

Last updated: 25th September 2025

1 Introduction

- 1.1 Bright Heart Education Ltd (company number 11179043) of 20-22 Wenlock Road, London, N1 7GU ("**Bright Heart**") is an employment business (as defined in the *Employment Agencies Act 1973*) which requires tutors representing it to provide tuition to students in a congenial and safe environment.
- 1.2 Bright Heart has a moral and legal obligation to ensure that, when given responsibility for young people and vulnerable adults, they are treated with the highest possible standard of care.
- 1.3 Bright Heart's Safer Recruitment Policy (the "**Policy**") aims to ensure that unsuitable candidates are deterred from applying to work with Bright Heart's students, and should they apply, they will not be successful in their application.
- 1.4 Our recruitment and selection procedures aim to hire the most suitable candidates as tutors, with all applicants receiving fair and equitable treatment during the recruitment process.
- 1.5 Bright Heart is committed to providing the best possible care to its students and vulnerable adults and to safeguarding and promoting the welfare of children and young people.
- 1.6 The Policy adheres to relevant employment law practice and other legislation and incorporates statutory guidance for schools and colleges contained in *Keeping children safe in education 2025, Part three: Safer recruitment (1st September 2025)* where relevant to Bright Heart.
- 1.7 Potential candidates should note that it is an offence in accordance with Section 7(1)(a) of the *Safeguarding Vulnerable Groups Act 2006* to apply for a role as a tutor working with children if the applicant is barred from engaging in regulated activity relevant to children.
- 1.8 Safer recruitment is acknowledged as our first line of defence in the safeguarding of children and young people.

- 1.9 The Policy sets out the values, principles and policies underpinning Bright Heart's approach to recruitment and selection of its tutors.
- 1.10 All Bright Heart staff involved in the recruitment process receive third-party safer recruitment training, and must fully adhere to this Policy.
- 1.11 **Simon McQueen**, Co-founder & Director, is Bright Heart's **Executive Lead for Safer Recruitment**. He last completed third-party safer recruitment training on 3rd April 2024, which is due for renewal by 3rd April 2027.
- 1.12 **Geraldine Arnott**, Tutor Manager, is Bright Heart's **Operational Lead for Safer Recruitment**. She last completed third-party safer recruitment training on 26th September 2024, which is due for renewal by 26th September 2027.

2 Equal opportunities

- 2.1 Bright Heart follows an equal opportunities policy and wishes to recruit and employ those people who are best suited for the vacancies for which they have applied, regardless of sex, sexual orientation, religion and belief, race, disability, pregnancy and maternity, age, gender, gender reassignment, marriage and civil partnership.
- 2.2 Bright Heart is committed to complying with the *Human Rights Act 1998*, as applicable, and the *Equality Act 2010*, including the guidance issued by the Government Equalities Office (GEO) <https://www.gov.uk/government/organisations/government-equalities-office> giving specific exclusions regarding pre-employment health questions.

3 Job advertisements

- 3.1 Bright Heart posts tutoring vacancies on job internet platforms such as Indeed and TES. These posts typically run from 2 weeks to around a month, ensuring that Bright Heart benefits from as wide a pool of

prospective candidates as possible.

- 3.2 These adverts outline the expectations and requirements for the tutoring role, including needing a minimum of 12 months of relevant UK tutoring and/or teaching experience.
- 3.3 Adverts require candidates to submit a CV and strongly encourage candidates to submit a cover letter.
- 3.4 The adverts make clear that Bright Heart follows stringent screening, and pre-employment checks including:
 - 3.4.1 Holding a screening call, online interview, and in-person meeting;
 - 3.4.2 Ensuring that a candidate has a clean and current Enhanced DBS, with a check of the children's barred list; and
 - 3.4.3 Requiring candidates to provide at least 2 independent professional references and 1 independent parent reference.
- 3.5 The adverts include pre-screening questions, including whether the candidate has a clean and current enhanced DBS in place and the required experience and qualifications.
- 3.6 Adverts also include certain skills tests to assess applicants' communication skills.

