

POLICY

Safeguarding and Child Protection Policy

How we keep every child who learns with Tallgrove safe, how we respond to concerns, and what everyone who works with us must do.

VERSION

1.0 (pre-launch edition)

APPROVED

17 October 2026

POLICY OWNER

Philopos Yassein, Designated Safeguarding Lead

NEXT REVIEW

September 2027, or sooner if the law or guidance changes

APPLIES TO

Everyone who works for or with Tallgrove, and every child who uses Tallgrove on PC, laptop, tablet or phone

If a child is in immediate danger, call 999.

Safeguarding concerns: safeguarding@tallgrove.co.ukChildren can talk to Childline free, any time, on **0800 1111**.

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DOCUMENT CONTROL

Version	Date	Changes	Approved by
1.0	17 October 2026	First edition, written before launch. To be reviewed by an independent safeguarding adviser before the private beta.	Philopos Yassein, Director and DSL

Key contacts

If a child is in immediate danger, call 999. Do not wait to speak to the Designated Safeguarding Lead first. Tell them as soon as the call is finished.

Role	Name	How to contact
Designated Safeguarding Lead (DSL)	Philopos Yassein	safeguarding@tallgrove.co.uk Safeguarding phone line: to be added before launch
Deputy Designated Safeguarding Lead	To be appointed before the private beta	safeguarding@tallgrove.co.uk
Director with overall responsibility for safeguarding	Philopos Yassein, Director, NEXFORMAI LTD	safeguarding@tallgrove.co.uk
Independent safeguarding adviser	To be appointed before the private beta	Contact details will be added here

The safeguarding mailbox is shared by the DSL and deputy DSL, so a concern is never missed because one person is away. Out-of-hours alerts from the Tallgrove platform go to whoever is on call.

A full list of external contacts, including the police, children's social care, the Local Authority Designated Officer (LADO) and national helplines, is in Appendix A.

1 About this policy

1.1 Why we have this policy

Tallgrove gives children one-to-one lessons with AI tutors. Children trust their tutor, often learn alone at home, and sometimes tell a tutor things they have not told anyone else. That gives us a real responsibility. This policy explains how we protect children who use Tallgrove, how we spot and respond to concerns, and what everyone who works for or with us must do.

1.2 What we mean by safeguarding and child protection

We use the definitions in the Department for Education's statutory guidance. Safeguarding and promoting the welfare of children means:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes.

Child protection is part of safeguarding. It is the activity we take to protect a specific child who is suffering, or likely to suffer, significant harm.

A **child** is anyone under 18. This includes 16 and 17 year olds who use Tallgrove for A-level study.

1.3 Who this policy applies to

- The director, employees, contractors, freelancers, volunteers and anyone on work experience with Tallgrove (together called “staff” in this policy).
- Subject specialists and examiners who check our lessons, mark schemes or mock-test marking.
- Anyone in the future who works directly with children, such as tutors on a human check-in service.
- Suppliers whose systems process children’s information or lesson content. Their duties are set out in our contracts with them.
- Every child who uses Tallgrove on any device: PC, laptop, tablet or phone.

1.4 Our principles

- **The child’s welfare comes first.** When there is a conflict between a child’s safety and anything else, including a parent’s wishes, our commercial interests or our reputation, the child’s safety wins.
- **Safeguarding is everyone’s responsibility.** Anyone who has a concern about a child must act on it straight away. Nobody should assume someone else will.
- **“It could happen here.”** We stay alert to the fact that harm can happen to any child, including children who seem happy and are doing well.
- **Children are listened to.** A child who tells us something is believed enough to be taken seriously, and is never made to feel that they are causing trouble.
- **Parents are partners.** Parents and carers see everything their child does on Tallgrove. We work with them, unless doing so could put the child at greater risk.
- **Safety is designed in.** We build safety into the product itself, and we test it, rather than relying on rules alone.
- **AI is honest about being AI.** Our tutors never pretend to be human, never keep secrets with a child and never try to replace the real people in a child’s life.

2

Our service and the risks we manage

2.1 How Tallgrove works

Tallgrove is an online tutoring service for children from Year 1 to Year 13, operated by Nexform AI (NEXFORMAI LTD). A parent or carer creates an account, chooses subjects for each child and picks a tutor for each subject. Lessons are delivered by AI tutors that speak, listen and write on an on-screen board. Lessons run on PC, laptop, tablet and phone, through the Tallgrove website and the Tallgrove app for iPhone, iPad and Android.

Important features for safeguarding:

- At launch there are **no human tutors**. Children only talk to AI tutors. No member of staff talks to a child directly.
- There is **no contact between children**. There are no chat rooms, forums, friends lists or shared spaces.
- The parent or carer is the account holder. Children do not need an email address, and they sign in with a code their parent approves for each device.
- Every lesson is saved as a **written transcript** that the parent can read.

- Many of the children we teach are **home educated**, so we may be one of the few organisations outside the family that has regular contact with them.

