

Last updated: 23rd September 2026

1 Introduction

- 1.1 Bright Heart Education Ltd (company number 11179043) of 20-22 Wenlock Road, London, N1 7GU (the “**Company**”) requires tutors representing it to provide tuition to students in a congenial and safe environment.
- 1.2 The Company has a moral and legal obligation to ensure that, when given responsibility for young people, they are treated with the highest possible standard of care, that we safeguard them and promote their welfare, and that they are provided with a safe working environment. Children and young people with Special Educational Needs and Disabilities (SEND) can face additional safeguarding challenges.
- 1.3 Online safety is part of our comprehensive approach to ensure we meet our duty of care and our safeguarding and child protection policies and procedures.
- 1.4 This policy statement applies to anyone working on behalf of the Company, including directors, staff, and tutors.
- 1.5 This policy should be read in conjunction with the Company’s Safeguarding and Child Protection Policy, Anti-bullying Policy and Attendance Policy.
- 1.6 **Carol Minkoulou** is the Company’s **Designated Safeguarding Lead (DSL)** and **Online Safety Lead**. Carol can be reached on **0203 807 2894**.
- 1.7 **Rosie Gillman** is the Company’s **Deputy DSL** and **Deputy Online Safety Lead**. Rosie can be reached on **0203 807 2894**.
- 1.8 **Rebecca Reidel-Fry** is the Company’s **Deputy DSL** and **Deputy Online Safety Lead**. Rebecca can be reached on **0203 807 2894**.
- 1.9 **Ryan Stevenson** is the Company’s **Executive Lead for Safeguarding** and **Executive Lead for Online Safety**. Ryan can be reached on **0203 807 2894**.

- 1.10 Carol Minkoulou, Ryan Stevenson, Rosie Gillman and Rebecca Reidel-Fry are collectively referred to as the **Safeguarding Team**.
- 1.11 The Company operates a **dedicated safeguarding inbox** at safeguarding@brighthouse.co.uk, which is **monitored by the Safeguarding Team during working hours**. The Deputy DSLs provide cover when the DSL is unavailable.
- 1.12 The Safeguarding Team can be reached in an **after-hours safeguarding emergency** on **0203 807 2894**.
- 1.13 The Company and the Company’s DSL will keep abreast of any changes to legislation or best practices and update the Online Tutoring Policy at least annually, or sooner if required for changes in legislation.

2 The Company’s objectives

- 2.1 This policy has been created to safeguard all students, parents, legal guardians and tutors who are involved with delivering online tuition.
- 2.2 This document has been made accessible to all tutors and parents / legal guardians through our tutoring management system, TutorCruncher, with the idea of informing all stakeholders about the risks of online activity as well as the policies and procedures used to create a safe online learning environment and to prevent, identify and report any concerns.
- 2.3 The key responsibilities of the stakeholders involved in the process are detailed below. It is important that anyone using online tutoring familiarise themselves with this policy and consistently implement the knowledge and procedures included herein and those in the Safeguarding and Child Protection Policy.
- 2.4 The Company’s Online Safety Lead and Deputy Online Safety Leads will oversee online tutoring provisions and ensure compliance with this policy. Contravention of this policy could lead to suspension of the party from delivering / receiving online tuition.

3 Tutoring platform and recorded sessions

- 3.1 The Company recommends Pencil Spaces for tutoring sessions (<https://www.pencilspaces.com/>). Other platforms may be used, according to the preference of the tutor or the client (including schools), provided they are secure and support recording where required, save for platforms used when online provisions take place on school grounds under the direct supervision of a member of staff.
- 3.2 Sessions may be recorded in the cloud with prior notice and appropriate consent. For students under 18, consent will normally be obtained from the parent/carer (and the student, where appropriate). For adult learners, consent will be obtained from the learner unless another person is legally authorised to make the relevant decision.

Recordings can be reviewed for purposes such as disputes, allegations, safeguarding, quality assurance or training. The DSL may direct that a session is recorded where necessary for safeguarding. Recordings are accessible only to designated Bright Heart staff and, where relevant, commissioning bodies (e.g., a school/LA).