4 Initial screening

- 4.1 Screening aims to determine if a candidate appears suitable to work with our students and thus be offered an interview.
- 4.2 Bright Heart reviews pre-screening questions, test results, CVs, and cover letters to determine whether a candidate meets the job requirements.
- 4.3 Bright Heart has a broadly gender-balanced workforce of tutors, and gender is not considered when hiring tutors.
- 4.4 Potentially suitable applicants are shortlisted and then initially

screened telephonically.

- 4.5 In addition to providing the applicant with information about potential roles and rates of pay, key questions covered in the screening call include:
 - 4.5.1 Their current role;
 - 4.5.2 Their motivation for applying for the particular role;
 - 4.5.3 Their tutoring and teaching experience;
 - 4.5.4 If they possess an Enhanced DBS;
 - 4.5.5 What subjects they wish to tutor;
 - 4.5.6 Their availability for tutoring;
 - 4.5.7 Their SEN and other relevant experience;
 - 4.5.8 Other relevant questions based on their CV or cover letter, such as understanding gaps, educational qualifications and whether they have the right to work in the UK; and
 - 4.5.9 An assessment of their communication skills, enthusiasm, and professionalism.
- 4.6 Screening call notes are recorded and saved to the candidate's folder.

5 Application for a tutoring role

- 5.1 Following the screening call, potentially suitable tutors are e-mailed a selection of current relevant tutoring roles that Bright Heart seeks to fill, which will include details about the student, location, scheduling requirements, experience and qualification requirements, and the pay rate for the assignment.
- 5.2 Applicants are asked to provide a short application for each role they are interested in. This includes a brief motivation for why the applicant believes they are well-suited to help and briefly details their relevant experience and availability.
- 5.3 Bright Heart then shortlists the most suitable applicants and proceeds

to the next stage of the recruitment process, being pre-interview checks.

6 Pre-interview checks

- 6.1 Short-listed candidates are offered an online interview with a Bright Heart director or education consultant, subject to the candidate first completing a formal request for information.
- 6.2 The information request requires the candidate to provide the following before the interview:
- 6.2.1 Details (work e-mail and phone number) for two professional references, noting that references must be work e-mails (no Gmail/Hotmail, etc.) and not from co-workers, but rather a line manager or higher (e.g. head teacher / head of department);
- 6.2.2 Details (e-mail and phone number) for a parent referee (tutoring or teaching);
- 6.2.3 Scans / pictures of relevant documents, including:
- Passport (i.e. right to work in the UK);
 - Enhanced DBS with check of the children's barred list and confirmation whether the applicant is on the update service;
 - Driving licence, utility bill (<3 months) or council tax statement (<12 months) (i.e. proof of address);
 - University and any post-graduate qualifications;
 - Any professional certifications, e.g. QTS;
 - If immigrating or returning to the UK (after living overseas) in the last 5 years, an overseas police check / equivalent DBS and, if taught overseas, a good conduct letter from the professional regulating authority; and
 - Any other documents that the applicant believes will be relevant to support their application.
- 6.2.4 If the applicant is a qualified teacher, they must provide the

following details:

- Teaching records from teaching portal, which include teaching qualifications, QTS certificate, and induction certificate;
 - Teacher Reference Number (TRN), noting that this can be obtained from: Find a lost teacher reference number (TRN) (education.gov.uk); and
 - Full Name (including middle names and any previous names).
- 6.2.5 Self-declaration of criminal records or information that would make the candidate unsuitable to work with children and written confirmation if there is nothing to disclose. Should there be anything potentially disclosable, candidates are requested to consult guidance on disclosing criminal records at [rehabilitation-of-offenders-guidance.pdf](#). Examples of things to disclose include (but are not limited to):
- A criminal history;
 - Included on the children's barred list;
 - Prohibited from teaching;
 - If known to the police and children's local authority social care; or
 - Any relevant overseas information.
- 6.2.6 In addition, candidates are requested to send an updated CV (if not already provided) that meets the following minimum requirements:
- A 10-year history (or if under 26 years old, history dating back to age 16), with dates for employers / educational institutions and a list of qualifications; and
 - Any gaps on the CV explained.
- 6.3 It is also disclosed to candidates that by proceeding to arrange an interview, Bright Heart will carry out certain online checks. These online checks include:

- 6.3.1 A Google search of the candidate and an investigation of any potentially concerning information;
- 6.3.2 A search of social media, including Facebook, LinkedIn and Instagram; and
- 6.3.3 These checks are proportionate, limited to publicly available information relevant to suitability to work with children, and compliant with GDPR and equality legislation.
- 6.4 Finally, the formal information request makes clear that candidates must sign a contract for services post-referencing after the interview (including confirmation that the information in the self-declaration is accurate), and Bright Heart's Safeguarding and Child Protection Policy. It also notes that applying to work for Bright Heart as a tutor is an offence if the candidate is barred from engaging in regulated activity relevant to children.
- 6.5 Bright Heart checks to ensure all requested information has been returned and any concerns are followed up on before agreeing to proceed with an interview.

7 Initial interview

- 7.1 Successfully screened candidates that complete the formal information request satisfactorily are then interviewed by a Bright Heart director or education consultant.
- 7.2 The interview process is designed to ensure that a candidate would be suitable for the role based on their qualifications and experience, that they understand their obligations in terms of safeguarding and child protection and take them seriously, and to identify potential concerns.
- 7.3 The online interview (and subsequent in-person meeting) enables Bright Heart to get to know its tutors more personally to make better matches to students.
- 7.4 During the interview, Bright Heart provides the candidate with:

- 7.4.1 An introduction to Bright Heart and its philosophy on education and tutoring, including guidance on the Bright Heart approach;
- 7.4.2 An outline of the key requirements of our Safeguarding and Child Protection Policy;
- 7.4.3 The expectations of Bright Heart regarding communication and conduct and a broad outline of the tutoring process;
- 7.4.4 A description of the training tutors must do as Bright Heart tutors, including nasen training, safeguarding induction training, and annual safeguarding refresher training; and
- 7.4.5 An explanation of the next steps in the process.
- 7.5 The candidate is asked a variety of questions to cover the objectives in Clauses 7.2 and 7.3, including:
 - 7.5.1 A review of their experience as outlined in their CV and a request for further references if references supplied do not cover key relevant recent roles;
 - 7.5.2 Scenarios for handling a particular type of student, to determine if they demonstrate the experience claimed in their CV;
 - 7.5.3 A discussion of any gaps in their CV;
 - 7.5.4 A review of their relevant qualifications;
 - 7.5.5 An assessment of their motivation for wanting to work with children in the particular role;
 - 7.5.6 If there are any disciplinary actions outstanding, or cautions, warnings or barrings; and
 - 7.5.7 If they are mentally and physically fit to perform the duties of a self-employed tutor.
- 7.6 In the interview, the candidate's responses are closely examined when questioned about how they tutor and work with students, especially those with special educational needs.
- 7.7 Interviews are conducted by one of Bright Heart's directors or

education consultants online using video communications software (Microsoft Teams), but subject to a final in-person meeting and document check.

- 7.8 Interview notes are recorded and saved to the candidate's folder.