2.2 Risks we have identified

Risk	How we manage it
A child tells the AI tutor about abuse, self-harm or another serious worry	Automatic detection, a set response from the tutor, immediate alert to the DSL and clear steps for referral (sections 7 to 9)
The AI tutor says something harmful, inaccurate or unsuitable	Built-in filtering, a separate safety check on every reply, testing before every update and incident handling (sections 6 and 11.6)
A child becomes emotionally dependent on an AI tutor	Tutors are clearly AI, do not build personal relationships, remind children that AI cannot replace real people, and have session limits (section 6)
A child uses Tallgrove late at night or for very long periods	Default session limits, break prompts, parent-set lesson times and alerts for unusual patterns (section 6.6)
A child leaves a lesson to do something else online	The lesson pauses and the parent is alerted straight away (section 6.6)
An adult misuses a child's account or poses as a child	Parent-approved devices, account-sharing checks and pattern monitoring (section 6.7)
A parent or carer is the source of harm	The DSL decides whether to tell the parent, and may refer without telling them where that is safer for the child (section 9.3)
A member of staff or contractor misuses access to children's information	Safer recruitment, DBS checks, role-based access, access logs and a code of conduct (sections 12 and 11)
A home-educated child is not receiving a suitable education or is missing from view	We share concerns with the local authority and follow the law on children not in school (section 10.8)

3 Law and guidance we follow

Tallgrove is not a school or college, and some of the guidance below is statutory only for schools, colleges or public bodies. We follow it as good practice so that children get the same level of protection with us as they would in a well-run school.

3.1 Safeguarding guidance

- Working together to safeguard children 2026* (Department for Education), the statutory framework for multi-agency safeguarding in England.
- Keeping children safe in education 2026* (in force from 1 September 2026). We have regard to it, including its guidance on online safety, AI, filtering and monitoring, and the role of the DSL.
- Keeping children safe in out-of-school settings: code of practice* (Department for Education), which covers tuition providers.
- Generative AI: product safety standards* (Department for Education, updated January 2026). Section 6 explains how we meet them.

- *Information sharing: advice for practitioners providing safeguarding services* (Department for Education).
- *Prevent duty guidance*. Tallgrove is not a specified authority under the Prevent duty, but we follow the guidance as good practice.
- *Sharing nudes and semi-nudes: advice for education settings working with children and young people* (UK Council for Internet Safety).
- *Elective home education: guidance for local authorities and for parents* (Department for Education).

3.2 Legislation

- Children Act 1989 and Children Act 2004
- Children's Wellbeing and Schools Act 2026, including children not in school registers (we will meet any duties placed on us once regulations are in force)
- Crime and Policing Act 2026, including the mandatory duty to report child sexual abuse (we will meet the duty from the date it comes into force and already act in line with it)
- Safeguarding Vulnerable Groups Act 2006, including the duty to refer to the Disclosure and Barring Service
- Online Safety Act 2023
- UK General Data Protection Regulation, Data Protection Act 2018 and Data (Use and Access) Act 2025
- The Information Commissioner's Age Appropriate Design Code (the Children's Code)
- Sexual Offences Act 2003 and Protection of Children Act 1978
- Female Genital Mutilation Act 2003
- Counter-Terrorism and Security Act 2015
- Domestic Abuse Act 2021
- Modern Slavery Act 2015
- Equality Act 2010
- Public Interest Disclosure Act 1998

3.3 Children who live outside England

Tallgrove follows the English curriculum, but children anywhere in the UK may use it. When a concern involves a child who lives in Wales, Scotland or Northern Ireland, we follow that nation's procedures: the *Wales Safeguarding Procedures*, the *National Guidance for Child Protection in Scotland*, or *Co-operating to Safeguard Children and Young People in Northern Ireland*. The DSL contacts the children's services team where the child lives. If a child appears to be outside the UK and in immediate danger, we contact the police in that country where we can, and the UK police if we cannot.

4 Roles and responsibilities

4.1 The director

The director of NEXFORMAI LTD is accountable for safeguarding at Tallgrove. The director makes sure that:

- this policy is in place, followed, published and reviewed at least once a year
- a trained DSL and deputy DSL are appointed, with the time, authority and resources to do the job
- lessons only run while a DSL or deputy DSL is on call (see section 7.4)

- safer recruitment is followed and all required checks are made
- everyone receives training suited to their role
- safety is considered before any change to the product, the AI models or suppliers
- an independent safeguarding adviser reviews our practice at least once a year, because the director and the DSL are currently the same person.

4.2 The Designated Safeguarding Lead

The DSL takes lead responsibility for safeguarding and child protection, including online safety and the safety of our AI tutors. The DSL:

- reviews every safeguarding flag raised by the platform, within the times in Appendix C
- decides what action to take, makes referrals to children's social care, the police, the Prevent programme, the LADO and the Disclosure and Barring Service, and supports others to do so
- keeps accurate, secure safeguarding records
- works with parents and carers, and with local authorities and other agencies
- oversees filtering, monitoring and the safety checks on AI tutors, and knows what they detect and what they might miss
- makes sure staff training is up to date and keeps training records
- keeps up to date with changes to law and guidance, and updates this policy
- reports on safeguarding to the director at least every three months.

4.3 The deputy DSL

The deputy DSL is trained to the same standard as the DSL and covers the role when the DSL is not available. The DSL keeps overall responsibility. Before Tallgrove opens to families, the DSL and deputy DSL agree an on-call rota so that one of them is always available while lessons are running.

4.4 All staff

Everyone who works for or with Tallgrove must:

- read and understand this policy and the code of conduct, and confirm this in writing
- report any concern about a child to the DSL straight away, and call 999 first if a child is in immediate danger
- never investigate a concern themselves or promise a child that they will keep a secret
- report any concern about the behaviour of a colleague, contractor or the director (see section 11)
- report any harmful or unexpected output from an AI tutor as soon as they see it
- take part in the training set out in section 13.

4.5 Parents and carers

Parents and carers have the main responsibility for their child's safety at home. We ask them to:

- keep their contact details up to date so that we can reach them quickly
- make sure that a parent or carer is nearby during lessons for children under 11
- approve only devices their child uses, and keep the parent account secure
- read lesson reports and alerts, and talk to their child about anything that worries them

- tell us about anything that would help us keep their child safe, such as special educational needs or a recent upsetting event.

