

Policy Name	Safer Recruitment Policy				
Effective Date	January 2023	Date of last review/ revision	September 2024	Version No.	1
Author	Head of School				

Version History				
Version	Approved by	Revision Date	Details of Changes	Author
V1	AB	04.04.2024	Keeping Children Safe in Education, Change to the new publication September 2023	MT
	AB	04.04.2024	4.2. Our application form will include a statement saying that ICS London carries out online recruitment searches on shortlisted candidates and reviews publicly available information including social media and video sharing platforms.	MT
	AB	04.4.2024	5.4 Include reference to online searches, beyond social media	MT
	AB	04.4.2024	Footer changed to read Safer Recruitment Policy, September 2023.	MT
	AB	28.8.2024	Footer changed to read Safer Recruitment Policy, September 2024.	MT

	AB	04.09.2024	Point 14: Amendment to more than 3 months in the last 5 years.	MT

This policy will be reviewed in full by the School Directors and Head of School on an annual basis or more frequently if there are changes in policy.

Overview

Policy statement

The safe recruitment of staff in schools is the first step to safeguarding and promoting the welfare of children in education. International Community Schools Ltd (ICS London) is committed to safeguarding and promoting the welfare of all pupils in its care. As an employer, ICS London expects all staff and volunteers to share this commitment.

In line with recent legislation and guidance, ICS London takes very seriously its duty of care for all students. In order to help safeguard and promote the welfare of all its students, ICS London is committed to a thorough and consistent Safer Recruitment Policy.

Purpose

The aim of the Safer Recruitment Policy is to help deter, reject or identify people who might abuse students or are otherwise unsuited to working with them by having appropriate procedures for appointing staff.

ICS London has a principle of open competition in its approach to recruitment and will seek to recruit the best applicant for the job. The recruitment and selection process should ensure the identification of the person best suited to the role at ICS London based on the applicant's abilities, qualifications, experience and merit as measured against the job description and person specification.

ICS London views 'suitable' candidates as those who pose no risk to students and are aligned to its mission and vision.

The recruitment and selection of staff will be conducted in a professional, timely and responsive manner and in compliance with current employment legislation.

Applicability

This policy applies to ICS London staff involved in recruiting and members of the public wishing to work at ICS London.

Relevant legislation and guidance

- Keeping Children Safe in Education, September 2024
- Working Together to Safeguard Children 2023
- Prevent Duty Guidance for England and Wales 2015 (the Prevent Duty Guidance - updated 2023)
- Data Protection Act 2018
- Code of practice published by the Disclosure and Barring Service

Access

This policy is available on the ICS London website and is available upon request from the School offices.

The policy is provided to all staff (including temporary staff and volunteers) at induction alongside our Professional Code of Conduct.

Failure to comply

Failure to comply with this policy and its associated procedure will result in intervention from the School Directors and Head of School.

Policy

1. Roles and responsibilities

1.1 It is the responsibility of the School Directors to:

- Ensure ICS London has effective policies and procedures in place for recruitment of all staff and volunteers in accordance with DfE guidance and legal requirements
- Monitor and review the effectiveness of this policy and its compliance with current legislation

1.2 It is the responsibility of the Head, Bursar and other Managers involved in recruitment to:

- Ensure that the school operates safe recruitment procedures and make sure all appropriate checks are carried out on all staff and volunteers who work at the school.
- To monitor contractors and agencies' compliance with this document.
- Promote welfare of children and young people at every stage of the procedure.

The School Directors have delegated responsibility to the Head of School, Bursar and Primary and Deputy Head of School to lead in all appointments, however, the final decision will rest with the Head of School.

Recruitment and Selection Procedure

2. Job Descriptions and Person Specifications

A Job description is a key document in the recruitment process, and must be approved prior to taking any other steps in the recruitment process. It will set out the duties and responsibilities of the job role clearly and accurately.

All job descriptions and person specifications state that safeguarding and promoting the welfare of children is the main priority of the role.

The person specification informs the selection decision. It details the skills, experience, abilities and expertise that are required to do the job. The person specification will include a specific reference to suitability to work with children.

3. Advertising

To ensure equality of opportunity, ICS London will normally advertise vacant posts to encourage as wide a field of applicants as possible.

The lead recruiter must get written authorisation from the Head of School for launching a recruitment of any vacancy and prior to advertising.

When advertising roles, we will make clear:

- Our school's commitment to safeguarding and promoting the welfare of children
- That safeguarding checks will be undertaken
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974.
- Online checks will be carried out on all shortlisted candidates and candidates will be asked to talk through their applications during the interview, including periods when they were not working.
- All documentation relating to applicants will be treated confidentially in accordance with GDPR and the Data Protection Act 2018.

4. Application Forms

- 4.1. ICS London uses its own application form and all applicants for employment will be required to complete an application form containing questions about their academic and full employment history and their suitability for the role (in addition all applicants are required to account for any gaps or discrepancies in employment history – these gaps must be explored and recorded).