- 3.3 This platform allows audio and video, along with a shared whiteboard.
- 3.4 A private room link is sent by the tutor to the student using a designated email (school email or parent email); for students under 18, personal student email addresses should not be used unless written consent has been obtained from the parent/legal guardian. Adult learners may use their own agreed contact details, subject to normal professional boundaries.
- 3.5 The student clicks on the link and can either sign up or join as a guest. The tutor (host) can then let the student into the space, along with the parent (if they also would like to join). A video call can be started, which allows the tutor and student to see each other, while working on the shared whiteboard.
- 3.6 Log on/log off times are recorded on Pencil Spaces.
- 3.7 There is a chat function on Pencil Spaces.
- 3.8 Tutors upload files, images, and papers on the shared online whiteboard

and can type or draw on the board. Many Google apps are available for use by the tutor, which can aid engagement and add to the lesson quality by accessing information in real-time from different sources. There is also a good selection of resources for maths and chemistry.

- 3.9 Where a session is recorded, it is saved in a secure environment and accessible only to designated Bright Heart staff on a need-to-know basis. Access by others (e.g., a commissioning school/LA) is permitted only where contractually required or for safeguarding.
- 3.10 The Pencil Spaces webcam is used under student consent, and students can decline a video request if they feel uncomfortable.
- 3.11 Pencil Spaces adheres to high standards in privacy and online safety, including certifications such as COPPA, FERPA, HIPAA, SOC2, and GDPR.

4 Tutor responsibilities for delivering online tuition

- 4.1 **Follow their duty of care and ensure the safety and well-being of all students during online tutoring sessions;** this includes any type of online activity between tutor and tutee, including any activity on mobile phones, tablets or other devices used in the course of a tutoring session.
- 4.2 **Provide students with guidance on following safe and respectful online practices,** including, among others, guidance on how to prevent or respond to the following:
 - 4.2.1 cyberbullying,
 - 4.2.2 aggression and hate (including antisemitism);
 - 4.2.3 hacking and cybercrime;
 - 4.2.4 publishing or distributing inappropriate or dangerous material;
 - 4.2.5 radicalisation and extremism;
 - 4.2.6 sexual harassment and harmful sexual behaviour;
 - 4.2.7 grooming;

- 4.2.8 peer-to-peer pressure;
- 4.2.9 making or sharing nudes or semi-nudes, whether consensual or non-consensual, including images which have been digitally altered or generated using artificial intelligence;
- 4.2.10 misinformation, disinformation (including “fake news”) and conspiracy theories.
- 4.2.11 online gambling, inappropriate advertising, phishing and financial scams; or
- 4.2.12 harmful interactions with generative AI applications or other online users.

This guidance will be provided on a case-to-case basis, whenever it is deemed relevant for a particular student, but especially if an imminent risk has been identified.

- 4.3 **Tutors are also responsible for checking what filtering measures are in place in the student’s learning environment** (including the venue and the devices used by the student).

Tutors should consider the student’s vulnerability to outside influences such as grooming or county lines and the student’s digital resilience. This should take account of the student’s age, SEND, communication needs, cognitive understanding and ability to recognise and respond to online risks.

Should a risk be identified, it must be immediately included in the risk assessment, and the tutor is responsible for writing recommendations and strategies for prevention and mitigation.

Where tuition uses a school or local authority platform or device, tutors must follow that setting’s filtering/monitoring arrangements and escalate any concerns to the DSL.

Tutors must not record a session without prior notice and consent unless directed by the DSL for safeguarding.

- 4.4 Whilst the tutor is not ultimately responsible for installing or implementing online filtering measures, **tutors must check what**

measures are in place and issue recommendations for parents or carers if they feel children are not protected when engaging in online activity.

- 4.5 **Meet the parent / legal guardian online during the trial lesson for students under 18**, if they have not met in person before, **and provide guidance on how to keep their child safe online. Ensure they understand the requirement for a parent / legal guardian to be present in the home during online tuition.** For adult learners, Bright Heart may require a carer or other responsible adult to be present or readily available where this is considered appropriate having regard to the learner’s individual needs, vulnerability and risk assessment.
- 4.6 Where the client and tutor agree that tuition will take place in a public institution such as a public library without a parent / legal guardian present, the tutor will **ensure that the librarian (or equivalent responsible adult) is notified and aware of the tuition taking place.**
- 4.7 **Monitor the student’s online activity and behaviour, paying attention to the four Cs (content, contact, conduct, commerce) and escalate any concerns immediately to the DSL, a Deputy DSL, or via safeguarding@brightheart.co.uk**, following the procedures outlined in the Safeguarding and Child Protection Policy.
- This includes harmful interactions with generative AI applications, AI-generated or manipulated content (including explicit images/deepfakes), and misleading outputs. Where generative AI is used during tuition, tutors must not input confidential or personal information about a student and must check outputs for accuracy, suitability and safeguarding risk before sharing them with a student.
- 4.8 **Ensure their environment does not display any inappropriate images or content** which is capable of being viewed by the student / parent / legal guardian when delivering online tuition.
- 4.9 **Conduct a risk assessment** for all local authority provisions or any other provisions where a concern has been identified.
- 4.10 **Ensure their professional conduct follows the highest standards** i.e. use of appropriate language and treating students fairly and without

