Safeguarding policy and procedures

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Contents

1. Introduction 1
2. Third Space Learning Safeguarding Policy Statement 2
- 2.1 The purpose and scope of this policy statement 2
- 2.2 Legal framework 2
- 2.3 Core beliefs 3
- 2.4 AI-specific safeguards 4
- 2.5 TSL Commitment to best practice safeguarding measures 8
- 2.6 Related policies and procedures 9
- 2.7 Definition, signs and symptoms of categories of abuse 9
- 2.8 Role and responsibilities 13
- 2.9 Designated Safeguarding Officer: Contact details 15

3. Third Space Learning Safeguarding Procedures 16
- Procedure 1: Child is in immediate danger 16
- Procedure 2: Children at possible risk of abuse 17
- Procedure 3: Dealing with allegations made against an employee / ex-tutor 17
- Note on information sharing, confidentiality and consent 19
- Useful contact details 20

4. Updating this policy 20

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. A short explanation explaining changes made since the last version is included in section 4.

This document covers the following safeguarding areas:

- Our safeguarding and child protection policy including what the main elements are 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 spoken one-to-one online AI maths tutoring.

The purpose of this policy statement is:

- to ensure TSL protects 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 directors, paid staff, contractors, volunteers, 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 Nations 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 2012
- Children and Families Act 2014
- Special educational needs and disability (SEND) Code of Practice; HM Government 2014 (updated January 2015)
- Counter-Terrorism and Security Act 2015
- The Children's Code (effective from 5 Oct 2021)
- Data Protection Act 2018 (including UK GDPR) - as amended by the Data (Use and Access) Act 2025,
- Working together to safeguard children: a guide to inter-agency working to safeguard and promote the welfare of children: HM Government 2023.

- Online Safety Act 2023
- DfE Policy paper: Generative artificial intelligence (AI) in education (Updated 10 June 2025)
- Data (Use and Access) Act 2025
- Keeping children safe in education 2026 (which came into force 1 September 2026)
- Crime and Policing Act 2026 (which changed the definition of regulated activity)
- 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. We review the effectiveness of these filtering and monitoring arrangements at least once each academic year and keep a record of that review;

- 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 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)	**Spoken interaction:** Skye (AI tutor) engages with students through voice only, using classroom components designed by maths teachers. Pupils can reply by speaking or typing. The visual component consists only of a shared whiteboard displaying TSL-approved learning content. **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. **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.
The AI generates biased answers or acts in a biased manner that unfairly discriminates against a protected characteristic	**Curated Learning Materials:** Skye's content is human-authored and monitored to avoid cultural bias. We encourage immediate feedback if staff spot any issues so we can adjust quickly. **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. **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.

Need to have local supervisors be alerted to harmful or inappropriate content being searched for or accessed	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: **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. **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.
Secure from hackers	We have adopted the best practices outlined in Cyber Security Standards for Schools and Colleges and in the "Cyber Essentials" framework and have secured Cyber Essentials certification. 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.

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 greatly reduced by design, and our red flag system monitors every session for anything that gets through.

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:** 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 training:** TSL does not use student data to train any AI model, whether its own or a third party's.
    - **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 note that the Crime and Policing Act 2026 removed the "supervision exemption" from the definition of regulated activity (reflected in KCSIE 2026). We have therefore re-assessed which, if any, of our staff now fall within regulated activity, for example anyone teaching, instructing or supervising children on more than three days in a month or overnight and obtain a Children's Barred List check for any staff who do.

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
- Recognise 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)
- Code of conduct for staff (found in the company handbook of our hr portal)
- Child protection records retention and storage policy (see our Information Security Policy)
- Whistleblowing policy (found in the company handbook of our hr 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 the NSPCC guidance (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, causing 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 the making or

sharing of nudes or semi-nudes (including images that are digitally altered or wholly generated using artificial intelligence, sometimes called 'deepfakes' or 'deep nudes').