8 Checks and references

- 8.1 Bright Heart carries out a number of pre-hiring checks for tutors shortlisted following the interview stage.
- 8.2 The following checks are performed:
- 8.2.1 A minimum of 2 professional written references, with the references to cover recent relevant jobs in the candidate's CV;
 - 8.2.2 A further tutoring/teaching reference from a parent;
 - 8.2.3 Original documentary evidence of relevant qualifications and professional certifications, for example, a QTS certificate;
 - 8.2.4 A current original DBS at enhanced level, with a check of the children's barred list. This must be less than 12 months old (unless on the update service, which Bright Heart will only check once it receives the applicant's permission following contracting); and
 - 8.2.5 A candidate's passport and if appropriate, a valid work permit. Where a candidate has immigrated or returned to the UK in the last 5 years, they will also need to provide references from their country of origin and a police check / DBS equivalent from their country of origin.
- 8.3 Bright Heart performs initial checks of the documents outlined in Clause 6.2 via scans sent via e-mail, with a final in-person check of documents taking place after contracting, but before a tutor is eligible to commence tutoring.
- 8.4 Reference checks include enquiring about any safeguarding concerns.
- 8.5 In addition, the shortlisted tutor is required to complete a tutor profile

on Bright Heart's tuition management system, which includes:

- 8.5.1 Address, phone number and a recent professional photograph;
 - 8.5.2 Teaching experience and bio;
 - 8.5.3 Teaching skills;
 - 8.5.4 Qualifications, professional certifications and academic institutions; and
 - 8.5.5 CV (up to date to incorporate latest tutoring/teaching experience).
- 8.6 Where a candidate does not have an enhanced DBS check in place, Bright Heart can process this on their behalf using a third-party provider, uCheck (the tutor is responsible for this cost). This is performed following contracting and is a requirement before any tuition can commence.

9 Contracting

- 9.1 Geraldine Arnott is responsible for performing a final check of a candidate's documents, information request responses, references, screening and interview notes, tutor tier and tutor profile to ensure that all safer recruitment checks outlined above have been carried out satisfactorily before contracting.
- 9.2 Simon McQueen reviews the checks carried out in Clause 9.1, and Geraldine discusses any concerns that arise with Simon.
- 9.3 A tutor's details and records of the pre-interview and safer recruitment checks carried out, and the dates of such checks, are recorded in Bright Heart's Tutor Database, which is Bright Heart's single central record (SCR) for safer recruitment.
- 9.4 Assuming this final check is in order, the following documents are then sent to the prospective tutor for their review:
- 9.4.1 A Key Information Document in accordance with *regulation 13A of the Conduct of Employment Agencies and Employment*

Businesses Regulations 2003;

- 9.4.2 A welcome letter providing a tutor with information on their tutor tier and the next steps, including signing documents and a final in-person meeting and document check;
 - 9.4.3 A contract for services;
 - 9.4.4 An illustrative example of Bright Heart's tutor incentive scheme;
 - 9.4.5 Safeguarding and Child Protection Policy;
 - 9.4.6 Online Tutoring Policy;
 - 9.4.7 Anti-bullying Policy;
 - 9.4.8 The tutor pack, containing detailed guidance on providing tuition safely, the Bright Heart approach, nasen training, Bright Heart tuition management system and providing online tuition safely;
 - 9.4.9 A high-level summary of the Bright Heart Approach to tutoring; and
 - 9.4.10 The School tutor pack, which is applicable for in-school tuition.
- 9.5 Candidates are required to sign the contract for services and the Safeguarding and Child Protection Policy (which references acceptance of the Online Tutoring and Anti-bullying Policy).
- 9.6 The contract for services requires the tutor to:
- 9.6.1 adhere to Bright Heart's various policies and procedures, including Bright Heart's Safeguarding and Child Protection Policy and Online Tutoring Policy and those outlined in the tutor pack;
 - 9.6.2 provide Bright Heart with a clean enhanced DBS with a check of the children's barred list that is no more than 12 months old (unless on the update service), and register for the DBS update service at the next available opportunity;
 - 9.6.3 give Bright Heart permission to check the DBS update service;
 - 9.6.4 provide Bright Heart with information about any criminal

history or anything that would make the tutor unsuitable to work with children, as well as previous or pending complaints, disciplinary procedures or investigations made against the tutor, and warrant that all information provided during the application process, including the self-declaration in Clause 6.2.5 is true and accurate;

- 9.6.5 give Bright Heart permission to carry out any checks that it deems necessary in connection with Clause 9.6.4 above, including, for qualified teachers, the Prohibited Teacher List database;
- 9.6.6 agree to undertake required induction tutor training and safeguarding training as well as annual safeguarding refresher training;
- 9.6.7 acknowledge that it is an offence in accordance with Section 7(1)(a) of the Safeguarding Vulnerable Groups Act 2006 to provide tuition if barred from engaging in regulated activity relevant to children; and
- 9.6.8 attest to being physically and mentally fit to provide tuition.