prejudice, following the Company's guidelines as outlined in the tutor's contract for service and The Tutors' Association code of ethics at all times.

- 4.11 **Follow their professional role as a tutor and ensure any contact with the student is within this role** and does not include the exchange of any personal information, such as personal phone numbers or social media contact information, among others.
- 4.12 **Avoid sending any unsolicited communications to the student.** For students under 18, direct communication is only permitted with parent/legal guardian consent. Communication with adult learners must remain through agreed professional channels and within appropriate tutor-student boundaries.
- 4.13 **Report any dispute with a student or parent/legal guardian to the Company.**
- 4.14 **Report any inappropriate behaviour or illegal activity** observed during the lesson by the student or third party, in accordance with the Company's Safeguarding and Child Protection Policy and the continuous professional development safeguarding modules that all tutors are required to complete.
- 4.15 **For unexplained absences, follow first-day calling and escalation** as set out in the Safeguarding & Child Protection Policy (3.3.18).
- 4.16 **Tutors need to report any continuous (explained) absences of the student by email or through a call to the Company**, in addition to recording it in the student lesson reports. Tutors must also be proactive and enquire about the reasons behind student absences, whenever possible.

5 The parent / legal guardian / responsible adult responsibilities for receiving online tuition

- 5.1 For students under 18, ensure that a parent / legal guardian is present in the home during online tuition. For adult learners, where Bright Heart

has identified additional safeguarding, care or support needs through consultation and/or risk assessment, a carer or other responsible adult may also be required to be present or readily available during tuition.

- 5.2 Be responsible for the welfare of the student during the session.
- 5.3 Be responsible for the physical environment of the student during the session.
- 5.4 Be available during a tutor session so any concerns encountered by the student can be reported as soon as possible and ensure the student and tutor are behaving in an appropriate manner.
- 5.5 Ensure that tutors will be treated with respect and fairness by the student and will not be subjected to abusive behaviour or language.
- 5.6 Ensure the student has no inappropriate communication with the tutor outside the lesson session.
- 5.7 Report any unsolicited communications between the tutor and student if appropriate.
- 5.8 Report any dispute with a tutor to the Company.
- 5.9 Report any inappropriate behaviour or illegal activity by a tutor to the Company.

6 The company's responsibilities

- 6.1 Deal with reports of possible illegal activity promptly, ensuring the safety and well-being of the student and/or tutor per the procedures set out in this document (see procedures section).
- 6.2 Handle any disputes efficiently and fairly without discrimination.
- 6.3 Review and update the policies and procedures at least annually to ensure they are relevant and adequate to safeguard all persons delivering and receiving online tuition.
- 6.4 Provide ongoing professional development for all tutors to help them identify and respond to online risks and to keep abreast of any

developments in online safety, including those included in the latest Keeping Children Safe in Education. Ongoing professional development will take place at least annually and will provide tutors with the knowledge and skills to ensure the online safety of every child.

- 6.5 Ensure that any images of children and their families are used on our website or social media platforms solely for educational purposes, following written consent; and
- 6.6 Ensure that our website, social media and Company-recommended online tutoring platforms, such as Pencil Spaces, are risk-assessed and reviewed at least annually for relevant safeguarding, privacy, access and security risks, with appropriate controls maintained where these are within the Company's control.

7 Online safeguarding concerns

7.1 Introduction

Each section below sets out the recommended procedure which should be followed in the event of a safeguarding concern (please reference Clauses 7 and 8 in the Safeguarding and Child Protection Policy).

It is always the responsibility of the person alerted to the incident to take some action to protect the student or third party. The procedures are not exhaustive, and you are advised to contact the Online Safety Lead, Carol Minkoulou, or the Deputy Online Safety Leads, Rosie Gillman or Rebecca Reidel-Fry, to discuss any concerns.

