



---

# SAFER RECRUITMENT POLICY

---

Bespoke Learning Ltd.

<b>Policy review date</b>	<b>Amendments</b>
07.08.2019	Policy created
08.12.2019	updated
05.01.2021	Updated with signposting to KCSIE
09.09.2022	Reference to safer recruitment training and update of self-declaration form which is associated with this policy
22.09.2023	Updates to: Statement of intent, Legal framework, Planning, advertising and shortlisting, and Online searches on shortlisted candidates.
07.09.24	Updates to: Legal Framework, shortlisting and online searches for shortlisted candidates and self-declaration form.
01.09.2025	Removal of the statement, 'Bespoke Learning Ltd. does not operate online. Pg3 Addition of the statement 'Bespoke Learning Ltd. will not accept open references.' Pg7
The next scheduled date for review is  01.09.26	
Person with responsibility for annual review	Dawn Griffiths, Director.

## Statement of Intent

This policy has been developed to embed safer recruitment practices and procedures within Bespoke Learning Ltd. and to assist with recruitment and employee selection. Its intention is to support the creation of a safer culture by reinforcing the safeguarding and well-being of children and young people in our care. This policy complies with guidance outlined in [Keeping Children Safe in Education, 1<sup>st</sup> September 2025 \(KCSIE\)](#).

The safety and protection of students is always at the forefront of Bespoke Learning Ltd.'s concerns, which is why this policy aims to embed a robust safeguarding culture into Bespoke Learning Ltd.'s recruitment practices.

This policy reinforces the expected conduct outlined in the Roles/Responsibilities document for teachers and in Bespoke Learning's Safeguarding and Child Protection policy. As well as the company's Whistle Blowing Policy with which all teachers are expected to be familiar with.

This policy is an essential element in creating and maintaining a safe and supportive environment for all young people and teachers. It aims to ensure both safe and fair recruitment and selection of all teachers and to:

- attract the best possible teachers to the role of home teacher
- deter unsuitable teachers
- identify and reject those teachers who are unsuitable to work with children and young people

## Legal framework

This policy has due regard to all relevant legislation including, but not limited to, the following:

- Rehabilitation of Offenders Act 1974
- Children Act 1989
- Education Act 2002
- Sexual Offences Act 2003
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- Education and Skills Act 2008
- The School Staffing (England) Regulations 2009
- Equality Act 2010
- The Education (School Teachers' Appraisal) (England) Regulations 2012 (as amended)
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Amendments to the Exceptions Order 1975, 2013 and 2020

This policy has due regard to guidance including, but not limited to, the following:

- DfE (2020) 'Governance handbook'
- DfE (2021) 'Staffing and employment advice for schools'
- DfE (2022) 'ID checking guidelines for standard/enhanced DBS check applications from 1 July 2021'
- DfE (2021) 'Right to work checks: employing EU, EEA and Swiss citizens'
- DfE (2024) 'Keeping children safe in education'
- DfE (2023) 'Recruit teachers from overseas'
- Disclosure & Barring Service (2018) 'Regulated activity with children in England'
- Home Office (2022) 'Employer's guide to right to work checks'
- Safer Recruitment Consortium (2022) 'Guidance for safer working practice for those working with children and young people in education settings'
  - DfE (2024) 'Recruit teachers from overseas'
  - Disclosure & Barring Service (2024) 'Regulated activity with children in England and Wales'
  - Home Office (2024) 'Employer's guide to right to work checks'

This policy operates in conjunction with the following Bespoke Learning Ltd. policies:

- Child Protection and Safeguarding Policy
- Complaints Procedures Policy
- Single Central Record (SCR) Policy

### **Bespoke Learning Ltd. does not:**

- use agency or third-party staff.
- engage volunteers in any capacity within the company.
- employ student teachers or unqualified teachers.
- allow student teachers to observe Bespoke Learning Ltd.'s work with students who are receiving alternative provision from Bespoke Learning Ltd.
- engage teachers in non-regulated activity therefore it is not necessary for new checks to be made on existing staff. Teachers of bespoke learning are appointed as teachers who carry out regulated activity and therefore have passed the checks outlined in this policy.
- carry out section 128 checks as its teachers do not carry out managerial roles.

