



New Way Tuition

Safer Recruitment

Effective Date: 1 September 2026

Review by Date: 31 August 2027

Signed: M Ward Managing Director

Safer Recruitment Statement:

We are committed to safeguarding and promoting the welfare of all children and young people and expect every member of staff, volunteer, contractor, and visitor to share this commitment. Our recruitment and selection processes are designed to identify, attract, and appoint individuals who are suitable to work with children and who uphold the highest standards of professional conduct.

As an Alternative Provision, we recognise that many of our learners may be vulnerable and require a safe, consistent, and nurturing environment. We therefore take our responsibility to recruit safely extremely seriously and follow statutory guidance, including *Keeping Children Safe in Education (KCSIE)* and all relevant safeguarding and employment legislation.

Our safer recruitment procedures include:

- Clear job descriptions and person specifications that emphasise safeguarding responsibilities.
- Safeguarding-focused application and interview processes, including questions that assess candidates' attitudes towards child protection and professional boundaries.
- Verification of identity, qualifications, employment history, and the right to work in the UK.
- Obtaining and scrutinising appropriate references before appointment wherever possible.
- Enhanced Disclosure and Barring Service (DBS) checks, including Children's Barred List checks where applicable.
- Online searches for shortlisted candidates in accordance with current statutory guidance.
- Verification of professional status where required and checks against relevant prohibition lists.
- A probationary period with appropriate supervision, induction, and mandatory safeguarding training.

All staff receive safeguarding induction on appointment and ongoing training to ensure they understand their responsibilities for protecting children, recognising signs of abuse or neglect, and reporting concerns promptly. Safeguarding is embedded throughout our culture, policies, and day-to-day practice.

We are committed to creating a diverse and inclusive workforce and welcome applications from individuals of all backgrounds. Recruitment decisions are made on merit while maintaining our unwavering commitment to safeguarding and promoting the welfare of children and young people.

Any applicant who does not meet the required safeguarding standards or who fails to disclose relevant information may have their application withdrawn or any offer of work revoked.

Legislation / Guidance that informs this policy

- Education Act 2002 (s.175/s.157 as applicable)
- The Education (Independent School Standards) (England) Regulations 2014
- Keeping Children Safe in Education (KCSIE) 2026
- Safeguarding Vulnerable Groups Act 2006 (as amended) & Protection of Freedoms Act 2012
- Data Protection Act 2018 & UK GDPR
- Disqualification under the Childcare Act 2006 (where applicable)
(If you're an AP provider working with placed pupils, keep ISSR if applicable; otherwise cite KCSIE as best practice for AP.) GOV.UK

This policy supports the organisation's Safeguarding Policy.

Other New Way Tuition policies to be read in conjunction with this one;

- Safeguarding and Child Protection
- Whistleblowing
- Allegations Against Staff
- Staff Code of Conduct
- Data Protection
- Single Central Record

Statement of intent

New Way Tuition is committed to ensuring that all children accessing our provision remain safe. A key element of this commitment is the organisation's policy and practice regarding the recruitment and retention of staff, trustees, and volunteers.

Responsibility for Implementation

The DSL (designated safeguarding lead) is responsible for ensuring good safer recruitment practice i.e. that no 'unsuitable' person is employed/offered work by New Way Tuition or works as a trustee or volunteer. At least one person on every interview panel will have completed safer recruitment training covering the content of KCSIE Part 3. We complete section 128 checks for individuals in management positions (e.g., Head/Deputy, trustees, proprietors). Where not eligible for a barred-list check, we complete a separate s128 via GOV.UK/Check a teacher's record.

Statutory requirements

The Safeguarding Vulnerable Groups Act (2006) established the Independent Safeguarding Authority (ISA) to make decisions about individuals who should be barred from working with children and to maintain a list of these individuals. The Protection of

Freedoms Act (2012) merged the ISA with the Criminal Records Bureau (CRB) to form a single, new, non- departmental public body called the Disclosure and Barring Service (DBS)

Under the Safeguarding Vulnerable Groups Act (2006) it is an offence for an employer to knowingly employ/offer work to someone in a regulated position if that person is barred from such work. It is also an offence for the individual who has been barred to apply for a regulated position (one which involves spending regular time working with children).

