Meadow Pathways Wellbeing and Education Cornwall (MPWEC)

Safer Recruitment Policy

Education other than at School (EOTAS)

Responsibility to update: Zoe Waitz and Michelle Pascoe
Applies to: All staff, contractors, volunteers and visiting professionals working with children and young people (CYP) engaged in Meadow Pathways EOTAS packages (including tuition in homes, community venues and online).

Version No: 3
Date: September 2026
Review Date: September 2027

Summary of Changes – September 2026 Review

This policy has been reviewed and updated in September 2026 to reflect Keeping Children Safe in Education (KCSIE) 2026 (in force from 1 September 2026), Working Together to Safeguard Children 2026 (in force from 18 March 2026), the Crime and Policing Act 2026, and the DfE's voluntary national standards for non-school alternative provision. Key changes made at this review:

- All references updated from KCSIE 2025 and Working Together to Safeguard Children 2023 to the September 2026 and March 2026 editions.
- The Crime and Policing Act 2026 removes the previous "supervision exemption": a volunteer or self-employed practitioner who teaches, trains, instructs or supervises children on 3 or more days in a 30-day period, or overnight, is now carrying out regulated activity and requires an enhanced DBS check with children's barred list check, regardless of whether another checked adult is present. Section 12 has been updated accordingly.
- Added a Section 128 direction check and a check that no proprietor/director is subject to a teaching prohibition order, reflecting the DfE's voluntary national standards for non-school alternative provision.
- Added that DBS certificates obtained via an agency/umbrella body for supply or sessional staff must be no more than three months old, and that the SCR records this.
- Added a Public Sector Equality Duty (PSED) consideration where a referral to a professional regulator (e.g. the Teaching Regulation Agency) is being considered.
- Clarified that allegations against trainee/student placements are handled on the same basis as those against supply staff and contractors.
- **Version 3 (September 2026):** added online searches of shortlisted candidates (KCSIE 2026); clarified that references are sought before interview; Section 11 updated so that allegations of harm go to the LADO within one working day, while low-level concerns go to the DSL.

This summary is provided for ease of reference; the changes are reflected throughout the policy below.

1. Policy Statement

Meadow Pathways Wellbeing & Education Cornwall is committed to safeguarding and promoting the welfare of children and young people. Safer recruitment is a fundamental part of our safeguarding culture and ensures that all individuals working with EOTAS pupils are suitable, safe, and appropriately vetted.

This policy aligns with Keeping Children Safe in Education (KCSIE) 2026, Working Together to Safeguard Children (2026), and relevant UK legislation. We recognise that children accessing EOTAS may be particularly vulnerable due to trauma, SEND, SEMH needs, or disrupted education, and we take additional care to ensure their safety.

2. Legal and Statutory Framework

This policy is informed by:

- Keeping Children Safe in Education (KCSIE) 2026
- Working Together to Safeguard Children (2026)

- Education Act 2002 (Section 175)
- Safeguarding Vulnerable Groups Act 2006, as amended by the Crime and Policing Act 2026
- Equality Act 2010
- Rehabilitation of Offenders Act 1974 (Exceptions Order 1975)
- Data Protection Act 2018 and UK GDPR
- Children and Families Act 2014
- DfE Voluntary National Standards for Non-School Alternative Provision (2025)

3. Scope

This policy applies to:

- Employees
- Self-employed practitioners
- Volunteers
- Students on placement
- Contractors or sessional workers
- Anyone engaged in regulated activity on behalf of Meadow Pathways

4. Principles of Safer Recruitment

We follow these core principles:

- Safeguarding is embedded throughout the recruitment process
- No appointment is made until all checks are complete
- All roles are assessed for eligibility for DBS and barred list checks
- Recruitment decisions are transparent, fair, and non-discriminatory
- All staff understand their safeguarding responsibilities from the outset
- Records are kept securely and in line with UK GDPR

5. Recruitment and Selection Process

5.1 Role Definition and Advertising

Every role includes:

- A clear job description
- A person specification
- A safeguarding statement setting out our commitment to safeguarding and the checks that will be carried out, including that online searches may be made of shortlisted candidates
- Required qualifications and experience
- Expectations for working with vulnerable children

5.2 Application Process

Applicants must provide:

- Full employment history with explanations for gaps
- Details of qualifications
- Two referees, including the most recent employer
- A declaration of criminal history (where legally permitted)

5.3 Shortlisting

Shortlisting is carried out using:

- Objective criteria
- Safeguarding-focused scrutiny
- Consideration of unexplained gaps or anomalies

Any concerns identified at this stage are explored during interview.

5.4 Online Searches

In line with KCSIE 2026, Meadow Pathways carries out an online search of shortlisted candidates as part of due diligence, to identify any incidents or issues that are publicly available and may need to be explored at interview. Shortlisted candidates are told in advance that this search will take place. Searches are proportionate, focus on suitability to work with children, and any findings are discussed with the candidate before a decision is made.