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 knows 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 may include verbal abuse, such as persistent criticism, belittling, name-calling or sarcasm directed at the child. 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 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', excluding children from online activities or groups, setting up hate sites, or encouraging young people to self-harm. The most

obvious sign for our AI tutor 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 valuables stolen.

g. Prejudice based harm

Racism, faith-based prejudice and other forms of discrimination are harm in their own right and can significantly affect a child's welfare, wellbeing, mental health and willingness to seek help. Where a child discloses or describes such treatment during a session, it should be escalated via the Red Flag process in the same way as any other safeguarding concern.

h. Mental health

Poor mental health can be both a factor in, and a consequence of, abuse, neglect and exploitation, and is a safeguarding matter. While TSL's spoken AI tutor cannot make any mental-health assessment, staff and Skye should treat disclosures of significant distress, self-harm or suicidal ideation made during a session as a safeguarding concern and escalate them immediately via the Red Flag process so that the school (or, where a session is delivered at home, the parent/carer, or school's safeguarding lead can be immediately notified) can provide or arrange appropriate support. Staff should never promise a child to keep such a disclosure secret.

i. 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 or curtailment of civil liberties. We require our staff to read the DfE's guidance on the PREVENT duty; 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 is 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, and may be given things such as gifts, money, drugs, alcohol, status or affection in exchange for taking part in sexual activities. This can be committed or facilitated by an organised network or gang.
- 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 (CCE) is where children and young people are manipulated and coerced into committing crimes. The most common types are being asked to deliver illegal drugs from a central hub to local addresses of drug users (called “County Lines” by the UK police). This may constitute modern slavery and can be committed or facilitated by an organised network or gang.

j. Child-on-child abuse (including harassment and violence)

All types of harm can be caused by one child to another, not only by adults to children, so a potential safeguarding issue should never be discounted because the person responsible was also a child. Child-on-child abuse is a safeguarding issue for both the child who is harmed and the child who is alleged to have caused the harm, and it is preventable. It can take many forms, including: physical abuse; sexual harassment and sexual violence (which sit on a continuum from harmful sexual behaviour through to serious sexual violence, and may involve threats or weapons);discriminatory behaviour, including racism, faith-targeted abuse and other prejudice-based incidents; bullying, including online bullying and prejudice-based bullying ; abuse within children’s own intimate relationships; initiation or “hazing” type violence; and the making or sharing of nudes or semi-nudes. All incidents involving the sharing of nude or semi-nude images require a safeguarding response, whether they are consensual or non-consensual. Staff should also be alert to abusive, harassing or misogynistic/misandrist behaviour. If a child discloses any such behaviour during a session, our AI tutor should treat it as a safeguarding concern and escalate it via the Red Flag process.

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 where the school has set sessions for pupils to complete at home. In these cases, the parent or carer acts as 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; the child is upset by something unrelated to the AI tutor; or the AI tutor believes 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. The Timeslot Supervisor maintains full visual and auditory oversight of the physical classroom environment and is therefore better positioned to identify safeguarding risks such as non-verbal distress, physical bullying or environmental hazards than a spoken AI tutor.

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 means 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 the AI tutor can recognise signs of abuse and report these through our "Red Flag Process". Once the Red Flag is raised, 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 TSL's Schools Team, led by the Deputy Designated Safeguarding lead and reviewed by 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. The exceptions where we might not deal with the school in the first instance include: the child is in immediate danger and we can't contact the school; or 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, in accordance with our Child protection records retention and storage policy.

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 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.)
- Refer 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 a 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 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 will be able to take over any aspects of the DSO's 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). To ensure there is always cover, safeguarding concerns are routed to a confidential shared mailbox monitored by trained members of the Schools Team, and where neither the DSO nor the Deputy DSO is available an urgent concern is escalated to the Senior Lead for safeguarding so that it can be actioned without delay.