The Protection of Freedoms Act (2012) reduced the scope of 'regulated activity' by focusing on whether the work is unsupervised (in which case it counts as 'regulated activity') or supervised. The new definition of regulated activity came into force on 10 September 2012 and was issued in conjunction with guidance on the level of supervision required to take work out of the scope of regulated activity. If supervised, and supervision meets the statutory test, the role may fall **outside** regulated activity (see Annex E).

The Safeguarding Vulnerable Groups Act (2006) also imposed the legal requirement on employers to refer to the ISA (now DBS) information about employees or volunteers who (may) have harmed children while working for them.

In 2013 (updated July 2015, further in May and September 2016 and again in September 2020) the DfE issued further statutory guidance: 'Keeping Children Safe in Education'.

Compliance with this guidance (for independent schools) is required under section 157 of the 2002 Education Act.

Practice:

As required within this statutory guidance, New Way Tuition will ensure that it:

"Operates safe recruitment procedures including making sure that statutory duties to check staff who work with children are complied with and statutory guidance relating to volunteers is followed" ... and, "that proportionate decisions are taken on whether to require any checks beyond that and recruitment panel members are properly trained".

New Way Tuition will ensure that in pursuing safe recruitment procedures it does not discriminate against anyone for reasons of disability. In accordance with the 2010 Equality Act we will do all that we can to ensure any applicants with a disability suffer no discrimination whatsoever, and that, should they be appointed, they are supported to carry out their duties effectively (See Disability and Discrimination Policy).

New Way Tuition will ensure that no person who is known to pose a risk of harm to children engages in any 'regulated activity' or is engaged by the organisation in any role regardless of whether that role involves engagement in regulated activity.

Regulated activity is defined as 'having the opportunity for contact with children' specifically, through:

- teaching, training, caring or supervising young people to include all work carried out within a school or an education setting.
- providing advice or guidance on the wellbeing of young people.
- driving a vehicle that is being used solely for the purpose of transporting young people.

Checks on new staff:

DfE regulations for schools contain a statutory duty that schools must obtain a barred list check with an Enhanced criminal records check for newly appointed staff. An Enhanced DBS check, including a children's barred list check where the role involves regulated activity, will be obtained before appointment.:

- a school in England in a post which brought them into regular contact with children or any post they were appointed to since 12 May 2006.
- an FE college in England in a position which involved the provision of education and regularly caring for, training, supervising or being in sole charge of children or young people under the age of 18... but, whilst an employee or temporary staff, may begin employment/work, New Way Tuition practice is to check all DBS and those that are not on the update system but are Enhanced, New Way Tuition may request a new Enhanced DBS where it considers this necessary as part of its safeguarding risk assessment.

Recruitment procedure:

Advertising

When a post becomes vacant or a new post is created, an appointment group will ensure that an appropriate job description and person specification are written. The group will decide where adverts are to be placed and set closing dates for application, together with shortlisting and interview dates. All job posts and advertisements will include a statement expressing New Way Tuition's commitment to safeguarding its pupils that appropriate safeguarding checks will be undertaken.

Applications

Applicants may submit a CV for background information; however, every applicant must complete the New Way Tuition application form in full. Employment history, qualifications and any gaps in employment must be fully explained. The application form requires candidates to provide details of two referees, including their current or most recent employer.

Shortlisting

Shortlisting will take place against the requirements within the person specification and candidates notified as to their success or otherwise within three days of the process being undertaken. Two people, trained in safer recruitment will determine the short list. References will be sought before the interview where possible so concerns can

be explored at interview. shortlisted candidates will be asked for a self-declaration about relevant matters including:

- criminal convictions
- cautions
- barred list status
- prohibition orders
- section 128
- childcare disqualification
- overseas criminal history
- ongoing investigations where appropriate

As part of shortlisting due diligence we **may conduct an online search** on shortlisted candidates. Candidates are informed we may do this so that any publicly available concerns can be explored at interview, in line with KCSIE and our data protection duties. Online searches will only consider publicly available information relevant to the applicant's suitability to work with children. Searches will be conducted consistently for all shortlisted candidates for the same role.

