

SOPHYRA TUTORS LTD

Safeguarding and Child Protection Policy

Applies to: all tutors delivering sessions via the Sophyra Tutors platform.

Document control

Document title	Safeguarding and Child Protection Policy
Organisation	Sophyra Tutors Ltd
Owner	Designated Safeguarding Lead (DSL)
Version	1.0
Effective date	February 2026
Next review date	February 2027 (or sooner following a material change in law, guidance or operations)

1. Purpose

Sophyra Tutors Ltd is committed to safeguarding and promoting the welfare of children and young people. This policy sets out how we prevent harm, recognise concerns and respond promptly and appropriately.

Sophyra Tutors is an online tutoring platform. We connect students with independent freelance tutors for live 1:1 online sessions. We are a direct-to-learner service and primarily serve secondary and sixth-form students aged 13–18, as well as adult learners.

All tutors are independent freelance professionals. They are not employees of Sophyra Tutors Ltd. They hold a Sophyra Tutors Freelance Agreement, which incorporates their safeguarding obligations.

2. Scope

- All tutors delivering sessions via the Sophyra Tutors platform.
- All online sessions where the student is under 18 years of age, or is a vulnerable adult as defined under applicable legislation.
- All student data and safeguarding information received by or shared with Sophyra Tutors in connection with any session.

3. Definitions

- Child/minor: anyone under 18 years of age.
- Safeguarding: protecting children from maltreatment, preventing impairment of health or development, and ensuring safe and effective care.
- Child protection: activity undertaken to protect children who are suffering, or likely to suffer, significant harm.
- DSL: Designated Safeguarding Lead for Sophyra Tutors Ltd.
- Tutor: an independent freelance professional who delivers sessions via the Sophyra Tutors platform under a Freelance Agreement.

4. Legal and guidance framework

Sophyra Tutors Ltd is registered in England and Wales. We comply with applicable UK law and, where relevant, international data protection requirements. Our safeguarding standards align with recognised UK safeguarding guidance for organisations working with children and young people online.

- Children Act 1989 and Children Act 2004.
- Keeping Children Safe in Education (KCSIE) — adopted as a reference standard for safer working practice and online safety, as applicable to an online tutoring provider.
- Working Together to Safeguard Children (UK Government guidance).
- UK GDPR and the Data Protection Act 2018, including requirements for processing the personal data of children.
- ICO registration: ZC045375.

Where international tutors operate, Sophyra Tutors requires compliance with this policy as a condition of the Freelance Agreement. Where requirements differ across jurisdictions, we adopt the higher standard where possible and lawful.

5. Roles, responsibilities, training and vetting

Sophyra Tutors will maintain a Designated Safeguarding Lead (DSL) at all times. The DSL holds Level 3 safeguarding training (or equivalent) and refreshes training at least every two years.

Safeguarding contact:

safeguarding@sophyra.org (confidential inbox, monitored by the DSL)

All tutors accepted onto the platform must, prior to delivering any session to a student under 18:

- Hold a current enhanced DBS check (UK-based tutors) or an equivalent police check issued by the relevant authority in their country of residence (tutors based outside the UK).
- Provide a minimum of two professional references, verified by Sophyra Tutors before onboarding.
- Complete mandatory safeguarding training as specified by the DSL.
- Sign and return a Sophyra Tutors Freelance Agreement which incorporates this policy by reference.

Vetting records are retained securely in accordance with our Data Privacy Policy. Evidence of vetting can be provided to parents, guardians or statutory bodies on request, subject to lawful and proportionate sharing.

6. Safer working practice and code of conduct

All tutors delivering sessions via the Sophyra Tutors platform must:

- Conduct sessions from a suitable, professional setting free from third parties and distractions.
- Use the agreed Sophyra Tutors platform only. Sessions must not be moved to personal video conferencing tools, messaging apps or other platforms.
- Keep cameras enabled throughout each session unless there is a documented technical reason not to.
- Use professional communication channels only. Do not contact students via personal social media, personal messaging apps or personal email.