4.6 Suppliers

Suppliers that process children's data or lesson content, such as AI model providers, voice providers and hosting providers, must meet the safety, security and data protection terms in our contracts. These include not using children's data to train AI models, telling us promptly about any security or safety incident, and supporting our safety testing.

5 *Recognising abuse, neglect and exploitation*

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical, and the impact of seeing or hearing the ill treatment of others, such as domestic abuse. Children may be abused in a family, in an institution, in the community or online, by people they know or, more rarely, by strangers. They may be abused by adults or by other children.

5.1 The four main types of abuse

- **Physical abuse:** hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm, including fabricating or inducing illness.
- **Emotional abuse:** persistent emotional maltreatment that has severe and lasting effects on a child's emotional development. It includes making a child feel worthless or unloved, frightening them, exploiting or corrupting them, and serious bullying, including online.
- **Sexual abuse:** forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening. It includes non-contact activity, such as making a child look at sexual images, and grooming a child in preparation for abuse, including online.
- **Neglect:** the persistent failure to meet a child's basic physical or psychological needs, such as food, shelter, clothing, supervision, medical care or emotional support, likely to seriously impair their health or development.

5.2 Other safeguarding issues

Staff must also be alert to the following. Appendix B lists signs that may indicate each type of harm.

- **Online harm:** harm through content, contact, conduct or commerce (the "4Cs"), including grooming, cyberbullying, sextortion, scams and harmful content. Generative AI can be used to create harmful content and to manipulate children.
- **Nudes and semi-nudes**, including images that have been altered or created with AI ("deepfakes").
- **Child sexual exploitation and child criminal exploitation**, including county lines, where children are coerced into carrying drugs or money.
- **Serious violence**, including involvement with weapons, gangs and violent peer groups.
- **Radicalisation** and extremist views, including online.
- **Domestic abuse**, which children experience in their own right when it happens at home.
- **So-called honour-based abuse**, including female genital mutilation (FGM) and forced marriage.
- **Modern slavery and trafficking.**

- **Mental health concerns, self-harm and suicidal thoughts.** A mental health concern can be a sign that a child has suffered, or is at risk of, abuse or neglect. Staff and AI tutors never diagnose a mental health condition.
- **Bullying**, including bullying related to race, religion, sex, sexual orientation, gender identity or disability.
- **Children missing education** and children whose home education raises welfare concerns.
- **Young carers, privately fostered children**, and children whose family faces serious difficulties such as substance misuse.

Some children face extra barriers to being recognised and heard, including disabled children, children with special educational needs, children who are lesbian, gay, bisexual or gender questioning, and children who are isolated from other adults. Section 15 explains how we take this into account.

6 *Keeping children safe by design*

Our first line of protection is the way Tallgrove is built. This section sets out the safety rules our AI tutors follow and the controls built into the platform. They are based on the Department for Education's *Generative AI: product safety standards*, and we check ourselves against those standards at least once a year and before every major release.

6.1 Rules every AI tutor follows

- **Clear that it is AI.** Parents are told when they choose a tutor, and children are told on the welcome screen and before their first lesson, that tutors are AI. If a child asks whether the tutor is a real person, it says clearly that it is a computer program.
- **A teaching style, not a person.** Our tutors have names and teaching styles (Coach, Guide and Explorer) so children know which tutor teaches which subject. They never claim feelings, a private life, a family or a body, and they never say they are a friend.
- **No personal relationships.** Tutors stay on learning. They do not try to build a personal or emotional relationship with a child, and they remind children, when it is relevant, that AI cannot replace real people such as family, friends and teachers.
- **No secrets.** Tutors never agree to keep a secret and never suggest hiding anything from a parent or carer.
- **No personal information.** Tutors never ask for a child's address, school, phone number, social media accounts, photos or passwords, and never suggest meeting or talking outside Tallgrove.
- **No links out.** Tutors do not link to other websites, apart from approved help services such as Childline.
- **Hints before answers.** Tutors give hints first and show a full answer only after a real attempt, so children do the thinking.
- **No manipulation.** Tutors do not flatter, guilt, pressure or frighten children, and do not use false confidence. There is no advertising in lessons. Progress information, such as a learning streak, is shown for information only and is never used to pressure a child.
- **Safe topics only.** Tutors do not discuss sexual content, violence, self-harm methods, drugs, weapons, extremist material or other harmful topics, except where they are part of the curriculum and taught in an age-appropriate way.

6.2 Filtering

- Filtering is built into Tallgrove itself, not added on. It applies on every device, including home and personal devices.

- Everything a child says or types is checked before the tutor responds, and every tutor reply is checked by a separate safety system before the child sees or hears it.
- Filters detect harmful content across languages, common misspellings, slang and abbreviations.
- When something is blocked, the child sees an age-appropriate message explaining that the tutor cannot help with that, with a link to help if it is relevant.
- We test Tallgrove against attempts to get around its rules ("jailbreaking") before release and regularly afterwards.
- Children cannot upload photos, videos or files during lessons at launch. If we add uploads, images will be filtered before they reach the tutor.

6.3 Monitoring and transcripts

- Every lesson is recorded as a written transcript of what the child and the tutor said. Parents can read every transcript in their account.
- Possible safeguarding disclosures, attempts to access harmful content and signs of distress raise a flag for the DSL (see section 7).
- The DSL also reviews a sample of unflagged transcripts every week to check that detection is working.
- Monitoring is explained to children in an age-appropriate way: "Grown-ups at Tallgrove and your parent can read what you and your tutor say, to help keep you safe."