Any information arising from references, online searches or other safeguarding due diligence that is relevant to the recruitment decision will be discussed, where appropriate, with the candidate during the recruitment process. A written record of any concerns, the discussion held, and the outcome will be retained with the recruitment records in accordance with the organisation's data retention and data protection procedures.

Interviews

An interviewing panel will have been convened by the appointment group. All members of the Recruitment Team and any other staff member assisting on the recruitment process and/or interviews **MUST** have undertaken safer recruitment training. The interview panel will use structured, safeguarding-focused questions; probe gaps/moves; record decisions.

Conditional offer & pre-appointment checks

Any offer of employment/work will be made subject to the satisfactory completion of pre-employment checks. The chair of the interviewing panel will ensure that the following actions are pursued:

- **Identity** - Verify the candidate's identity - photographic ID and proof of address should be seen except where, for exceptional reasons, none is available - the DBS requires that a person's identity has been properly verified for the purposes of an application for an Enhanced criminal records check.
- **Enhanced DBS** - (with children's barred list where the role is regulated activity). All New Way Tuition staff are required to have an Enhanced DBS that is registered on the update service. The update Service is checked daily for changes and new information on the DBS.

- **Two proofs of address** – Dated within the last 3 months
- **Right to work in the UK** - (manual documents or the Home Office online service; British/Irish passports are checked via a certified IDSP, Credas).
- **Prohibition from teaching** - (via DfE 'Check a teacher's record').
- **Section 128** – for applicants of management roles.
- **Qualifications** – checked as required for the role.
- **Name changes** - Evidence of Name changes are required where possible, eg Marriage Certificate
- **Medical fitness** - A medical declaration may be requested following a conditional offer to determine whether the individual has the physical and mental capacity to undertake the role, in accordance with the Equality Act 2010.
- **Overseas Police Check** - Lived or worked outside the UK - overseas checks will be required (overseas criminal record checks, certificate of good conduct and professional standing check for teachers where available.
- **Childcare Disqualification** – checks required where necessary for those working in early years.
- **References** -Two references. A reference from the candidates most recent employment must be obtained and (if this is not education based) if the candidate has worked with children then a reference for their last position working with children must be acquired.

Starting before the DBS returns (Exceptional)

The above checks will be completed before a person takes up a position. An enhanced disclosure must be obtained before, or as soon as practicable after, appointment. Pending arrival of an enhanced disclosure, the proprietor of the organisation has the discretion to employ/offer work to the person with appropriate Risk assessments and safeguards, provided those safeguards (e.g. supervision) are clearly stated, the postholder is informed of the safeguards and they are reviewed at fortnightly intervals. A note must be placed on the SCR to this effect.

References will always be sought prior to appointment. KCSIE (Sept 2026) states that: "The purpose of seeking references is to allow employers to obtain factual information to support appointment decisions. Schools and colleges should obtain references before interview, where possible, this allows any concerns raised to be explored further with the referee and taken up with the candidate at interview."

Two references will be taken up, ideally before interview, including a request for any reason why the applicant should not be employed for work with children. If a reference is taken over the telephone, detailed notes will be taken, dated and signed. A subsequent hard copy will also be requested. References will be read on receipt to check that all specific questions have been answered satisfactorily, with appropriate follow-up where required. References not received in good time before appointment will be chased by telephone and alternative referees sought if needed.

References sent by email should come from a business account. If the provider does not have access to a business account and uses a personal 'server' (e.g., they may be retired), then telephone calls will be made to ascertain the legitimacy of the provider and the reference.

Where there have been gaps in an applicant's employment history, the appointing panel must satisfy themselves, either through references or at interview, that the reason(s) for those gaps is / are legitimate.