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 includes 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 broad safeguarding responsibilities: reporting safeguarding issues when they see them to the DSO or Deputy DSO (following the procedures outlined below); if there is a live safeguarding incident, prioritising removing the danger above all other work; and, in the event that any member of staff is concerned that a safeguarding concern is not being adequately addressed, raising the matter with the Senior Lead and, if still not satisfied, using the processes outlined in the whistleblowing policy, or approaching the local authority or police directly, as appropriate.

2.9 Designated Safeguarding Officer: Contact details

Designated Safeguarding Officer - Jenni Hoy (Head of Operations)

0203 771 0096 / jenni.hoy@thirdspacelearning.com. Most recent training date: 28th October 2026 (Level 3 Designated Safeguarding Lead / Level 3 Safeguarding Children).

Deputy Child Safeguarding Lead - Candida Crawford (Chief Learning Officer)

0203 771 0096 / candida.crawford@thirdspacelearning.com. Most recent training date: 12th September 2026 (Level 3 Designated Safeguarding Lead / Level 3 Safeguarding Children).

Senior lead for safeguarding and child protection - Tom Hooper

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, writes or types something that gives the AI tutor reason to believe the child is a victim of abuse); or someone connected with TSL is the subject of an accusation of abuse of a child. The procedures outlined are not an exhaustive list; if a potential incident occurs that is not covered here, contact the TSL Designated Safeguarding Officer.

Procedure 1: Child is in immediate danger

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 and a critical safeguarding issue arises; the responsible adult is unable to help; or the child is doing the sessions from home and there is a child protection issue there.

Immediate actions. The AI tutor has been programmed to try to recognise such scenarios, to establish whether the responsible adult (Timeslot Supervisor) is present and able to help, and to refer the child to them where 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, calling 999 for the emergency services, 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. (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 (or, in their absence, the Deputy DSO or the member of TSL's board who has responsibility for safeguarding) is made aware.

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:

1. The School Team will have received the alert that the AI Tutor created a Red Flag for the session at the time of the incident, including a timestamp of the issue.
2. A member of the Schools team (all of whom have been trained in safeguarding) reviews the session recording to observe the safeguarding incident or disclosure, completes an entry into our

Safeguarding Log, and, in conjunction with the Deputy DSO and DSO, decides on next steps (usually to contact the school).

3. Either the DSO or a member of the Schools team carries out the agreed action (usually contact the school), deals with any follow up, and records the actions taken in the safeguarding log.

The record of the incident shall be stored in accordance with TSL's Child protection records retention and storage policy (which includes the need to store this data separately 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

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.

We have programmed our AI tutor, Skye, 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 ask the child if they want to speak to the adult and, if not, to ask them if they are ready to proceed with the lesson.

Reporting/recording. The AI Tutor is programmed to complete a Red Flag alert. Thereafter, our School Team complete our Safeguarding log (our Record of Concern Form). There are 3 stages:

1. The School Team will have received the alert that the AI Tutor created a Red Flag for the session at the time of the incident, including a timestamp of the issue.
2. A member of the Schools team reviews the session recording to observe the safeguarding incident or disclosure, completes an entry into our Safeguarding Log, and, in conjunction with the Deputy DSO and DSO, decides on next steps (usually to contact the school).
3. Either the DSO or a member of the Schools team carries out the agreed action (usually contact the school), deals with any follow up, and records the actions taken in the safeguarding log.

The record of the incident shall be stored in accordance with TSL's Child protection records retention and storage policy.

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; to facilitate an appropriate level of investigation; 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; and to ensure that individuals are able to continue in their role if allegations are unfounded or malicious.

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 the 2024/25 academic year); and anyone in a managerial position (including the DSO, line managers, supervisors and trustees) who may be required to deal with such allegations.

What to do if an allegation is made. If the person who is the subject of the accusation is still working with children, the concern needs to be discussed immediately with a manager and the Designated Safeguarding Officer, one of whom should, in a sensitive manner, remove the staff member from direct contact with children. It should be explained to the person, in private, that a complaint has been made, although the details 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, they should not be working with children. If the person is a member of a trade union or professional organisation, they should be advised to contact that body, and arrangements should be made for ongoing support in line with the organisation's welfare responsibilities.