10 In-person final meeting, final checks and training

- 10.1 Candidates signing a contract for services and their Safeguarding and Child Protection Policy are invited to an in-person meeting with a Bright Heart staff member before commencing any tutoring.
- 10.2 This meeting comprises an informal chat over coffee and a document check of the original documents outlined in Clause 6.2.3.
- 10.3 For qualified teachers, Bright Heart checks the Prohibited Teacher List database and documents in its Tutor Database that this check has been satisfactorily completed (or terminates a tutor's contract if this check brings to light information that was withheld from Bright Heart in contravention of the contract for services).
- 10.4 Bright Heart flags tutors who have not completed an in-person check or

have an outstanding or expired DBS on its Tutor Database. Such tutors are not eligible to provide tutoring to any students.

- 10.5 Tutors must complete safeguarding induction training and submit and pass a test before commencing any tuition or within one month of signing their contract (if they have not commenced tutoring) as a condition of their contract for services. Tutors must also complete annual safeguarding refresher training and pass a related test.
- 10.6 Tutors must undertake induction tutor training (an online course produced exclusively for Bright Heart by nasen) and submit and pass a test within one month of signing their contract as a condition of their contract for services.
- 10.7 Tutors who have not satisfactorily completed induction tutor training, safeguarding induction training, or safeguarding refresher training are also flagged on the system as ineligible to provide tutoring.
- 10.8 Bright Heart schedules a welcome call during onboarding to confirm tutors understand key requirements (safeguarding reporting routes, online safety, and attendance escalation) and to answer questions.

11 Ongoing procedures

- 11.1 Bright Heart carefully monitors tuition and lesson reports and follows up with all clients following a tutor trial and periodically.
- 11.2 Any safeguarding or other concerns raised are escalated and discussed with the directors and any appropriate action is taken, including terminating a tutor's contract for services and ceasing to work with a tutor, or taking any further steps necessary as outlined in Bright Heart's Safeguarding and Child Protection Policy. This can include Bright Heart's Designated Safeguarding Lead (DSL), Carol Minkoulou, reporting findings of investigations to the Disclosure Barring Service and Prohibition from Teaching bodies.
- 11.3 Bright Heart arranges periodic in-person training workshops for tutors, with the last in-person training session being held on 25th January 2025.

- 11.4 In addition, Bright Heart arranges periodic online training sessions run by Bright Heart's senior education consultants, Carol Minkoulou, Dr Rosie Gillman, and Victoria Hopkins, who are all experienced, qualified teachers.
- 11.5 Bright Heart provides tutors with ongoing feedback about their performance, including from parents who are asked to review each tutor through its tuition management system after 9 hours of tutoring. In addition, Bright Heart has a formal process in place to review tutor performance and respond to any concerns that arise.
- 11.6 Bright Heart maintains an active dialogue with all tutors and sends tutors broadcasts via its tuition management system with important updates when required, for example, to update tutors on safeguarding or training.
- 11.7 Bright Heart directors and staff involved with recruitment receive safer recruitment training, which is updated as appropriate.

12 Conclusion

- 12.1 Bright Heart is committed to ensuring that when given responsibility for young people and vulnerable adults, they are treated with the highest possible standard of care.
- 12.2 Bright Heart will take all necessary steps to guard against working with tutors who are unsuitable to work with children or vulnerable adults, and will cease to work with tutors who do not meet its stringent tutoring standards.
- 12.3 This Policy is dated 25th September 2025 and will be reviewed and updated at least annually to ensure compliance with legislation and best practice.