Should a reference (or references) arrive after the interview and indicate gaps in service or any other issue that requires further interrogation, then a member of the interviewing panel will meet with the potential appointee to seek confirmation regarding their suitability for appointment.

All posts will be offered initially on a probationary period. If there are any concerns, particularly of any threat to students' welfare or safety, then employment may be terminated in accordance with contractual terms and safeguarding procedures. If the probationary period is successfully completed, then the employee/worker will continue as a temporary worker. Were there subsequently to be concerns re practice, they would be dealt with through New Way Tuition's identified processes (see 'Safeguarding', Whistleblowing' and 'Allegations of Abuse against Staff' policies).

Staff Induction

All newly appointed staff, trustees, volunteers and regular contractors who will have contact with children will receive an appropriate safeguarding induction before, or as soon as practicable after, commencing their role.

The induction programme will ensure that individuals understand their safeguarding responsibilities and are familiar with the policies, procedures and expectations of New Way Tuition Ltd.

As part of induction, individuals will receive and be required to read or complete training on:

- Keeping Children Safe in Education (KCSIE) Part One (or Annex A where appropriate to the role).
- The New Way Tuition Ltd Safeguarding and Child Protection Policy.
- The Staff Code of Conduct.
- The Behaviour Policy (where applicable).
- The organisation's Whistleblowing Policy.
- Online safety and the acceptable use of technology.
- The Prevent Duty and the identification and reporting of concerns relating to radicalisation and extremism.

- The identity and contact details of the Designated Safeguarding Lead (DSL) and any Deputy DSLs.
- Procedures for reporting safeguarding concerns, allegations against adults working with children, and concerns about the conduct of colleagues.
- Health and safety procedures, emergency arrangements and any role-specific safeguarding responsibilities.

Where staff begin work before the return of an Enhanced DBS certificate in exceptional circumstances, they will receive enhanced supervision and any additional safeguards identified through the organisational risk assessment until all recruitment vetting checks have been satisfactorily completed.

Completion of induction will be recorded, and staff will be expected to participate in ongoing safeguarding training, regular updates and refresher training throughout their employment to ensure their knowledge remains current and compliant with statutory guidance.

New Way Tuition will refer anyone who has harmed or is considered to pose a risk of harm to a child and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left, to the DBS. "The legal duty to refer applies equally in circumstances where an individual is deployed to another area of work that is not regulated activity, or they are suspended" (KCSIE Sept 2026).

Staff in a management position will be checked to ensure that they are not barred from holding a management position. The regulations state that this applies to:

- headteachers,
- staff on the leadership team (including non-teaching staff)
- teaching posts with departmental headship.

Checks will be made on the full SLT (senior leadership team) of New Way Tuition.

Procedures for volunteers:

New Way Tuition understands that it is not allowed to check supervised volunteers against the barred list, and that there is no duty for an enhanced criminal records check to be obtained, although a coordinator may take the decision that it is prudent to seek such a check. Given the nature of the New Way Tuition student cohort we will always seek an Enhanced DBS check. The barred list check will also be requested for volunteers in regulated activity.

The Designated Safeguarding Lead (or a member of staff to whom that responsibility is delegated) will undertake a risk assessment and utilise her/his professional judgement and experience to decide whether further checks should be sought in the case of all volunteers.

In reaching that decision s/he should consider:

- the nature of the work with children;
- what the establishment knows about the volunteer including formal or informal information offered by staff, parents and other volunteers;
- whether the volunteer has other employment or undertakes voluntary activities where referees can advise on suitability.

If a volunteer is to work in regulated activity, then the coordinator must decide what supervision is required. The person carrying out such supervision must:

- be in regulated activity themselves;
- provide that supervision regularly on a 'day to day' basis.

The coordinator must assure her/himself that the level of supervision is, "reasonable in all the circumstances to ensure the protection of children" (KCSIE Sept 2026).

Volunteers receive safeguarding induction appropriate to their role before working with children.