6.4 No contact with other people

- There is no way for children to contact each other, and no way for anyone else to contact a child through Tallgrove.
- Staff never contact a child directly. All contact is with the parent or carer who holds the account.
- If we introduce human tutors in future, this policy will be updated before that service starts, and all sessions will be recorded, visible to parents and delivered only by tutors with an enhanced DBS check with children's barred list information.

6.5 Voice, cameras and images

- When a child speaks, the audio is turned into text so the tutor can understand it, and the audio is then deleted. The transcript is kept.
- Tallgrove does not use cameras or facial recognition, and never takes or stores images of children.
- Tutor avatars are animated characters that families are told are AI. They are never used to imitate a real person.

6.6 Healthy use, session limits and leaving a lesson

- Lessons last 20 to 40 minutes, depending on age, with a prompt to take a break between lessons.
- Parents set the times of day when lessons are allowed and a daily limit. Tallgrove enforces these limits.
- Lessons are not available late at night by default. Use at unusual times, such as late at night, is reported to the parent and reviewed by the DSL if it forms a pattern.
- If a child closes the app, leaves the lesson or switches to another app or browser tab during a lesson, the lesson pauses and the parent is alerted straight away.
- We do not use design tricks to keep children online longer.

6.7 Accounts and devices

- Only adults aged 18 or over can open an account, and the account holder must have parental responsibility for the child or be the child's carer.
- Each device a child uses must be approved by the parent. Children sign in with a code, not an email address.
- We look for signs that an account is being shared outside the family or used by an adult posing as a child, and the DSL reviews any such flags.
- Only one lesson can run on a child's account at a time.

6.8 Data protection by design

We follow UK data protection law and the Children's Code. We collect only the information we need, keep privacy settings high by default, never sell data or show adverts to children, and never use children's data or work to train AI models. Full details are in our privacy policy.

6.9 Testing and change control

- Before Tallgrove launches, and before any new subject, tutor, feature or AI model goes live, we run safety tests that include realistic disclosures, distress, attempts to get harmful content, and attempts to make the tutor break its rules.
- Tests include children of different ages and needs, with parental consent, during the private beta.
- No change goes live until the DSL has seen the safety test results.
- Any safety failure found in testing or in live use is fixed, re-tested and recorded.

7 *How concerns come to light*

7.1 Ways we may become worried about a child

- A child says something to their tutor that suggests they are being harmed, are at risk or are very distressed.
- The platform detects a pattern, such as repeated distress, a sudden change in behaviour, very late use or repeated attempts to find harmful content.
- The DSL notices something in a transcript, including in a routine sample.
- A parent, carer, relative or another professional tells us something.
- A member of staff notices something while doing their job, for example when answering a support email.

7.2 Automatic flags

Our safety system gives every possible concern a level. The level decides what happens next and how quickly. Appendix C sets out the levels in full.

Level	Examples	What happens
1 · Wellbeing	Worry about exams, feeling tired or fed up	The tutor responds kindly and may suggest talking to a parent. Noted in the lesson report.
2 · Concern	Low mood over several lessons, bullying, repeated attempts to reach harmful content	The tutor responds with care and suggests a trusted adult. The parent is alerted unless that could put the child at risk. The DSL reviews.

Level	Examples	What happens
3 · Serious	A disclosure of abuse, self-harm, suicidal thoughts, exploitation or a plan to hurt someone	The lesson pauses. The child is shown how to get help now. The DSL is alerted immediately by phone and decides on referral and on contacting the parent.
4 · Emergency	A child says they are in danger right now, or are about to harm themselves or someone else	As level 3, and the DSL calls 999 straight away.

7.3 What automatic detection cannot do

No system catches everything. A child may hint at a worry without using words our system recognises, or may say nothing at all. That is why we also sample unflagged transcripts, why parents can read every lesson, and why staff must report anything that worries them even if the platform has not raised a flag.

7.4 Safeguarding cover

Lessons only run while the DSL or deputy DSL is on call. Lesson hours are shown in the app. If an alert is not acknowledged within 15 minutes, it is sent to the other DSL. The on-call DSL keeps their phone with them and must be able to act within the times in Appendix C.

8 *When a child tells us something*

8.1 What the AI tutor does

When a child shares a worry, the tutor follows a fixed response that has been written and tested by people, not improvised by the AI. Appendix D sets it out in full. In summary, the tutor:

- stays calm and thanks the child for telling it
- says that it is not their fault, if the child is describing harm done to them
- does not ask leading questions or try to find out more
- never promises to keep it secret, and explains in simple words that a grown-up at Tallgrove will read what they said so they can help keep them safe
- encourages the child to talk to a trusted adult, and gives Childline's number (0800 1111)
- tells the child to call 999 if they are in danger right now
- stops the lesson topic. The lesson is paused at levels 3 and 4.

8.2 What staff do if a child or adult tells them something

Staff do not speak to children directly, but they may receive information from a parent, another adult or a support email. If this happens:

- listen or read carefully, stay calm and take it seriously
- do not investigate, question the person in detail or contact anyone accused
- do not promise confidentiality. Explain that you must pass the information on to keep the child safe
- write down what you were told, as soon as possible and in the person's own words, using the guide in Appendix E

- tell the DSL straight away, and certainly the same day. If a child is in immediate danger, call 999 first.