Bespoke Learning Ltd is committed to using procedures that deal effectively with those adults who fail to comply with the company's Safeguarding and Child Protection procedures and practices. Dawn Griffiths, Director of Bespoke Learning Ltd. and DSL has a duty to refer any allegation of abuse to the

Designated Officer for the local authority (LADO) within one working day of the allegations being made. A referral will be made if a teacher has:

- behaved in a way that has or may have harmed a child.
- committed a criminal offence against or related to a child.
- behaved towards a child or children in a way that indicates he or she would pose a risk of harm if they work regularly or closely with children.

Bespoke Learning Ltd has a duty to refer to the Disclosure and Barring Service (DBS) a teacher of Bespoke Learning Ltd. who has been dismissed or resigns because of misconduct towards a young person following disciplinary investigation.

Dawn Griffiths, Director of Bespoke Learning Ltd. will:

- ensure that the company operates safe and fair recruitment and selection procedures which are regularly reviewed and updated to reflect any changes to legislation and statutory guidance.
- ensure that all appropriate checks have been carried out on teachers who are successful in securing work with Bespoke Learning Ltd as a teacher.
- promote the safety and well-being of children and young people at every stage of the process.

## **Application Process**

Applicants are reminded in the application form provided to them that it is an offence to apply for the role if they are barred from engaging in regulated activity relevant to children.

Bespoke Learning Ltd will use the application form to make clear that shortlisted candidates may be subject to online searches.

Advertisements for opportunities to home tutor students for Bespoke Learning Ltd. will include the following two statements:

1. 'Bespoke Learning Ltd is committed to safeguarding children and young people. All teachers in regulated activity are subject to appropriate vetting procedures and a satisfactory Disclosure and Barring Service Enhanced check. This post is exempt from the provision of the Rehabilitation of Offenders Act 1974 and the exceptions order 1975.'
2. 'Bespoke Learning will conduct online searches of shortlisted applicants. This check will be part of a safeguarding check, and the search will purely be based on whether an individual is suitable to work with children. As care must be taken to avoid unconscious bias and any risk of discrimination a person who will not be part of the recruitment process will conduct the search and will only share information if and when findings are relevant and of concern.'

Application forms will include the following two questions:

1. Do you have any unspent conditional cautions or convictions under the Rehabilitation of Offenders Act 1974? (Y/N)?

2 Do you have any adult cautions (simple or conditional) or spent convictions that are not protected as defined by the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (Amendment) (England and Wales) Order 2020? (Y/N)?

The two questions above replace the current question relating to a criminal offence.

Have you ever been convicted of a criminal offence which is not 'protected' YES/NO  
Advertisements for posts will make clear that teachers will be expected to promote fundamental British values.

Applicants must complete the application form in full and provide the following information:

- personal details, current and former names, current address and national
- National insurance number
- details of their present (or last) employment and reason for leaving
- full employment history, since leaving school, including education, employment and voluntary work and including reasons for any gaps in employment
- qualifications, the awarding body and date of award
- details of two referees/references (see below for further information)
- a statement of the personal qualities and experience that the applicant believes are relevant to their suitability for the post advertised and how they meet the person specification

Application forms must be signed and returned to Dawn Griffiths at [dgriffiths@bespokelearningltd.com](mailto:dgriffiths@bespokelearningltd.com)  
or

sent by post. The address is given in the application form. The envelope must be marked 'Confidential'. Applicants submitting the forms via email will be asked to sign the form if they are invited to an interview. CVs are not accepted.