- Never exchange personal contact details directly with students or their parents or guardians outside of the Sophyra Tutors platform.
- Never request access to a student's device, accounts or files beyond what is strictly necessary for the lesson.
- Never record a session without the explicit prior written consent of the student (or their parent or guardian if the student is under 18) and Sophyra Tutors.
- Comply fully with all obligations set out in their Sophyra Tutors Freelance Agreement.

7. Recognising and responding to concerns

If a student appears to be in immediate danger, tutors should contact local emergency services without delay.

For all other concerns, tutors must follow these steps:

1. Listen and reassure the student. Do not promise confidentiality.
2. Record the concern promptly, using the student's words where possible. Note date, time and context.
3. Report to the Sophyra Tutors DSL as soon as possible and within 24 hours at the latest: safeguarding@sophyra.org.
4. Do not investigate. Preserve any relevant information and follow instructions from the DSL and, where applicable, statutory agencies.

8. Allegations against tutors

If an allegation is made that a tutor has harmed a child, may have harmed a child, behaved in a way that indicates they may pose a risk, or behaved in a way that is unsuitable for working with children:

- Report immediately to the Sophyra Tutors DSL at safeguarding@sophyra.org.
- The tutor will be suspended from the platform pending initial risk assessment and next steps.
- Sophyra Tutors will cooperate fully with relevant authorities and will not take any action that could compromise an investigation.
- The DSL will determine whether referral to statutory agencies is required and will act without delay if so.

9. Online session safety

All Sophyra Tutors sessions are delivered online. In recognition of the specific considerations that apply to online provision with young people:

- Sessions must take place via the agreed Sophyra Tutors platform only.
- Session links must not be shared with any third party.
- Tutors must not request screen-sharing access from students beyond what is necessary for the lesson and must not access any files or applications unrelated to the lesson.
- Tutors must not store, share or use student images or recordings obtained via sessions.
- Any safeguarding concern identified during a session must be reported to the DSL in accordance with Section 7 of this policy.

10. Information sharing, data protection and recordkeeping

Sophyra Tutors Ltd complies fully with the UK GDPR, the Data Protection Act 2018, and applicable international data transfer requirements. We are registered with the Information Commissioner's Office (ICO Registration: ZC045375).

We share information on a need-to-know basis and follow GDPR principles of lawfulness, fairness, transparency, data minimisation, accuracy, storage limitation, integrity and confidentiality.

- Safeguarding concerns are recorded and stored securely with restricted access.
- Student personal data is processed only for lawful purposes and is not shared with third parties except where required by law or to fulfil the safeguarding obligations in this policy.
- Records are retained in accordance with our Data Privacy Policy, unless longer retention is required by law.

Full details are set out in our Data Privacy Policy and Terms and Conditions, available at www.sophyratutors.com.

11. Monitoring and review

- This policy is reviewed annually and after any serious incident or material change in law, guidance or the nature of Sophyra Tutors' operations.
- The DSL maintains a training log and a safeguarding concern log (anonymised for reporting where appropriate).
- Sophyra Tutors conducts periodic checks that all active tutors remain compliant with the vetting requirements of this policy.

Next scheduled review: February 2027.

Appendix A: Safeguarding reporting flow (summary)

- Immediate danger: contact local emergency services. Inform DSL at safeguarding@sophyra.org as soon as possible.
- Online concern during or after a session: report to Sophyra Tutors DSL immediately at safeguarding@sophyra.org. DSL determines next steps with relevant authorities.
- Concern raised by a parent or guardian: contact safeguarding@sophyra.org. The DSL will acknowledge within one working day and confirm next steps.

Appendix B: Record of concern — minimum fields

- Student identifier (do not use full name in written records shared digitally unless strictly necessary).
- Date, time and context of the session or incident.
- Nature of the concern (facts only — no opinion or interpretation).
- Student's words, verbatim where possible.
- Actions taken and to whom the concern was reported.
- Follow-up actions and outcomes (if known).
- Name of the tutor or other person making the report.