

SOPHYRA TUTORS LTD

# Safer Recruitment Policy

*Applies to: all tutors accepted onto the Sophyra Tutors platform and anyone involved in tutor onboarding.*

## Document control

<b>Document title</b>	Safer Recruitment Policy
<b>Organisation</b>	Sophyra Tutors Ltd
<b>Owner</b>	Designated Safeguarding Lead (DSL) / Onboarding Lead
<b>Version</b>	1.0
<b>Effective date</b>	February 2026
<b>Next review date</b>	February 2027 (or sooner following a material change in law, guidance or operations)

## 1. Purpose

Sophyra Tutors Ltd is committed to safeguarding and promoting the welfare of children and young people. This policy sets out our safer recruitment and vetting practices to reduce the risk of harm and to ensure that all tutors accepted onto the Sophyra Tutors platform are suitable for online 1:1 work with students, including those under 18.

Sophyra Tutors is an online tutoring marketplace. All tutors are independent freelance professionals who hold a Sophyra Tutors Freelance Agreement. They are not employees of the company. This policy applies to the onboarding and ongoing oversight of all tutors, regardless of their location.

## 2. Scope

- All tutors accepted onto the Sophyra Tutors platform.
- Anyone involved in tutor onboarding, vetting or oversight on behalf of Sophyra Tutors.
- All tutor records and vetting documentation held by Sophyra Tutors.

## 3. Principles and framework

Our baseline safer recruitment approach aligns with recognised UK safer recruitment expectations for organisations working with children online. We apply the highest practicable standard that is lawful in the relevant jurisdiction.

- UK safer recruitment expectations (including KCSIE Part 3 as a reference standard for online provision).
- Working Together to Safeguard Children (UK Government guidance).
- UK GDPR and the Data Protection Act 2018, including requirements for processing applicant data and vetting information.
- ICO registration: ZC045375.

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

#### 4. Roles and responsibilities

- Designated Safeguarding Lead (DSL) and Onboarding Lead: responsible for ensuring all checks are completed, recorded and reviewed before any tutor delivers sessions to students under 18.
- Safeguarding contact: [safeguarding@sophyra.org](mailto:safeguarding@sophyra.org) (confidential inbox, monitored by the DSL).
- At least one person involved in tutor onboarding holds current safer recruitment training.

No tutor may deliver sessions to a student under 18 until all required checks have been completed and recorded.

#### 5. Onboarding and selection process

1. Define the tutoring scope and safeguarding exposure (subjects, age group, session platform).
2. Communicate Sophyra Tutors' commitment to safeguarding and safer recruitment clearly in all tutor-facing materials.
3. Collect tutor application information including full professional history and explanations for any gaps.
4. Assess applications using objective criteria, with safeguarding suitability as a non-negotiable threshold.
5. Conduct a structured onboarding conversation including safeguarding awareness and professional boundaries.
6. Verify identity and qualifications before any offer is confirmed.
7. Offer of placement on the platform is conditional on satisfactory completion of all required checks.
8. No tutor is accepted onto the platform until all checks are complete and recorded.

#### 6. Pre-onboarding checks

Checks are proportionate to role risk and local legal requirements. As a minimum, Sophyra Tutors completes and records the following before any tutor is accepted onto the platform:

- Identity verification.
- Qualification and professional status verification (teaching qualifications, subject credentials).
- A minimum of two professional references, verified before onboarding is confirmed. References must address the tutor's suitability for working with young people and their conduct and professional boundaries.
- Professional history review, including explanations for any gaps.
- Criminal record check: enhanced DBS check for UK-based tutors, or an equivalent police check issued by the relevant authority for tutors based outside the UK. Checks are refreshed on a regular cycle and kept under review.
- Completion of mandatory safeguarding training as specified by the DSL.
- Signed Sophyra Tutors Freelance Agreement, which incorporates the Safeguarding Policy and Code of Conduct by reference.

Evidence of checks is held securely and can be provided to parents, guardians or statutory authorities on request, subject to lawful and proportionate sharing.

## 7. Ongoing suitability

- Tutors are required to notify Sophyra Tutors immediately if their criminal record status changes or if any safeguarding concern arises in any professional context.
- Safeguarding training is refreshed at the frequency specified by the DSL and at minimum annually.
- Sophyra Tutors conducts periodic reviews to confirm that all active tutors remain compliant with the vetting requirements of this policy.
- Concerns about a tutor's conduct, suitability or professional boundaries are escalated to the DSL immediately and managed under the Safeguarding and Child Protection Policy.

## 8. Central record of checks

Sophyra Tutors maintains an internal record of vetting checks for all tutors on the platform. This record is held securely with restricted access.

### Minimum fields:

- Name; subjects; engagement type (freelance); platform start date.
- Identity check date and outcome.
- Qualification and professional status verification date and outcome.
- References: dates received, referees, outcome and any safeguarding-related disclosures.
- Professional history review (completed: yes/no).
- Criminal record check type (DBS/police check), issuing authority, date and outcome. Do not record excessive detail beyond suitability outcome.
- Safeguarding training completed (date and provider).
- Freelance Agreement signed (date).

## 9. Allegations and concerns

Any allegation or concern about a tutor's conduct in relation to a student is managed under the Sophyra Tutors Safeguarding and Child Protection Policy. A tutor may be suspended from the platform while enquiries take place. Sophyra Tutors will cooperate fully with any statutory investigation.

## 10. GDPR and information governance

- Recruitment and vetting data is processed lawfully and transparently in accordance with UK GDPR and the Data Protection Act 2018.
- Access to vetting records is restricted to those involved in onboarding and safeguarding oversight.
- Vetting evidence is stored securely and retained only as long as necessary for the recruitment purpose and applicable legal obligations.
- We do not share vetting information beyond what is necessary and lawful.

## 11. Review

This policy is reviewed annually and after any significant safeguarding incident or material change in law or guidance. Next scheduled review: February 2027.

## Appendix A: Onboarding conversation prompts (examples)

- How do you maintain professional boundaries when teaching young people online?
- What would you do if a student disclosed a safeguarding concern to you during a session?
- How do you handle confidential student information and protect personal data?
- What does safeguarding mean in your role as an online tutor, and what are your responsibilities?
- Describe a situation where you had to act on a concern about a student's wellbeing.