8.3 Talking about worries in transcripts

Parents can read every transcript, including any part where their child shared a worry. In the rare cases where the DSL decides that a parent should not see part of a transcript because it could put the child at risk (see section 9.3), that part is hidden from the parent account while the DSL works with children's social care or the police. This decision is recorded with the reasons.

9 *Taking action and making referrals*

9.1 The DSL's decision

When the DSL reviews a concern, they consider what the child said or did, any earlier concerns, and what is known about the child and family. They then decide on one or more of the following:

- **No further action** beyond the tutor's response and the lesson report, with the reasons recorded.
- **Talking to the parent or carer** about the concern and suggesting support, such as their GP, the school if the child attends one, or a support service.
- **Suggesting early help.** With the parent's agreement, the DSL may suggest the family contacts their local authority's early help service.
- **A referral to children's social care** in the local authority where the child lives, if the child is in need or is suffering, or likely to suffer, significant harm.
- **Calling the police** on 999 if a child is in immediate danger or a crime is happening, or on 101 to report a crime that has already happened.
- **Other referrals**, such as the Prevent programme (section 10.4), CEOP for online sexual abuse (section 10.3) or the police for FGM (section 10.5).

If the DSL is unsure, they discuss the concern with the local authority's children's social care team, the NSPCC Helpline or our independent safeguarding adviser. A concern is never left without a decision.

9.2 Making a referral

- The DSL finds the right local authority using the child's home postcode from the parent account and the government's "report child abuse to a local council" service.
- Urgent referrals are made by phone straight away and confirmed in writing within 24 hours, using the local authority's referral form where it has one.
- The referral includes the child's name, date of birth, address, the concern in the child's own words, relevant transcript extracts, what we have already done and whether the parent has been told.
- If children's social care has not confirmed what will happen within three working days, the DSL follows up.
- If the DSL disagrees with a decision by children's social care and believes the child is still at risk, they use the local safeguarding partnership's escalation procedure.

9.3 Telling parents and carers

Normally, we tell parents about concerns and work with them. We do **not** tell a parent, or we delay telling them, where the DSL believes this could:

- put the child, or anyone else, at greater risk of harm
- lead to evidence being lost or a police investigation being harmed
- cause the family to move away or stop the child using Tallgrove in a way that cuts the child off from help.

In these cases the DSL agrees with children's social care or the police what the parent should be told, and when. The decision and the reasons are recorded. Where the concern involves the parent account holder, the DSL makes sure that platform alerts and transcripts do not reveal the concern to them before it is safe.

9.4 Consent and information sharing

We do not need consent to share information with children's social care or the police where a child is at risk of significant harm. Data protection law allows us to share information to keep children safe. Where it is safe and appropriate, we tell the parent that we are sharing information and why. See section 14.

9.5 After a referral

- The DSL keeps a record of every action, decision and outcome.
- The DSL decides whether the child should keep having lessons, and on what terms. Lessons can be a valuable source of routine and contact for a child, so we do not stop them automatically.
- The DSL co-operates fully with any child protection enquiry, strategy discussion or plan, and shares information as asked.
- The DSL looks after the wellbeing of any member of staff affected by a distressing case.

10 *Specific situations*

10.1 Self-harm and suicidal thoughts

We take every mention of self-harm or suicide seriously. Our tutors never give information about methods, never judge, and always point the child to human help. If a child says they are thinking about ending their life, or have harmed themselves, the concern is level 3. If they say they are about to act, or have taken something, it is level 4 and the DSL calls 999. The DSL contacts the parent urgently unless that could put the child at greater risk. The tutor shows Childline (0800 1111), Samaritans (116 123) and Shout (text SHOUT to 85258), and tells the child to call 999 if they are in danger now.

10.2 Nudes and semi-nudes, including AI-generated images

Children cannot share images on Tallgrove. If a child tells their tutor that a nude or semi-nude image of them, or of another child, has been shared or made, including an image altered or created with AI, the tutor never asks to see it and the concern is level 3. The DSL follows the UK Council for Internet Safety's advice, never views or copies the image, and considers a referral to children's social care and the police. The DSL can tell the family about Report Remove, run by Childline and the Internet Watch Foundation, which helps young people get nude images of themselves removed from the internet.

10.3 Online grooming and sexual abuse

If a child says that someone they met online has asked for images, asked to meet, asked them to keep secrets or threatened them, the concern is level 3. The DSL refers to the police and children's social care, and can report to CEOP, the National Crime Agency's child protection command. The DSL makes sure that no evidence is deleted.

10.4 Radicalisation and extremism

If a child expresses support for violence or extremist ideas, or describes contact with people who promote them, the DSL considers whether the child may be at risk of radicalisation. The DSL can seek advice from the local authority's Prevent team and make a referral so that the child can be considered for support through Channel. If there is an immediate risk, the DSL calls 999, or the Anti-Terrorism Hotline on 0800 789 321 for information about possible terrorist activity.

10.5 Female genital mutilation and forced marriage

If a child discloses that FGM has been carried out on them, or is planned, the DSL reports it to the police on 101, or 999 if it is about to happen, and to children's social care. If a child discloses a planned forced marriage, the DSL contacts the police and the Forced Marriage Unit, and does not contact the family first.

10.6 Domestic abuse

Children who see, hear or experience the effects of domestic abuse are victims of it. If a child describes domestic abuse at home, the DSL treats it as a level 3 concern and considers a referral to children's social care. The DSL takes particular care about what the parent account holder is told (section 9.3).