### **Self-Declaration Form**

Only applicants who have been shortlisted will be sent a self-declaration form. Dawn Griffiths will ensure that application packs, where relevant, state that candidates must be willing to sign a self-declaration form to obtain information about staff disqualification, in line with the Childcare Act 2006. and asked to disclose any relevant information including:

- Information of any criminal offences committed.
- If they are known to the police and children's social care services.
- Whether they have been disqualified from providing childcare.
- Any relevant overseas information.
- Applicants will need to sign the declaration which confirms that the information they have provided is true. This must be done before the interview takes place if the self-declaration form has been emailed to Bespoke Learning Ltd. An electronic signature is not accepted.

### **Short Listing Applicants**

When shortlisting applicants, Bespoke Learning will:

- Assess whether there are any inconsistencies or gaps in the applicant's employment and consider the reasons given for them.
- Consider undertaking online searches, as necessary, and explore any further potential concerns.

Requests for further information from applicants will be replied to promptly. All applications will be replied to in writing notifying them as to whether they have been shortlisted or not.

Interviews will be arranged for the shortlisted applicants.

### **Online searches for shortlisted candidates**

In line with KCSIE, Bespoke Learning Ltd. will consider carrying out online searches on shortlisted candidates as part of its due diligence. Online searches solely aim to help identify any incidents or issues that have happened, and are publicly available online, that the school may want to explore with the applicant at interview.

Online searches will be conducted on shortlisted candidates only, by Dawn Griffiths, Director and only where Bespoke Learning Ltd. considers this appropriate. Dawn Griffiths will consider any potential risks of online searches, e.g. unlawful discrimination or invasion of privacy, and will ensure that searches are clear on the purpose of the search. Shortlisted candidates will be made aware that online searches may be conducted as part of due diligence checks.

Online searches will only examine data that is publicly available. Dawn Griffiths will not 'follow' or submit a friend request to shortlisted candidates on social media platforms to access further details or information.

Online searches will have due regard to Part three of KCSIE.

The online search process may include searching for the candidate by name via search engines and social media platforms.

When carrying out searches of shortlisted candidates' online presence, Dawn Griffiths will look out for indicators of concern, such as:

- Inappropriate behaviour, jokes or language.
- Discriminatory comments.
- Inappropriate images.
- Drug or alcohol misuse.
- Anything that suggests the candidate may not be suitable to work with children.
- Anything that could harm the reputation of Bespoke Learning Ltd.

Any concerns will be addressed during the interview process. Bespoke Learning Ltd. will ensure that candidates are given an opportunity to discuss any concerns raised by the online search.

### **Invitation to interview**

Before interview invitations are sent, Dawn Griffiths, Director of Bespoke Learning Ltd. will ensure that application packs are sent to short listed applicants and include the following:

- A copy of the advertisement
- A comprehensive job description
- A comprehensive person specification
- An equal opportunity statement
- An outline of the aims and values of Bespoke Learning Ltd.
- A self-declaration form

Dawn Griffiths will ensure that all shortlisted applicants receive information about the interview arrangements, how they will be conducted, the areas that will be explored and what documents they should bring to the interview.

## References

### Requesting references

References are requested prior to interview.

The following safeguarding procedures are in place: (These are in line with KCSIE 2022, point 223, page 54)

Bespoke Learning Ltd will:

- not accept open references e.g. to whom it may concern.
- not rely on applicants to obtain their own reference.
- ensure any references are from the applicant's current employer and have been completed by a senior person with appropriate authority (if the referee is school or college based, the reference should be confirmed by the headteacher/principal as accurate in respect of any disciplinary investigations).
- obtain verification of the individual's most recent relevant period of employment where the applicant is not currently employed.
- secure a reference from the relevant employer from the last time the applicant worked with children (if not currently working with children), if the applicant has never worked with children, then ensure a reference from their current employer.
- always verify any information with the person who provided the reference.
- ensure electronic references originate from a legitimate source.
- contact referees to clarify content where information is vague or insufficient information is provided.
- compare the information on the application form with that in the reference and take up any discrepancies with the applicant.
- establish the reason for the applicant leaving their current or most recent post, and ensure any concerns are resolved satisfactorily before appointment is confirmed.