5.5 References

References are requested for all shortlisted candidates and, wherever possible, received and checked before interview so that any concerns can be explored. Open references or testimonials are not accepted.

6. Interviews

Interviews include:

- Questions assessing suitability to work with vulnerable children
- Exploration of safeguarding knowledge
- Discussion of employment history and gaps
- Verification of identity and right to work

Where appropriate, interviews may include scenario-based safeguarding questions.

7. Pre-Appointment Checks

No individual begins work until all required checks are completed.

7.1 Identity Verification

- Original documents checked in person or via certified digital verification
- Address and photo ID confirmed

7.2 Right to Work in the UK

- Verified in line with Home Office guidance

7.3 Enhanced DBS Check with Children's Barred List

Required for all roles involving regulated activity. DBS checks include:

- Enhanced criminal record check
- Children's barred list check
- Overseas criminal record checks where applicable

7.4 References

- Two references obtained, including most recent employer
- References verified verbally where needed
- Any safeguarding concerns explored before appointment

7.5 Qualifications and Professional Registration

- Certificates checked
- Professional memberships verified where relevant

7.6 Employment History

- Full chronology reviewed
- Gaps explored and documented

7.7 Self-Disclosure

Applicants must disclose:

- Relevant criminal history
- Disqualification under the Childcare Disqualification Regulations (if applicable)
- Any safeguarding concerns or investigations

8. Single Central Record (SCR)

Meadow Pathways maintains a secure Single Central Record containing:

- Identity checks
- DBS details
- Barred list checks
- Right to work
- Qualifications
- References
- Online search completed (date)
- Safeguarding training dates
- Start dates and role details
- Section 128 direction checks and teaching prohibition order checks, and confirmation that Directors/proprietors have themselves completed an enhanced DBS check with children's barred list check

The SCR is available for inspection by commissioning schools or the Local Authority.

9. Induction and Training

All new staff receive:

- Safeguarding induction aligned with KCSIE 2026
- Code of conduct and safer working practice guidance
- Lone working procedures
- Online safety procedures, including for online sessions
- Information on reporting concerns
- Training in trauma-informed and neurodiversity-affirming practice
- Ongoing supervision and reflective practice

10. Ongoing Suitability

We ensure continued suitability through:

- Annual DBS update checks (or subscription to the Update Service)
- Regular safeguarding training
- Supervision and performance reviews
- Monitoring of conduct, boundaries, and professional behaviour
- Immediate action if concerns arise

11. Allegations and Concerns About Staff

Any allegation or concern about a member of staff is managed in line with:

- KCSIE 2026 Part 4
- Local Authority Designated Officer (LADO) procedures
- Working Together to Safeguard Children 2026
- Our Safeguarding and Child Protection Policy

Allegations of harm – where someone may have harmed a child, committed a criminal offence against a child, behaved in a way that indicates they may pose a risk to children, or may not be suitable to work with children – are reported to the DSL immediately. The DSL refers to the LADO (01872 326536, lado@cornwall.gov.uk) within one working day and informs the commissioning school's DSL. If the allegation is about the DSL, it is reported to the Deputy DSL and the LADO.

Low-level concerns – behaviour that does not meet this threshold, such as a breach of professional boundaries – are reported to the DSL using the Low Level Concern Form, recorded and reviewed for patterns. They are not referred to the LADO unless they meet the threshold above or a pattern emerges that does.

Where a referral to a professional regulator (e.g. the Teaching Regulation Agency) is being considered, Meadow Pathways has due regard to the Public Sector Equality Duty, including the potential impact of a referral on individuals sharing a protected characteristic.

12. Volunteers and Contractors

Volunteers and contractors undergo:

- Risk-based assessment of role
- DBS checks where required
- Safeguarding induction
- Supervision appropriate to their role
- Following the Crime and Policing Act 2026, the previous "supervision exemption" no longer applies: a volunteer, self-employed practitioner or contractor who teaches, trains, instructs or supervises children on 3 or more days in any 30-day period, or overnight, is carrying out regulated activity in its own right and must have an enhanced DBS check with children's barred list check before starting – whether or not a DBS-checked member of staff is also present.
- Where a volunteer or contractor already works for another organisation, Meadow Pathways may liaise with that organisation to agree who is best placed to obtain the necessary checks, but remains responsible for confirming a valid, in-date check is held before the person works unsupervised with EOTAS pupils.

13. Record Keeping and Data Protection

All recruitment records are:

- Stored securely
- Retained in line with statutory guidance
- Processed lawfully under UK GDPR
- Accessible only to authorised personnel

14. Policy Review

This policy is reviewed annually or sooner if:

- Legislation changes
- KCSIE is updated
- Safer recruitment guidance changes
- A safeguarding incident requires policy revision