Any instances where students are to be supervised by staff from another organisation:

In any such circumstance the DSL will seek proof from the other organisation, be that school or other agency, that appropriate checks have been sought regarding any staff supervising regulated activity.

If any centre uses another 'provider' (e.g. activity centre, stables, gymnasium) written confirmation must be sought and received and filed from that provider confirming that all staff have been appropriately checked.

New Way Tuition is fully aware that we always remain responsible for the safeguarding arrangements for our students, regardless of whether we place them with other organisations for any period of time.

Staff subject to TUPE arrangements:

If staff are transferred under TUPE and there is either no gap in employment, or a gap of less than three months, and all information is complete, then information will be passed to the new Company/employer and a note made on the SCR that details have been accepted under TUPE.

Contractors working on any site:

All contractors will be subject to identity checks upon arrival and will require an up to date Enhanced DBS, if their work is regular and in a specified place with opportunity for

contact. If contractors are working on site where New Way Tuition students are in attendance and they do not have a DBS check, appropriate risk assessments will be carried out and assurances sought

from the employer that the contractors pose no threat to the safety of students. All efforts will be made to ensure that contact with students is kept to an absolute minimum and that students are made aware of their own responsibilities to pursue 'safe behaviour'. Should there be any concern whatsoever regarding the behaviour of a contractor (in terms of their engagement with students), then that person will be asked to leave the site immediately and the employer asked to provide different personnel to complete the work programme.

Agency and Supply Staff

New Way Tuition Ltd does not routinely engage agency or supply staff. Should this change, the organisation will obtain written confirmation from the supplying agency that all statutory pre-employment and safeguarding checks have been completed before the individual commences work. This will include an Enhanced DBS check and a Children's Barred List check where the role involves regulated activity, together with any other checks required by Keeping Children Safe in Education.

Alternative Provision

Where a school places a pupil with us, the school remains responsible for that child's safeguarding. We will provide written assurance of our safer-recruitment checks and cooperate with any safeguarding due diligence required by the placing school or local authority. [GOV.UK](https://www.gov.uk)

THE SINGLE CENTRAL REGISTER – THE LEGAL REQUIREMENTS

Schools must keep a single central record, so they have evidence to demonstrate to inspectors that they have carried out the range of checks required by the law. A copy of the documents used to verify the successful candidate's identity, right to work and required qualifications will be kept within a file that is maintained for that member of staff. Schools do not have to keep copies of vetting documents in order to fulfil the duty of maintaining the single central record.

An entry will be made for all current members of New Way Tuition, all staff, salaried trainees, the proprietor, and any individuals who work in regular contact with children including volunteers, supply staff and those employed as third parties (even for one day).

Included on the SCR:

- Full name
- Job title/role
- Work start date

- Identity check completed (including date)
- Right to work in the UK check completed (including date and method used)
- Enhanced DBS check completed (including date certificate obtained/seen)
- Children's Barred List check completed (where the role involves regulated activity)
- Prohibition from Teaching check completed (where applicable)
- Section 128 check completed (for management positions, trustees and proprietors where applicable)
- Verification of professional qualifications (where required for the role)
- Overseas criminal record checks and/or Certificate of Good Conduct completed (where applicable)
- Letter of Professional Standing for teachers who have worked overseas (where applicable)
- Childcare Disqualification declaration/check completed (where applicable)
- Date each check was completed
- Name or initials of the person who completed or verified each check
- Record of safeguarding training completed

The Single Central Record will be maintained electronically and reviewed regularly by the Designated Safeguarding Lead (DSL) and/or Director to ensure that all statutory safer recruitment checks are complete, accurate and up to date. Regular audits will be undertaken, and any discrepancies will be addressed without delay. Copies of documents will only be retained where there is a lawful basis to do so and in accordance with the Data Protection Act 2018 and UK GDPR.

Data Protection

We may retain a copy of documents only where necessary and unless there is a lawful reason to retain them for longer, for **no longer than 6 months**; we retain a record that vetting was carried out, the result, and the recruitment decision.