### Checking references

Bespoke Learning Ltd. will not accept open references, e.g. 'To whom it may concern.' References will be checked upon receipt by the Director of Bespoke Learning Ltd, Dawn Griffiths to ensure that all questions have been answered satisfactorily and information is not contradictory or incomplete. The referees will be contacted to provide further clarification where appropriate, e.g. if some answers are vague or insufficient, or contradictory information has been provided. The reference will be compared for consistency with the information on the applicant's application form. Discrepancies between the reference and the application form will be discussed with the applicant at interview.

The DSL, Dawn Griffiths will ensure that any past disciplinary action or allegations disclosed as part of a reference are considered carefully when assessing the applicant's suitability for the role.

Where a reference appears incomplete or other concerns arise, Dawn Griffiths will carry out one of the following actions:

- Call the referee to discuss the reference further
- Email the referee for confirmation of its accuracy

### **Providing references**

- References will only be provided once written consent has been obtained from the person requesting a reference.
- The Director of Bespoke Learning Ltd. will provide a reference and will follow this policy's procedures and the prospective employer's requests as much as is reasonably possible, e.g. if a pro-forma is provided, she will complete the form. If the reference is not requested in a specific format, then she will decide the most appropriate method, e.g. a pro-forma or a letter-formatted reference.
- The Director of Bespoke Learning Ltd. will decide in exceptional circumstances if a reference cannot be provided or if certain questions asked by the prospective employer cannot be answered, seeking advice from the LADO and or seeking legal advice.
- Only Dawn Griffiths, Director of Bespoke Learning Ltd. will provide references for teachers on behalf of Bespoke Learning Ltd.
- Details of any capability procedures in the previous two years for a current or former teacher of Bespoke Learning Ltd. (including ex-headteacher) and the reasons for these, will be provided if requested.
- If, as part of a settlement agreement, Bespoke Learning has agreed to provide a reference for a teacher, Dawn Griffiths will ensure it is provided in line with the agreement and this policy. In circumstances where new evidence emerges that indicates information provided in the reference is incorrect, Dawn Griffiths will decide if the reference is to be changed or withdrawn, seeking legal advice sought where necessary, and she will notify the employee of any decision first.
- Dawn Griffiths will ensure that any information provided confirms whether she is satisfied with the applicant's suitability to work with children, and only provide the facts of any substantiated safeguarding concerns or allegations, including a group of low-level concerns about the same individual, that meet the harm threshold.
- Any repeated concerns or allegations which do not meet the harm threshold which have been found to be false, unfounded, unsubstantiated, or malicious will not be included in any reference.

### **Content of references**

Basic information will always be expected in references received and provided, e.g. skills, knowledge, duties undertaken, experience working with children, and personal characteristics, in addition to any information relating to safeguarding. Further relevant comments will be made as much as is reasonably possible in line with the employer's requests, provided they are verifiable and objective, e.g. through appraisals or attendance records.

References will contain only factual and verifiable information and will not include speculation, e.g. about a former employee's suitability for a job, or hearsay. Dawn Griffiths, Director of Bespoke Learning Ltd. will ensure all comments have a factual basis and that an impression is not given which is misleadingly positive or negative. Performance issues or concerns which have not been discussed or raised with the employee beforehand will not be mentioned.

## Previous disciplinary action

Dawn Griffiths, Director of Bespoke Learning Ltd. will ensure that any references requested by Bespoke Learning Ltd. include a section asking for any past disciplinary action or allegations to be disclosed. Any disclosures will be carefully considered when assessing the applicant's suitability for the role, in line with this policy.

Information from DBS checks will not be included in references provided by Bespoke Learning Ltd. Information regarding criminal offences from other sources will not be included unless appropriate advice has been sought.

When providing references, the disclosure of information about past disciplinary action or allegations not relating to safeguarding will be provided where it is deemed appropriate, e.g. it is relevant to the teacher or former teacher's suitability for the role. Information relating to disciplinary action will generally only be disclosed if penalties or sanctions remain in place for the employee.

