designated Safeguarding Officer and any other representative from Third Space Learning should cooperate fully with any discussion involving the police and should ask for similar cooperation from the police in terms of the sharing of information relevant to the person's employment.

Discussions with the police should also explore whether there are matters that can be acted on in a disciplinary process while the criminal investigation takes place, or whether disciplinary action must wait until the criminal process is completed.

Talking to parents about the allegation or concern

If the child's parents/carers do not already know about the allegation, TSL's Designated Safeguarding Officer will discuss with the school and the local authority designated officer whether TSL needs to be involved in this process.

Talking to the person who is the subject of the allegation

The person at the centre of the allegation should be informed as soon as possible after the initial consultation with the local authority designated officer or team. However, if a strategy discussion within the local authority children's social care team or the police is needed, this might have to take place before the person concerned can be spoken to in full. The police and children's social care department may have views on what information can be disclosed to the person.

Only limited information should be given to the person in question, unless the investigating authorities have indicated that they are happy for all information to be disclosed or unless there is no need for involvement from these statutory agencies.

The Designated Safeguarding Officer will need to keep in close communication with the local authority designated officer or team and the other agencies involved in order to manage the disclosure of information appropriately.

Taking disciplinary action

If the initial allegation does not involve a possible criminal offence, the Designated Safeguarding Officer and manager of the person at the centre of the allegation will still consider whether formal disciplinary action is needed.

If the local authority children's social care department has undertaken any enquiries to determine whether a child or children are in need of protection, the Designated Safeguarding Officer should take account of any relevant information from these enquiries when considering whether disciplinary action should be brought against the person at the

centre of the allegations.

The following timings should be kept to wherever possible, depending on the nature of the investigation:

- If formal disciplinary action is not needed, other appropriate action should be taken within three working days.
- If disciplinary action is required, and can be progressed without further investigation, this should take place within 15 days.
- If Third Space Learning decides that further investigation is needed in order to make a decision about formal disciplinary action, the Designated Safeguarding Officer should discuss with the local authority designated officer or team the possibility of this investigation being done by an independent person to ensure that the process is objective. Whether or not the investigation is handled internally or independently, the report should be presented to the Designated Safeguarding Officer within 10 working days.
- Having received the report of the disciplinary investigation, the Designated Safeguarding Officer should decide within two working days whether a disciplinary hearing is needed.
- If a hearing is needed, it should be held within 15 working days.
- The Designated Safeguarding Officer should continue to liaise with the local authority designated officer or team during the course of any investigation or disciplinary proceedings, and should continue to use the local authority designated officer or team as a source of advice and support.

If a criminal investigation is required, it may not have been possible to make decisions about initiating disciplinary proceedings or about the person's future work arrangements until this is concluded. The police are required to complete their work as soon as reasonably possible and to set review dates, so the Designated Safeguarding Officer should either liaise with the police directly or via the local authority designated officer or team to check on the progress of the investigation and criminal process.

The police are also required to inform the employer straight away if the person is either convicted of an offence or acquitted or, alternatively, if a decision is made not to charge him/her with an offence or to administer a caution. In any eventuality, once the outcome is known, the Designated Safeguarding Officer should contact the local authority designated officer or team to discuss the issue of disciplinary proceedings.

If the allegation is substantiated and if, once the case is concluded, Third Space Learning dismisses the person or ceases to use their services, or the person ceases to provide his/her services, the Designated Safeguarding Officer should consult with the local authority designated officer or team about referral of the incident to the Disclosure and Barring Service (DBS). This should take place within a month.

Checking other recordings and further risks

Where an investigation concludes that an ex-tutor had caused a child to be abused, then TSL will review all recordings of tuition between that ex-tutor and other pupils at any school that the ex-tutor may have taught in the past.

If this review finds further incidents of potential or actual abuse, then these will be flagged and shared with the local school, local authority and police, as appropriate, and a fuller investigation into those other occasions will be carried out.

If no other further incidents are detected in this review, then, TSL will contact the schools who have had sessions with the ex-tutor and inform them that:

- an ex-tutor who has, in the past, provided tuition to the school has been accused of an abuse act or acts and an investigation concluded that the accusation is substantively true
- The ex-tutor is no longer carrying out tuition
- That we have reviewed the recordings of the ex-tutor's past sessions pupils at their school and found nothing obviously abusive there
- We are telling them for completeness, and are happy to share the recordings of those tuition sessions with them.

Keeping a record of the investigation

All those involved in dealing with the allegation should keep clear notes of the allegations made, how they were followed up, and any actions and decisions taken, together with the reasons for these.

These notes should be compiled gradually as the situation unfolds, with each entry being made as soon as possible after the event it describes. The notes should be signed and dated by the person making them, and the person's name should be printed alongside.

The notes should be kept confidentially on the file of the person who is the subject of the allegation. Discussion should take place with the local authority designated officer or team to determine whether any aspects of the notes may not be shared with the person concerned. If there are no reasons not to do so, a copy of the records should be given to the individual.

The notes should be held on file for indefinitely, whether or not the person remains with Third Space Learning for this period.