10.7 Exploitation and serious violence

Signs of criminal exploitation include a child talking about carrying things for others, unexplained money or phones, going missing, fear of particular people or new older friends. The DSL considers a referral to children's social care and the police, and any risk to the child from those exploiting them.

10.8 Home-educated children and children missing education

Most home-educated children are safe and well. However, because they may not be seen by a school, we stay alert to signs that a child is not receiving a suitable education or that their welfare is at risk. The DSL can share concerns with the local authority's elective home education team or children's social care. When the children not in school register provisions of the Children's Wellbeing and Schools Act 2026 come into force, we will meet any duty to give information to local authorities about children we educate.

10.9 Unusual patterns of use

Sudden changes, such as a child who stops using Tallgrove, a sharp drop in scores, very late use or repeatedly leaving lessons, can be a sign that something is wrong. Parents are alerted, and the DSL reviews patterns that persist or appear alongside other concerns.

10.10 Mandatory reporting of child sexual abuse

The Crime and Policing Act 2026 creates a legal duty for people in certain roles to report child sexual abuse. We already report all disclosures and suspicions of child sexual abuse to children's social care or the police. When the duty comes into force, we will update this policy to reflect the official guidance, and anyone covered by the duty will be trained on it. Nobody at Tallgrove may prevent or discourage anyone from making a report.

11

Concerns about staff, contractors and the AI

11.1 When this section applies

This section applies if anyone working for or with Tallgrove, including the director, the DSL, staff, contractors, subject specialists or volunteers, has:

- behaved in a way that has harmed a child, or may have harmed a child
- possibly committed a criminal offence against or related to a child
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children, or
- behaved in a way that indicates they may not be suitable to work with children, including behaviour outside work.

11.2 Reporting an allegation

- Report it the same day to the DSL. If the allegation is about the DSL or the director, report it directly to the Local Authority Designated Officer (LADO) and tell the independent safeguarding adviser.
- Do not investigate, and do not discuss it with the person concerned.
- The DSL contacts the LADO within one working day, before taking any other action except steps to keep children safe.
- We contact the LADO for the local authority where the person works or where the child lives, and agree with the LADOs which area takes the lead.

11.3 What happens next

The LADO advises on next steps, which may include a police investigation, a children's social care enquiry or an internal investigation. While this happens, the person's access to children's information may be suspended. Suspension is not a judgement that the allegation is true. We treat everyone fairly, keep them informed where we can and offer support.

11.4 Referral to the Disclosure and Barring Service

We have a legal duty to refer a person to the Disclosure and Barring Service (DBS) if we remove them from work with children, or would have done had they not left, because they harmed a child or posed a risk of harm. We make this referral even if the person resigns.

11.5 Low-level concerns

A low-level concern is any worry about a colleague's behaviour that does not meet the threshold in section 11.1 but is not in line with our code of conduct. An example is asking for access to a child's transcripts with no work reason. Low-level concerns are reported to the DSL, recorded and reviewed for patterns. Sharing them helps us keep a culture where everyone feels able to speak up.

11.6 When the AI tutor gets it wrong

If an AI tutor says something harmful, unsafe or inappropriate to a child, or fails to respond properly to a disclosure, we treat it as a safeguarding incident:

- The DSL reviews the transcript the same day, or immediately if the child may be at risk.
- The parent is told what happened and what we are doing about it.

- The cause is fixed, for example by changing the tutor's instructions or filters, and the fix is tested before the tutor is used again for that type of content.
- The incident is recorded, reported to the AI model provider where relevant, and included in the quarterly safeguarding report.
- Where the law or our regulators require it, such as for a personal data breach, we report to the relevant authority.

12 *Safer recruitment and conduct*

12.1 Checks before anyone starts

Everyone who will have access to children's information, lesson transcripts or safety systems has the following checks before they start:

- proof of identity and the right to work in the UK
- a Disclosure and Barring Service check at the highest level their role is eligible for. Anyone in regulated activity with children has an enhanced check with children's barred list information
- two references, including one from their most recent employer, checked directly with the referee
- an interview that includes questions about safeguarding and their motivation to work with children
- a check of any gaps in their employment history.

We keep a record of the checks for each person. People who recruit for Tallgrove complete safer recruitment training.

12.2 Contractors and suppliers

Contractors and agency workers with access to children's information must have the same checks, carried out by us or confirmed in writing by their employer. Supplier staff do not have access to identifiable children's information unless it is essential and covered by our contract.

12.3 Code of conduct

Everyone who works for or with Tallgrove must:

- never contact a child directly, by any means, and never accept contact from a child outside Tallgrove
- never connect with a child who uses Tallgrove on social media
- access children's information and transcripts only when their job requires it. All access is logged and checked
- never copy, download or share children's information except through approved Tallgrove systems for an approved purpose
- never use children's data or lessons for any purpose other than providing and improving the safety of the service
- never change an AI tutor's instructions or safety settings except through our tested release process
- report any concern, including about themselves, straight away.

Breaking the code of conduct may lead to disciplinary action, removal from work with Tallgrove and, where required, a referral to the LADO, the police or the DBS.

13 *Training*

Who	Training	How often
DSL and deputy DSL	Formal DSL training (often called level 3), including online safety, AI risks, filtering and monitoring, and referral procedures in England, Wales, Scotland and Northern Ireland	Before starting the role, refreshed at least every two years, with updates at least once a year
All staff and contractors	Induction on this policy, the code of conduct, signs of abuse, how to report a concern and how our safety systems work	Before starting, then at least once a year
Engineers and anyone who works on AI tutors	The Department for Education's generative AI product safety standards, safe prompt design, filtering and testing	Before working on tutors, then when the standards change
People who recruit	Safer recruitment	Before recruiting, refreshed every three years

The DSL keeps a record of all training and makes sure nobody works with children's information until their induction is complete.