Allegations which were proven to be false, unsubstantiated or malicious, e.g. relating to misconduct, will not be included in a reference – this includes if it is a history of repeated concerns or allegations which have been found to be false, unsubstantiated or malicious. Dawn Griffiths, in providing the reference will make no comments about her own personal views on the veracity of allegations. If an allegation exists which has yet to be investigated or an investigation is incomplete, Dawn Griffiths will seek advice, and legal advice where necessary, on what information, if any, should be provided to the prospective employer.

## Use of data and confidentiality

Personal data relating to references will be handled in line with the Data Protection Policy. All references will be properly addressed and marked private and confidential.

In accordance with the Data Protection Act (2018) all personal documents will be checked, scanned and returned to applicants in the presence of the applicant. E-copies of the documents will be stored securely with password protection. As Bespoke Learning Ltd. is a micro company no one other than Dawn Griffiths will have access to the documents.

Information relating to an individual's health and sensitive personal data, e.g. information relating to the individual's ethnicity, religion or trade union membership, will not be disclosed as part of a reference unless 'express consent' has been received from the individual for this purpose.

The person requesting a reference will be offered the opportunity to see it before it is sent, this is in line with the Data Protection Act. If the person raises comments about the reference before it is sent, Dawn Griffiths will consider the comments and, if she decides to leave it unchanged, record the reason(s) behind their non-agreement.

## References for applicants

- Applicants will be shortlisted against the person specification for the post.
- Two references, one of which must be from the applicant's current/most recent employer where possible and be submitted by the Headteacher if the reference is from a school or college. If an applicant is invited for interview both references will be taken up prior to the interview- with the applicant's permission. However, if they do not arrive in time then the interview will still take but an appointment will not be made until the references have arrived and checked.

- Referees will be contacted to clarify any anomalies or discrepancies that may arise. Written records will be kept of such exchanges.
- Where necessary, previous employers who have not been named as referees may be contacted to clarify any such anomalies or discrepancies. Written records will be kept of such exchanges.

Referees will be asked specific questions about:

- the applicant's suitability to work with children and young people.
- any substantiated allegations.
- a request for information as to whether, to the referee's knowledge, the applicant has ever been the subject of a child protection investigation that was not found to be unsubstantiated, unfounded or malicious.
- any disciplinary warnings, including time-expired warnings, relating to the safeguarding of children and young people.
- the applicant's suitability for the post, including the applicant's ability and willingness to promote fundamental British values.
- since the post is exempt from the provision of the Rehabilitation of Offenders Act 1974, a request for any information that a referee may have about any criminal record that the applicant may have.

All appointments are subject to satisfactory references, vetting procedures and DBS clearance.

### **Online searches on shortlisted applicants**

Bespoke Learning Ltd. is committed to ensuring that safeguarding is a top priority; therefore, in line with KCSIE, Bespoke Learning Ltd. will carry out online searches on shortlisted applicants as part of their due diligence. Online searches solely aim to help identify any incidents or issues that have happened, and are publicly available online, which Dawn Griffiths, Director of Bespoke Learning Ltd. may want to explore with the applicant at interview.

Online searches will be conducted on shortlisted applicants only, by a professional individual who holds a current level 3 safeguarding certificate and therefore will have due regard to KCSIE. By choosing a professional who is independent of the recruitment process the risk of bias or discrimination will be minimised. Dawn Griffiths will consider any potential risks of online searches, e.g. unlawful discrimination or invasion of privacy, and will be clear on the reasons that online searches are being conducted. Online searches will only examine data that is publicly available.

The online search may include searching for the applicant by name via search engines and social media, such as:

- Google
- Facebook
- LinkedIn
- Instagram
- TikTok

When carrying out searches of shortlisted applicants' online presence, the person carrying out the search on behalf of Bespoke Learning Ltd. will look out for indicators of concern, such as:

- Inappropriate behaviour, jokes or language.