Ryan Stevenson, as Executive Lead for Online Safety, provides senior oversight and may be contacted where a safeguarding matter requires escalation beyond the DSL/Deputy DSLs

7.2 If a tutor sees or experiences:

- 7.2.1 **Inappropriate behaviour** – the tutor should politely request the student or third party to refrain from the behaviour and report it

to the Company. If it continues, the session should be terminated.

- 7.2.2 **Inappropriate or abusive images** – any display of adult pornographic images or other inappropriate content while in the presence of a student may constitute an offence under UK law. The tutor should terminate the session and report the matter to the Company.
- 7.2.3 **Making or sharing nudes or semi-nudes** – Any incident involving the making, sharing or display of a nude or semi-nude image of a person under 18, including an image that has been digitally altered or generated using artificial intelligence, must be treated as a safeguarding concern, whether the image-sharing appears consensual or non-consensual. The tutor must not view, download, copy, save or forward the image. The tutor should terminate the session where necessary to protect the student, make a factual record of what occurred without reproducing the image, and immediately report the matter to the Safeguarding Team.
- 7.2.4 **Abuse towards or in the presence of a student** – if a tutor receives information about such abuse from the student or other person present, they should follow the Company's safeguarding policy regarding disclosure.
- 7.2.5 **Any such abuse first-hand** – they should immediately record the incident details and contact the Company. The tutor should have no further contact with the student or other person involved in the incident. Any unsolicited contact from the student or other persons following the termination of the session should be reported to the Company.
- 7.3 **Disclosure of inappropriate / sensitive information** – During a session, a student or other person may offer sensitive information. If the information relates to any abuse or other safeguarding concern, the tutor should refer to the Company's safeguarding policy.
- 7.4 For **online tuition taking place in schools**, should there be a safeguarding incident, the tutor will **immediately report the incident to the Online Safety Lead**. The Online Safety Lead will contact the school's

safeguarding lead and, if necessary, the Local Authority.

- 7.5 For online tuition of students not in schools but still registered as students, should there be a safeguarding incident, the tutor will immediately report the incident to the Online Safety Lead. The Online Safety Lead will contact the student's school safeguarding lead and, if necessary, the Local Authority. Schools are responsible for the students' well-being and have a duty of care over each student, even if the student is under an alternative provision.

- 7.6 **Any situation where the child's immediate safety is threatened should be reported to the police (call 999) and to the Company.**

- 7.7 If a **student sees / experiences:**

- 7.7.1 **Inappropriate behaviour** – The student will inform a parent / responsible adult about the tutor's inappropriate behaviour. Should the parent / responsible adult deem the behaviour inappropriate, they may terminate the session and report the matter to the Company.

The student, parent / responsible adult should have no further contact with the tutor.

Any unsolicited contact from the tutor after termination of the session should be reported to the Company.

If a parent / responsible adult is not present or readily available, the student should report the behaviour as soon as possible to a parent/responsible adult who will take a decision to report the incident.

If the behaviour is of a sexual nature towards a student by a tutor, the student should immediately inform a parent / responsible adult and terminate the session. The parent/responsible adult should inform the Company immediately.

- 7.7.2 **Inappropriate or abusive images** – Any display of adult pornographic images whilst in the presence of a student may constitute an offence under UK law. Any student witnessing the display of adult pornographic images by a tutor should

immediately terminate the session and report this to a parent / responsible adult, who should inform the Company.

Any student who is shown a nude or semi-nude image of a person under 18, or is asked or pressured to make or share such an image, should end the interaction where it is safe to do so and tell a parent/responsible adult or another trusted adult as soon as possible. The Company should be informed immediately. The image should not be copied, saved or forwarded.

Any student witnessing a display of indecent images of a child should immediately terminate the session and report this to a parent/responsible adult, who should inform the Company.

The student, parent / responsible adult should have no further contact with the tutor involved in the incident.

Any unsolicited contact from the tutor following the discontinuation of the session should be reported to the Company immediately.

The display of any other images perceived to be inappropriate either due to the age of the student or the content of the image shall be reported to the Company at the discretion of the parent / responsible adult.

Where the tutor's immediate safety is threatened, this should be reported to the police and to the Company.