14 *Records, confidentiality and information sharing*

14.1 Keeping records

- Every safeguarding concern, discussion, decision and action is recorded in our secure safeguarding system within 24 hours, using the guide in Appendix E.
- Records are factual, dated, timed and signed, use the child's own words where possible, and separate facts from opinions.
- Safeguarding records are kept separately from other records. Only the DSL, deputy DSL and, when needed, the independent safeguarding adviser can see them. Every access is logged.

14.2 Confidentiality

Safeguarding information is shared only with people who need it to keep a child safe. Staff must never promise a child or an adult that information will be kept secret. They must explain, in a way suited to the person, that information may need to be shared to keep a child safe.

14.3 Sharing information

Data protection law does not stop us sharing information to keep children safe. The Data Protection Act 2018 allows us to share sensitive information without consent where this is needed to safeguard a child, for example where asking for consent could put the child at risk or would cause harmful delay. Fears about sharing information must never get in the way of protecting a child. Each decision to share, or not to share, is recorded with the reasons.

14.4 How long we keep records

- Child protection records are kept until the child's 25th birthday, in line with the Information and Records Management Society's toolkit for schools, or longer if a public inquiry, legal case or the police require us to.
- Records of allegations against staff are kept until the person reaches normal pension age or for 10 years from the date of the allegation, whichever is longer. Allegations found to be false or malicious are removed from personnel records.
- Lesson transcripts that form part of a safeguarding record are kept with that record. Other transcripts are kept as set out in our privacy policy.

14.5 When a child stops using Tallgrove

If a child with an open safeguarding concern stops using Tallgrove, the DSL decides whether to tell children's social care or another professional working with the child, and records the decision.

15 *Children who may need extra help*

- **Children with special educational needs and disabilities** may find it harder to tell someone what is happening, and signs of abuse may be mistaken for their condition. Tutors adapt their language and pace, and the DSL takes extra care not to dismiss a concern for this reason.
- **Younger children** may describe harm in unexpected words. Our detection is tested with the language children of different ages use.
- **Children who are isolated**, including some home-educated children, may have few trusted adults outside the family. We make sure they are given details of Childline and other services that they can contact themselves.
- **Looked-after children and children with a social worker**: if a parent or carer tells us a child has a social worker, the DSL records the contact details so that any concern can be shared quickly.
- **Lesbian, gay, bisexual and gender questioning children** can be targeted by others. Concerns are handled in line with current guidance, with early DSL involvement, and the child is treated with respect.
- **Children who speak English as an additional language**: our filters work across languages, and the DSL uses professional interpreters, not family members, when needed for a referral.

16 *Whistleblowing*

Anyone who works for or with Tallgrove and is worried about the way we keep children safe, including the way this policy is being followed, should raise it with the DSL or the director. If the concern is about the DSL or the director, or they feel it has not been dealt with, they can contact the independent safeguarding adviser or the NSPCC Whistleblowing Advice Line on 0800 028 0285. People who raise concerns in good faith are protected by law, and we will not tolerate anyone being treated badly for speaking up.

17 *Complaints*

Parents, carers and children can complain about the way we have handled a safeguarding matter through our complaints procedure, published on our website. Complaints about safeguarding are dealt with by someone not involved in the original decision. Making a complaint never stops us from acting to protect a child. Parents can

also contact the NSPCC Helpline or their local authority for advice.

18 *Monitoring and review*

- The DSL reports to the director at least every three months on flags, response times, referrals, AI incidents, test results, training and any lessons learned.
- The independent safeguarding adviser reviews our practice, including a sample of cases, at least once a year.
- We check Tallgrove against the Department for Education's generative AI product safety standards at least once a year and before major releases.
- This policy is reviewed at least once a year, usually after each new edition of *Keeping children safe in education* is published. It is also reviewed after any serious incident or change in law, and before any new type of service starts, such as human tutors.
- The latest version is always published on the Tallgrove website.

A *Appendix A: Contacts and helplines*

Emergencies and reporting

Service	When to use it	Contact
Police (emergency)	A child is in immediate danger or a crime is happening now	999
Police (non-emergency)	Reporting a crime that has already happened, including FGM	101
Children's social care	Referrals about a child in need or at risk of significant harm	The council where the child lives. Find it at gov.uk/report-child-abuse-to-local-council
Local Authority Designated Officer (LADO)	Allegations against anyone working for or with Tallgrove	The LADO for the area where the person works or where the child lives, through that council
CEOP (National Crime Agency)	Online sexual abuse or grooming	ceop.police.uk
Anti-Terrorism Hotline	Information about possible terrorist activity	0800 789 321
Prevent advice	Concerns about radicalisation	The local authority's Prevent team, or the police on 101
Internet Watch Foundation	Reporting child sexual abuse images online	report.iwf.org.uk
Report Remove (Childline and IWF)	Helping a young person remove a nude image of themselves online	childline.org.uk/remove
Disclosure and Barring Service	Barring referrals	gov.uk/dbs
Information Commissioner's Office	Reporting serious personal data breaches	ico.org.uk · 0303 123 1113

Advice for adults

Service	Contact
NSPCC Helpline (adults worried about a child)	0808 800 5000 · help@nspcc.org.uk
NSPCC Whistleblowing Advice Line	0800 028 0285
NSPCC Report Abuse in Education	0800 136 663
NSPCC FGM Helpline	0800 028 3550

Service	Contact
Professionals Online Safety Helpline (UK Safer Internet Centre)	helpline@saferinternet.org.uk

Help for children and young people

Service	Contact
Childline	0800 1111 · childline.org.uk (free, any time)
Samaritans	116 123 (free, any time)
Shout	Text SHOUT to 85258 (free, any time)

B *Appendix B: Signs that may indicate harm*

These signs do not prove that a child is being harmed, and some children show no signs at all. On Tallgrove, most signs will come from what a child says or how their use changes. Any of them, especially in combination, should be reported to the DSL.