- Discriminatory comments.
- Inappropriate images.
- Drug or alcohol misuse.
- Anything that suggests the applicant may not be suitable to work with children.

Any concerns will be addressed during the interview process. Dawn Griffiths will ensure that applicants are given an opportunity to discuss any concerns raised by the online search.

### **The Interview and Selection Process ( KCSIE 2022 points 225 and 226)**

Interviews will always be face-to-face. Applicants will be required to:

- explain what attracted them to alternative education provision and their vision for working with students who cannot attend mainstream school.
- outline how they will engage and build the confidence of students who feel that education is not for them.
- communicate how they will work collaboratively with the Director of Bespoke Learning Ltd. to plan and manage a reintegration programme
- outline how they will assess progress (there will be an expectation that they do not focus solely on academic progress).
- demonstrate passion and commitment for alternative provision and show an understanding through discussion of the positive impact that effective AP can have on a student's future.
- explain any gaps in employment.
- explain any anomalies or discrepancies in their information.
- declare any information that is likely to appear on the DBS disclosure.
- demonstrate their ability to safeguard and protect the welfare of children and young people and their ability and willingness to promote fundamental British values.
- demonstrate in their answers that they are mentally and physically fit to carry out their responsibilities. If clarification is needed the applicant can be asked specific questions to establish this- KCSIE pg56 and 57, point 232).

Interviews will also be used to explore the potential areas of concern to determine the applicant's suitability to work with children.

Areas that may raise concerns and lead to further enquiry include:

- implication that adults and children are equal.
- lack of recognition or understanding of the vulnerability of children.
- inappropriate idealisation of children.
- inadequate understanding of appropriate boundaries between adults and children.
- indicators of negative safeguarding behaviours.
- attempts to push or overstep boundaries.
- consistent rule-breaking behaviour.

### **After the interview**

After the interview has been completed, Dawn Griffiths will:

- assess all applicants' performance using the same agreed criteria.
- ask the successful applicant to provide proof of identification and qualifications for Bespoke Learning Ltd.'s records, and to complete the DBS check as soon as possible.

- contact and provide feedback to the unsuccessful applicants – feedback will be verbal and based on evidence of their performance against the person specification for the role.
- hold interview notes and assessment materials (if used) securely for one year. This is in case any aspect of the recruitment process is challenged.

After choosing a successful applicant, Bespoke Learning Ltd. will:

- make a conditional offer of employment to the applicant.
- ask the successful applicant to provide identification and proof of qualifications, if this has not already been done.
- complete the relevant pre-appointment checks.

Any spent or filtered convictions declared on the applicant's self-declaration form, or declared at interview, will not affect the offer of employment if already made; however, Bespoke Learning Ltd. will undertake the relevant assessments to determine whether the applicant is suitable to work in the school.

### **Pre-appointment checks**

A successful applicant will not begin work with Bespoke Learning Ltd. until the Enhanced DBS certificate and barred list check have been completed.

An offer of appointment will be conditional until Dawn Griffiths has completed the following checks:

- Verified the applicant's identity, e.g. checking the name and birth date on a birth certificate and verifying any name changes.
- Obtained an enhanced DBS check through Bespoke Learning Ltd. and barred list information.
- Obtained evidence from the successful applicant that they have subscribed to the DBS update service.
- Verified the applicant's mental and physical fitness to carry out their role.
- Verified the person's right to work in the UK.
- Made further checks as appropriate on any individual who has lived or worked outside the UK.
- Verified professional qualifications.
- *[Non applicable]* Check individuals taking up management positions are not subject to a section 128 direction.
- *[Non applicable]* Ensure that appropriate checks are carried out to ensure that individuals employed to work in Reception classes, or in wraparound care for children up to the age of 8, are not disqualified from working in these settings under the 2018 Childcare Disqualification Regulations.
- *[Non applicable]* For those in management, trustee or governor roles, conduct a section 128 check.