Recruitment Record Keeping

Records relating to recruitment and selection will be retained in accordance with the Data Protection Act 2018, UK GDPR and the organisation's Retention Schedule. Unsuccessful candidate records will normally be retained for six months before secure destruction unless there is a lawful reason to retain them for longer.

EX-OFFENDERS

As an organisation using the Disclosure and Barring Service (DBS) to assess applicants' suitability for positions of trust, we comply fully with the DBS Code of Practice and undertake to treat all applicants fairly. We will not discriminate unfairly against any individual based on a conviction, caution, reprimand, or other information revealed.

We actively promote equality of opportunity for all and select candidates for interview based on their skills, qualifications, and experience.

All roles within this Alternative Provision are exempt from the Rehabilitation of Offenders Act 1974 (Exceptions Order 1975). Applicants are therefore required to disclose all spent and unspent convictions, cautions, warnings, and reprimands that are not protected.

A disclosure of a criminal record will not automatically prevent an applicant from being appointed. The relevance of any information to the role applied for will be carefully considered through a formal risk assessment, in line with our safeguarding responsibilities and Keeping Children Safe in Education (2026).

Failure to declare information that is later revealed by DBS or other safeguarding checks may lead to withdrawal of an offer of work or removal/dismissal.

All disclosure information will be treated in the strictest confidence and in accordance with data protection legislation.

MODERN SLAVERY STATEMENT

New Way Tuition Ltd acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. New Way Tuition Ltd understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

New Way Tuition Ltd does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided New Way Tuition Ltd in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. New Way Tuition Ltd strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom.

Ongoing Safeguarding and Suitability

Safer recruitment is an ongoing process and does not end once an individual has been appointed. New Way Tuition Ltd is committed to maintaining a culture of vigilance and ensuring that all staff, trustees, volunteers and contractors continue to be suitable to work with children throughout their engagement with the organisation.

All staff are expected to uphold the highest standards of professional conduct and to act in accordance with the organisation's Safeguarding and Child Protection Policy, Staff Code of Conduct and all relevant safeguarding procedures.

New Way Tuition Ltd will:

- Ensure all staff receive regular safeguarding and child protection training and updates in accordance with statutory guidance.
- Provide annual safeguarding updates and additional training where changes to legislation, guidance or organisational procedures occur.
- Maintain an accurate and up-to-date Single Central Record (SCR) and ensure statutory checks remain appropriately recorded.
- Monitor DBS Update Service subscriptions and undertake status checks in accordance with organisational procedures.
- Require all staff to disclose, without delay, any cautions, convictions, criminal investigations, professional sanctions, or circumstances that may affect their suitability to work with children.
- Encourage staff to report any safeguarding concerns regarding colleagues through the organisation's Whistleblowing Policy or Low-Level Concerns procedures where appropriate.
- Ensure concerns relating to staff conduct or suitability are managed promptly and fairly in accordance with the Allegations Against Staff Policy and relevant statutory guidance.
- Provide appropriate supervision, support and performance management to promote safe professional practice.
- Review safeguarding responsibilities as part of regular supervision, appraisal and quality assurance processes.

Where concerns arise regarding an individual's suitability to work with children, New Way Tuition Ltd will undertake a risk assessment and take appropriate action, which may include additional supervision, suspension, referral to the Local Authority Designated Officer (LADO), referral to the Disclosure and Barring Service (DBS), referral to any relevant professional regulatory body, or termination of employment where appropriate.

Monitoring and Continuous Improvement

The Managing Director and Designated Safeguarding Lead will monitor safer recruitment practice through:

- recruitment file audits;
- Single Central Record audits;
- induction records;
- safeguarding audits;
- staff training records;

- lessons learned from recruitment activity;
- policy review following legislative changes.

Findings from monitoring will be used to strengthen recruitment practice and safeguarding arrangements.

Everyone working within New Way Tuition Ltd shares responsibility for safeguarding children and promoting their welfare. Maintaining a safe culture requires continual vigilance, openness, accountability and a commitment to acting in the best interests of every child.