Conducting an investigation. 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 (or the local authority for children residing outside the UK) about whether a child is in need of protection; and investigation by an employer in respect of possible disciplinary action. This includes implementing a plan to manage any risk posed by the individual until the outcome of the other investigations is known.

Reporting an allegation or concern. If the allegation is made by a child or family member, or if a member of staff observes concerning behaviour by a colleague, this should be reported immediately to the staff member's manager and the DSO. If the concern is about the person's own manager, it should be reported to the person more senior to that manager. If the person who is the subject of the concern is the DSO, the matter should be reported to the Senior lead for safeguarding and child protection.

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, 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 means a person's behaviour indicates they pose a risk to children — for example they may have behaved in a way that indicates they may pose a risk of significant harm to a child, behaved in a way that caused or had the potential to cause material harm to a child, or possibly committed a criminal offence against or related to a child. TSL will cooperate fully with schools, local authorities and police, including offering to have the DSO take part in local authority strategy discussions.

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 strategy discussion. (Note that the relevant police might be the police forces of India or Sri Lanka.) The DSO and any other TSL representative should cooperate fully and explore whether there are matters that can be acted on in a disciplinary process while the criminal investigation takes place.

Talking to parents and to the person concerned. If the child's parents/carers do not already know about the allegation, TSL's DSO will discuss with the school and the local authority designated officer whether TSL needs to be involved in this process. 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, subject to the views of the police and children's social care about what information can be disclosed.

Taking disciplinary action. If the initial allegation does not involve a possible criminal offence, the DSO and the person's manager will consider whether formal disciplinary action is needed. Indicative timings, wherever possible: if formal disciplinary action is not needed, other appropriate action within three working days; if disciplinary action is required and can proceed without further investigation, within 15 days; if further investigation is needed, the report should be presented to the DSO within 10 working days (and the DSO should consider whether it should be carried out by an independent person); the DSO should decide within two working days whether a disciplinary hearing is needed; and if a hearing is needed it should be held within 15 working days. If the allegation is substantiated and TSL dismisses the person or ceases to use their services, the DSO should consult the local authority designated officer about referral to the Disclosure and Barring Service (DBS) within a month.

Checking other recordings and further risks. Where an investigation concludes that an ex-tutor caused a child to be abused, TSL will review all recordings of tuition between that ex-tutor and other pupils at any school the ex-tutor may have taught. If this review finds further incidents of potential or actual abuse, these will be flagged and shared with the local school, local authority and police as appropriate. If no further incidents are detected, TSL will contact the schools who had sessions with the ex-tutor to inform them of the situation and offer to share the recordings.

Keeping a record of the investigation. All those involved should keep clear, signed and dated notes of the allegations made, how they were followed up, and any actions and decisions taken, together with the reasons. The notes should be kept confidentially on the file of the person who is the subject of the allegation and kept on file for 50 years, in line with our data retention schedule, whether or not the person remains with Third Space Learning.

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 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 will be based on HM Government's guidance entitled "Information Sharing Advice for Safeguarding Practitioners" (https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice), which uses these golden rules for sharing information:

- The UK GDPR, the Data Protection Act 2018, the Data (Use and Access) Act 2025 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 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

NSPCC Helpline: 0808 800 5000 — help@nspcc.org.uk. Childline: 0800 1111.

Third Space Learning's registered office is physically located in the Swindon local authority and the contact details of the Local Authority Designated Officer (LADO), who can deal with allegations against professionals, are: lado@swindon.gov.uk on 01793 463854 (Swindon Borough Council Quality Assurance & Review Service, Clarence House, Euclid Street, Swindon SN1 2JH).

Third Space Learning's other office 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, are: LADO@towerhamlets.gov.uk on 020 7364 0677. Where the allegation is based in another local authority (likely), 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, use https://www.gov.uk/find-local-council and enter the postcode.