7.8 Parents and responsible adults

- 7.8.1 As per the policy document, the parent / responsible adult has primary responsibility for the welfare and safety of the student during a session and should be present or available to deal with any concerns or incidents reported by the student.
- 7.8.2 It is also the duty of the parent / responsible adult to ensure the well-being of the child if they have been affected by anything said or done by the tutor.
- 7.8.3 If a parent / responsible adult is alerted by the student to any inappropriate behaviour / language or information by the

student, or if they witness any inappropriate behaviour / language or information by the tutor, they should immediately speak to the tutor, state their concern and inform them they are terminating the session.

The incident should then be reported to the Company to take appropriate action.

The parent / responsible adult should have no further contact with the tutor involved in the incident.

Any unsolicited communication from the tutor should be reported to the Company.

- 7.8.4 If a parent / responsible adult is alerted by the student to any inappropriate or abusive images, or if they witness any inappropriate or abusive images displayed by the tutor, they should immediately speak to the tutor, state their concern and inform them they are terminating the session.

The parent / responsible adult should inform the Company.

The parent / responsible adult should have no further contact with the tutor involved in the incident.

Any unsolicited communication from the tutor should be reported to the Company.

8 Company procedures regarding online safeguarding

- 8.1 Any incident reported to the Company shall be reviewed as soon as possible to ensure a timely resolution, with steps taken per the Safeguarding and Child Protection Policy (Clause 8).
- 8.2 Note that if a report is received by the Company which concerns the immediate safety of a student or any illegal activity during a session, the Company will be required to contact the UK police to report the incident.

9 Information and additional support

9.1 Support for children

- 9.1.1 Childline (<https://www.childline.org.uk>) for free and confidential advice
- 9.1.2 UK Safer Internet Centre (<https://reportharmfulcontent.com>) to report and remove harmful online content
- 9.1.3 CEOP (<https://www.ceop.police.uk/safety-centre/>) for advice on making a report about online abuse
- 9.1.4 Lucy Faithfull Foundation – Shore Space (<https://shorespace.org.uk/>), for confidential chat support for young people concerned about their own or someone else's sexual thoughts or behaviours

9.2 Parental support

- 9.2.1 Childnet (<https://www.childnet.com/parents-and-carers/parent-and-carer-toolkit>) offers a toolkit to support parents and carers of children of any age to start discussions about their online life, to set boundaries around online behaviour and technology use, and to find out where to get more help and support
- 9.2.2 Commonsensemedia (<https://www.commonsensemedia.org/>) provide independent reviews, age ratings, & other information about all types of media for children and their parents
- 9.2.3 Internet Matters (<https://www.internetmatters.org/>) provide age- specific online safety checklists, guides on how to set parental controls on a range of devices, and a host of practical tips to help children get the most out of their digital world
- 9.2.4 Let's Talk About It (<https://www.ltai.info/staying-safe-online/>) provides advice for parents and carers to keep children safe from online radicalisation
- 9.2.5 London Grid for Learning (<https://parentsafe.lgfl.net/>) provides support for parents and carers to keep their children safe online, including tips to keep primary aged children safe online
- 9.2.6 Stopitnow (<https://www.stopitnow.org.uk/>) resource from The

Lucy Faithfull Foundation can be used by parents and carers who are concerned about someone's behaviour, including children who may be displaying concerning sexual behaviour (not just about online)

- 9.2.7 National Crime Agency/CEOP Education resources for online child protection (<https://www.ceopeducation.co.uk/>) provides support for parents and carers to keep their children safe from online sexual abuse
- 9.2.8 Parent info from Parentzone (<https://parentzone.org.uk/home>) and the National Crime Agency provides support and guidance for parents from leading experts and organisations
- 9.2.9 Net-aware (<https://www.net-aware.org.uk/>) provides support for parents and carers from the NSPCC and O2, including a guide to social networks, apps and games
- 9.2.10 Parentzone (<https://parentzone.org.uk/>) provides help for parents and carers on how to keep their children safe online
- 9.2.11 UK Safer Internet Centre (<https://saferinternet.org.uk/guide-and-resource/parents-and-carers>) provide tips, advice, guides and other resources to help keep children safe online monitoring environment
- 9.2.12 UK Chief Medical Officers' advice on screen time and social media (<https://www.gov.uk/government/publications/uk-cmo-commentary-on-screen-time-and-social-media-map-of-reviews>) provides guidance for parents and carers on balancing children's screen and social media use with healthy activities such as sleep, exercise and family time.