Dawn Griffiths, Director of Bespoke Learning Ltd. will ensure any applicant employed to carry out teaching work is not subject to a prohibition order, or any sanction or restriction imposed (that remains current) by the GTCE before its abolition in March 2012. She will assess all cases fairly and on an individual basis. Where a decision has been made not to appoint somebody because of their convictions, it will be clearly documented to enable Bespoke Learning Ltd. a chance to defend its decision if challenged.

Bespoke Learning Ltd. will consider the following when assessing any disclosure information on a DBS certificate:

- The seriousness and relevance to the post which they have applied to.
- How long ago the offence occurred.
- The country where the offence occurred.
- Whether it was a one-off incident or a history of incidents.
- The circumstances around and at the time of the incident.
- Whether the individual accepted responsibility for what happened.
- Whether the offence has been decriminalised.

If Bespoke Learning Ltd. has reason to believe that an individual is barred, it is an offence under section 9 of the Safeguarding Vulnerable Groups Act (SVGA) 2006 for it to allow the individual to carry out any form of regulated activity. Therefore, the offer of employment will be retracted.

In line with KCSIE, Bespoke Learning Ltd. will not require applicants to have an enhanced DBS certificate or undergo checks for events that may have occurred outside the UK if, in the three months prior to their appointment, the applicant has worked in England in a post:

- In a school which brought them into regular contact with children or young people; or
- In a school since 12 May 2006 which did not bring the person into regular contact with children or young people; or
- *[Not applicable]* In an institution within the FE sector, or in a 16 to 19 academy, in a post which involved the provision of education which brought the person regularly into contact with children or young people.

This is because the applicant will have already undergone this process in their previous position in the UK.

All checks will be:

- confirmed in writing
- documented and retained on the personnel file
- followed up if they are unsatisfactory or if there are any discrepancies in the information received.

### **Applicants who have lived outside the UK**

Dawn Griffiths, Director of Bespoke Learning Ltd. is aware that The Teaching Regulation Agency no longer maintains a list of EEA (European Economic Area) teachers with sanctions and therefore she must carry out safer recruitment checks on all applicants on behalf of Bespoke Learning Ltd. and must make any further checks she thinks relevant.

For candidates who have lived outside the UK, all mandatory checks outlined in this policy will be carried out, along with additional checks where necessary, including an enhanced DBS certificate with barred list information for those engaging in regulated activity, even if they have never been to the UK before.

Bespoke Learning Ltd. will make any further checks that it deems appropriate so that any relevant events occurring outside the UK can be considered, e.g. obtaining proof of past teaching conduct for any candidate for a teaching position from the professional regulating authority in the country in which they worked, where available.

If a candidate is unable to provide the correct documentation, they cannot submit a DBS check. This is because the right to work in the UK cannot be established.

Following the UK's exit from the EU, Bespoke Learning Ltd. will apply the same approach for any individuals who have lived or worked outside the UK regardless of whether or not it was in an EEA country or the rest of the world.

## **Contractors**

Bespoke Learning Ltd. will ensure that any contractor, or any employee of the contractor, has been subject to the appropriate level of DBS check. Contractors engaging in regulated activity will require an enhanced DBS certificate (including barred list information). For all other contractors who are not engaging in regulated activity, but whose work provides them with an opportunity for regular contact with children, an enhanced DBS check (not including barred list information) will be required. Under no circumstances will a contractor in respect of whom no checks have been obtained be allowed to work unsupervised or engage in regulated activity.

Bespoke Learning Ltd. will set out its safeguarding requirements in the contract between the contractor's organisation and itself.

If a contractor is self-employed, Bespoke Learning Ltd. will obtain a DBS check, as self-employed people are not able to make an application directly to the DBS on their own account. In addition, Bespoke Learning Ltd. will always check the identity of contractors and their staff on arrival at the teaching venue.

## **Identification checking process**

When checking the validity of identifying documents, Bespoke Learning Ltd. will ensure that this is done in the presence of the holder, e.g. in person. Bespoke Learning Ltd. will be in physical possession of the original documents. Bespoke Learning Ltd. will only accept valid, current and original documentation in its physical form. Bespoke Learning Ltd. will not accept photocopies or documentation printed from the internet, e.g. internet bank statements.