Type of harm	Signs a child may show or describe
Physical abuse	Talking about being hurt, hit or punished in ways that cause injuries; fear of going home or of a particular adult; unexplained injuries mentioned in passing
Emotional abuse	Very low self-esteem ("I'm stupid", "nobody wants me"); being frightened of getting things wrong; describing being shouted at, threatened or humiliated; extreme need for approval
Sexual abuse	Sexual knowledge or language unusual for their age; talking about secrets with an adult; describing being touched, shown images or asked for images
Neglect	Often hungry, tired or unwell; left alone for long periods; talking about having no one to look after them; using Tallgrove very late at night
Online harm and grooming	A new older "friend" online; being asked for photos; being given gifts or money; being told to keep a relationship secret; threats to share images
Exploitation	Talking about carrying things for others, owing money, new phones or money, going missing, or fear of particular people
Radicalisation	Expressing support for violence or extremist groups; using extremist language; describing contact with people who encourage these views
Domestic abuse	Describing fighting, shouting or violence between adults at home; worry about a parent's safety
Mental health, self-harm and suicide	Persistent sadness, hopelessness or anxiety; talking about hurting themselves or not wanting to be alive; giving up on learning; sudden withdrawal

Type of harm	Signs a child may show or describe
Missing education or welfare concerns in home education	Very little learning taking place over a long period; not having been seen by anyone outside the family; describing being kept at home for reasons that worry them

C

Appendix C: Concern levels and response times

Level	Automatic response	Parent	DSL action
1 · Wellbeing	Tutor responds kindly and may suggest talking to a parent. Lesson continues.	Mentioned in the after-lesson report	Reviewed in the weekly sample, or sooner if it repeats
2 · Concern	Tutor responds with care, pauses the topic and suggests a trusted adult and Childline.	Alerted straight away, unless this could put the child at risk	Reviewed within 24 hours
3 · Serious	Lesson pauses. Tutor gives the fixed response and shows help services.	The DSL decides whether, when and how to tell the parent	DSL alerted by phone immediately. Reviewed within 1 hour. Referral decision the same day
4 · Emergency	As level 3, and the child is told to call 999 if they can.	Contacted urgently unless this could put the child at risk	DSL calls 999 straight away, then refers to children's social care

If an alert is not acknowledged within 15 minutes, it goes to the other DSL. Every flag is closed with a recorded decision.

D

Appendix D: What our AI tutors say when a child shares a worry

These responses are written and approved by the DSL. The tutor adapts the wording to the child's age, but must keep every element. They are tested before every release.

- 1. Listen and thank them.** "Thank you for telling me. That sounds really hard."
- 2. Reassure them.** "You've done the right thing by telling someone. It's not your fault."
- 3. Be honest about what happens next.** "I'm an AI, so I can't help with this on my own. A grown-up at Tallgrove whose job is to keep children safe will read what you've told me, so they can help."
- 4. Point them to people.** "Is there a grown-up you trust, like someone in your family, that you could talk to today? You can also talk to Childline any time, for free, on 0800 1111."
- 5. Keep them safe now.** "If you're in danger right now, please call 999."
- 6. Pause the lesson.** "Let's stop the lesson here for now. You can come back to it later."

The tutor never asks for more detail, never suggests what might have happened, never promises secrecy and never says it will contact anyone itself unless that is true.

***E** Appendix E: Recording a concern*

Every safeguarding record should include:

- the child's name, date of birth and parent account details
- the date and time of the concern, and when and how it came to light
- exactly what was said or seen, in the child's own words, with the transcript extract
- who else was told, when and why
- the DSL's assessment of risk and the decision, with reasons
- actions taken, including referrals, with reference numbers and the names of professionals spoken to
- whether the parent was told and, if not, why not
- follow-up actions, who is responsible and by when
- the outcome, and when the record was closed
- the name and role of the person making the record, with the date and time.

***F** Appendix F: Glossary*

Child	Anyone under the age of 18.
DSL	Designated Safeguarding Lead: the person with lead responsibility for safeguarding at Tallgrove.
Early help	Support for children and families as soon as problems emerge, usually co-ordinated by the local authority.
LADO	Local Authority Designated Officer: the person in each local authority who manages allegations against people who work with children.
Regulated activity	Certain work with children defined in law. People in regulated activity must not be barred from working with children.
DBS	The Disclosure and Barring Service, which carries out criminal record checks and decides who is barred from working with children.
Significant harm	The threshold in the Children Act 1989 at which the local authority must make enquiries to decide whether to act to protect a child.
Transcript	The written record of everything said and written by a child and their AI tutor in a lesson.
Flag	An automatic alert raised by Tallgrove's safety system when a lesson may contain a safeguarding concern.
Filtering	Checks that stop harmful content reaching a child or being produced by an AI tutor.
Monitoring	Recording and reviewing what happens in lessons so that concerns can be found and acted on.

Prevent and Channel The government's programme to stop people being drawn into terrorism, and the voluntary support offered to people at risk.