4. Updating this policy

Update policy. In harmony with our commitment to Quality Assurance and Continuous Improvement, we review this policy and procedures at least once per year. We 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, by changing this policy?

b) Have there been any major changes to the business since the last review (business practices, ownership, customer base, technology used or third-party partners)?

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), 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 through better training or by employing different technologies. We will not update the policy just for the sake of it.

Update October 2026

- We updated the wording throughout to reflect that pupils can type as well as speak to Skye, while Skye speaks and uses components created by maths teachers to deliver teaching content.
- We clarified that student data is not used to train any AI model, removed the risk-assessment requirement for sessions set at home (the parent or carer acts as the Timeslot Supervisor), aligned the retention period for allegation records with our 50-year data retention schedule, and updated the DSO's training date.
- To avoid confusion, we removed KCSIE 2025 from the legal framework, as KCSIE 2026, already listed, is now in force.

Update August 2026

Alignment with KCSIE 2026:

- Added KCSIE 2026 and the Crime and Policing Act 2026 to the legal framework, and re-tested the regulated-activity / Children's Barred List position following removal of the supervision exemption, including for staff who make school visits.
- Removed the superseded KCSIE 2024 and 2025 editions, leaving KCSIE 2026 as the version in force.
- Updated the Working together to safeguard children reference to the 2023 edition, and the information-sharing guidance to the May 2024 version.
- Corrected two legal-framework references: the Protection of Freedoms Act 2012 (previously mis-dated 2014) and the United Nations Convention on the Rights of the Child.
- Replaced sexting with making or sharing of nudes or semi-nudes and added AI-generated (deepfake) imagery.
- Expanded and renamed the child-on-child abuse section (including harassment and violence).
- Added a mental-health subsection.
- Added an annual filtering and monitoring effectiveness review, with a record kept (KCSIE para 173).
- Clarified DSL cover arrangements, including a confidential shared mailbox monitored by trained staff.

- Updated data-protection references to include the Data (Use and Access) Act 2025.
- Updated the Local Authority Designated Officer (LADO) details: added Swindon (registered office) as the home authority and refreshed the Tower Hamlets contact to the council's current LADO inbox.
- Updated the Designated Safeguarding Officer, Deputy DSO and Senior Lead contact details in section 2.9, with current safeguarding training dates.
- Updated section 2.4 to reflect the finalised DfE Generative AI Product Safety Standards.

Update February 2026

- Made clearer the distinction relating to which staff we cannot do a Children's Barred List check against, as KCSIE says you cannot use a Barred List Check if the role does not involve teaching, training, caring for, or supervising children on a regular basis, or if the role is not at a "specified place" (like a school) that involves contact with children.
- Because our tutoring is delivered by Skye, our spoken AI tutor, no member of staff currently teaches, instructs or supervises children on a regular basis through our service. However, following the removal of the "supervision exemption" by the Crime and Policing Act 2026, we have reviewed which staff activities (for example school visits) could bring an individual within regulated activity, and we obtain a Children's Barred List check for any member of staff who meets that definition (currently no member of staff meets this definition).
- Made clearer the role that the Timeslot Supervisor, or member of staff in the room where tutoring takes place, has in safeguarding children (they can see and hear the entire room, providing contextual awareness and immediate intervention that an audio-only AI cannot replicate).
- Added a detailed section on Compliance with DfE Generative AI Product Safety Standards (Jan 2026) in section 2.4.
- Added that Third Space Learning holds Cyber Essentials certification.

Update July 2025

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

- the list of risks and mitigations of using the AI Tutor;
- altering the procedures for how we react to a disclosure (the AI tutor's role is to alert a suitable human, not to elicit details);
- making explicit that all data is encrypted in transit and at rest;
- updated to account for the latest KCSIE 2025 guidance;
- and updated the reference to the data retention schedule to include the full Information Security Policy.