Note on Information sharing, confidentiality and consent

TSL has a duty to share information with other agencies where it relates to safeguarding.

- Consent to share information should be sought where it is safe and appropriate to do so
- Information can be shared without consent if there is good reason to do so (i.e. to protect a child)

Information will be shared on a need to know basis: this might mean that the TSL are not told many details by the school, local authority or police. Likewise, the TSL DSO will apply the same principle with respect to sharing information within TSL.

The decision on what data to share within TSL and between TSL and other parties (the school, police, local authorities, etc) will be based on the HM Government's 2018 guidance document entitled: Information Sharing Advice for Safeguarding Practitioners (see <https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>, which uses these 7 golden rules for sharing information:

- General Data Protection Regulation 2016 (GDPR), Data Protection Act 2018 and human rights laws are not barriers to justified information sharing, but provide a framework to ensure that personal information about individuals is shared appropriately.
- Be open and honest with the individual (and/or their family) from the start about why, what, how and with whom information may be shared, and seek their agreement, unless it is unsafe and inappropriate to do so.
- Seek advice from others, including external agencies, if there is any doubt about sharing the information without disclosing the identity of the individual.
- Where possible, share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. You may share information without consent if you consider the facts presented that there is a lawful basis such as where safety may be at risk.
- Consider safety and well-being: base information sharing decisions on the safety and well-being of the individual and others who may be affected by their actions.
- Ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up to date, is shared in a timely fashion, and is shared securely.
- Keep a record of your decision and the reasons for it - whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

Useful contact details

Contact details for Designated Safeguarding Officer, Deputy Safeguarding Officer, Senior lead responsible for safeguarding are all listed in section 2.9

NSPCC Helpline: 0808 800 5000 - help@nspcc.org.uk

Child line: 0800 1111(textphone 0800 400 222) 0808 800 5000 or help@nspcc.org.uk

Local Authority Contact Details

Third Space Learning is physically located in the Tower Hamlets local authority and the contact details of the Local Authority Designated Officer (LADO), who can deal with allegations against professionals is: melanie.benzie@towerhamlets.gov.uk on 0207 364 0677 or 07903 238827.

Where the allegation is based in another local authority (likely), then please search for the “LADO” or “Local Authority Designated Officer” and the name of the local authority to find the relevant contact details. If you do not know the local authority, then please use this website and enter the postcode: <https://www.gov.uk/find-local-council>.

4. Updating this policy

Update policy

In harmony with our commitment to, and policy on, Quality Assurance and Continuous Improvement, we want to make sure we continuously improve our safeguarding and this includes wishing to make sure our safeguarding policy and procedures are reviewed at least once per year.

We will therefore review this policy each year and consider the following internal and external factors when reviewing it:

- a) Have there been any major safeguarding incidents involving Third Space Learning in the last 12 months that would be less likely to happen, or be less severe if they did happen, by changing this policy
- b) Have there been any major changes to the business since the last review. These could include a change in the business practices, ownership, customer base, technology used or partners (third parties).
- c) Have there been any changes in law that affect this policy and our procedures or do the changes in the latest annual release of the KCSIE guidance mean we need to update our safeguarding policy and procedures.
- d) Have any other, wider safeguarding issues, usually highlighted by external experts (e.g., NSPCC, Andrew Hall, etc), come to light that require us to update this policy.

While we aim to improve our safeguarding, we will not always do this through new policy, as we also try to improve our safeguarding through better training or by employing different technologies. We will not update the policy just for the sake of it.

Updates for 2025/26

This policy has been updated twice for 2025/26. The current version of this policy was last updated in February 2026 and the next update will be in or before August 2026.

July 25 changes

Most changes relate to the change in business practice of moving from using Human tutors to an AI tutor (Skye):

- List of the risks and mitigations of using AI Tutor
- Altering the procedures for how we react to a disclosure (with human tutors, they would try to elicit information and record it, the AI tutor's role is to alert a suitable human but not to try to elicit any details).
- Making explicit that all data is encrypted in transit and at rest.
- Updated to account for latest KCSIE 2025 guidance
- Updated reference to data retention schedule to include full Information Security Policy which includes data retention schedule

Feb 26 changes

- Made clearer the distinction between staff who we cannot do a children's barred list check against as the law Keeping Children Safe in Education says you cannot use a Barred List Check:

1. If the role does not involve teaching, training, caring for, or supervising children on a regular basis;
2. If the role is not at a "specified place" (like a school) that involves contact with children.

You cannot use a Barred List check if someone is in a role that does not meet the legal definition of regulated activity. As our tutoring is now provided by Skye, our spoken AI tutor, there are no staff who meet the requirements for a regulated activity. If we ever were to have any staff who met the requirements for a regulated activity, we would use a Barred List Check for them.

- Made clearer the role that the Timeslots Supervisor, or member of staff in the room where tutoring takes place has in safeguarding children (the Timeslot Supervisor can see and hear the entire room, they provide a level of contextual awareness and immediate intervention that an audio-only AI cannot replicate.)

- Added detailed section on Compliance with DfE Generative AI Product Safety Standards (Jan 2026) in 2.4

- Added that Third Space Learning holds Cyber Essentials certification