Bespoke Learning Ltd. will request documents with photographic identity, such as a passport, and compare this against the applicant's likeness. Bespoke Learning Ltd. will not accept documents that are not in the applicant's current name as recorded on the application form.

Bespoke Learning Ltd. will ensure that the applicant declares all previous name changes and provides documentary evidence to support the name change. If the applicant is unable to provide evidence to support the name change, Bespoke Learning Ltd. will hold a discussion with the applicant about the reasons why. Bespoke Learning Ltd. will always check the name on the applicant's birth certificate to validate their identity.

Bespoke Learning Ltd. will compare the applicant's address history with any other information the applicant has provided, such as a driving licence.

Bespoke Learning Ltd. will ensure that all letters and statements provided by the applicant are recent e.g. within a three-month period.

Bespoke Learning Ltd. will scan the documents and hand them back to the applicant. Bespoke Learning Ltd. will keep a dated record of every document that has been checked for the duration of the applicant's employment and for a further two years after they have left Bespoke Learning Ltd. These

will be stored securely in a scanned format which cannot be manually altered, e.g. JPEG or PDF document, and will be made available to the appropriate authorities if and when requested.

The applicant's DBS certificate will not be scanned. In line with the UK GDPR and Data Protection Act 2018, Bespoke Learning Ltd. will keep on record the applicants name, certificate number and date of issue of the applicant's DBS and will record securely that items: 1 – Police records, 2-information from the list held under section 142 of the education Act, 3-Children's DBS Barred list information and 4- other relevant information have nothing or, something recorded. The DBS certificate will be handed back to the applicant. Further checks throughout the period of employment will be made via the DBS update service, each check will take place with the permission of the applicant (employee).

### **After the pre-appointment checks**

Once the pre-employment checks have been completed, Dawn Griffiths will:

- Agree a start date with the applicant.
- Destroy the completed self-declaration forms.
- Add the required details of the checks carried out to Bespoke Learning Ltd.'s SCR.

### **Single central record (SCR) compliant with KCSIE point 270**

Dawn Griffiths, Director of Bespoke Learning Ltd. will maintain and regularly update the SCR. All new employees will be added to the record, which will include exclusively:

- All teachers who work for Bespoke Learning Ltd.

The bullet points below set out the information that is recorded in respect of teachers employed by Bespoke Learning Ltd. The record confirms that the following checks have been carried out or certificates obtained, and the date on which each check was completed, or certificate obtained: (the date recorded on the SCR is the date the document was seen, rather than the date it was issued.)

- An identity check
- A barred list check
- An enhanced DBS check
- A prohibition from teaching check
- Further checks on people living or working outside the UK, including checks for European Economic Area (EEA) teacher sanctions and restrictions
- A check of professional qualifications
- (*Not applicable*) A section 128 check
- A check to establish the person's right to work in the UK
- (*Not applicable*) For those in management, trustee or governor roles, a section 128 check

### **Safer recruitment training**

Bespoke Learning Ltd. is a micro company and Dawn Griffiths currently operates as a sole trader. The policies and practices are in place for Bespoke Learning to recruit new teachers. When Dawn Griffiths, Director of Bespoke Learning Ltd. decides that the time is right for the company to recruit one or more new teachers she will complete formal safer recruitment training through [PDSP](#) or [NSPCC](#) before the process of recruitment begins.

As a measure of good practice, Bespoke Learning Ltd. will ensure that Safer Recruitment training is renewed every five years.

Dawn Griffiths is aware of information regarding the following:

- The recruitment and selection process.
- Pre-appointment and vetting checks, regulated activity and recording of information.
- Other checks that may be necessary for teachers and for staff, volunteers and others should the company recruit staff other than teachers in the future.
- How to ensure the ongoing safeguarding of children and legal reporting duties on employers