- 4.2. Our application form will include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity). The application form also has a link to our child protection and safeguarding policy and our policy on the employment of ex-offenders.
- 4.3. All applicants will be made aware that providing false information is an offence and could result in the application being rejected or summary dismissal if the applicant has been selected, and possible referral to the police and other professional regulatory bodies.

5. Shortlisting

- 5.1. Applicants will receive a job description and person specification for the role applied for. Application forms, job descriptions, person specifications, this policy and the School's Safeguarding and Child Protection Policy are also available to download from the School's website and can be printed and forwarded to applicants on request. The School will then conduct a shortlisting exercise by reviewing all application forms received in order to determine which applicants will be invited for interview.
- 5.2. The shortlisting exercise will usually be conducted by two members of staff (who will ideally also be involved in the interview process) and will consider any inconsistencies and look for gaps in employment and reasons given for them and explore all potential concerns.
- 5.3. All shortlisted applicants will be required to complete a self-declaration form prior to interview in which they will be asked to provide information about their criminal records history and other factors relevant to their suitability to work with children. This information will be considered and discussed with applicants at interview.
- 5.4. Following updated guidance in KCSIE 2024, ICS London now carries out online recruitment searches on shortlisted candidates. We will review publicly available social media and video sharing platforms. We look for content that calls into question the candidate's suitability to work with children and/or causes harm to the reputation of your school or trust. That means we are looking for content that evidences inappropriate or offensive behaviour, discrimination, drug or alcohol misuse and inappropriate photos or videos.
- 5.5. After the check has taken place the recruitment team will decide whether we want to explore any of the content with the applicant at the interview. In any case where the content is deemed serious we will bring the recruitment process to an end. If appropriate, the school will contact the LADO for advice.

6. References

- 6.1. References for applicants will be requested after short-listing has taken place. The only exception is where an applicant has indicated on their application form that they do not wish their current employer to be contacted. In such cases, this reference, which is always required, will be taken up immediately after the interview and prior to any formal offer of employment being made. ICS London do not accept open references.
- 6.2. At least two professional references must be provided and one of which must be from the applicant's current/most recent employer. ICS London will secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children. ICS London will ensure the reference is completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the senior management (headteacher/principal) as accurate in respect to disciplinary investigations.
- 6.3. In the case of direct appointments, references will always be sought and obtained directly from the referee. In the case of appointments made through recruitment agencies, applicants' references will be provided directly by the agency.
- 6.4. ICS London may, at its discretion, require further references as appropriate, in order to ensure the references are satisfactory for ICS London. ICS will liaise directly with referees any verify any information contained within references.
- 6.5. The purpose of references is to provide objective and factual information to support appointment decisions. Any discrepancies or anomalies within a reference will be followed up. The School's HR will follow up by telephone with the referee to verify the reference.
- 6.6. All the referees will be asked whether they believe the applicant is suitable for the job for which they have applied for and whether they have any reason to believe that that applicant is unsuitable to work with children and young people.

7. Interviews

- 7.1. ICS London always conducts a face-to-face interview wherever possible*, and the same panel should see all the applicants for the vacant position. At least one member of any interviewing panel will have undertaken safer recruitment training or refresher training as applicable.

- 7.2. The interview process will explore the applicant's ability to carry out the job description and meet the person specification. It will enable the panel to explore any anomalies or gaps that have been identified in order to satisfy themselves that the chosen applicant can meet the safeguarding criteria.
- 7.3. Any information in regard to past disciplinary action or allegations, cautions or convictions will be discussed and considered in the circumstance of the individual case during the interview process.
- 7.4. All applicants who are invited to an interview will be required to bring evidence of their photo identity, address and qualifications. Only original documents will be accepted and photocopies will be taken, signed and dated. Documentation from unsuccessful applicants will be destroyed in accordance with the School's Data Protection Policy.

*ICS London will always attempt to arrange a face-to-face interview. This may not be possible for some international candidates or possibly in the case of an extraordinary situation in which case some form of video link will be used.

Offer of Appointment and Pre-employment Checks

8. Offer of Appointment

- 8.1. All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, ICS will verify their identity, right to work in the UK, Enhanced DBS, barred list check, health-self declaration form, at least 2 professional references, professional qualifications (as appropriate), overseas criminal records, s128 management check (if applicable), prohibition check, and carry out further additional checks on the candidate such as overseas teacher sanction check.
- 8.2. The School will ask for all overseas police checks from the countries in which the candidate lived and worked. If the candidate does not have overseas records covering the last 5 years, and it is not possible to apply for a new police check, the School will request additional references or documents to confirm that the candidate is not prohibited to work with children and young people. The school will collect evidence from the candidate that they have attempted to contact the relevant authorities.
- 8.3. A staff record checklist will be used to track and audit paperwork. The checklist will be retained on personnel files. The Human Resources Department will inform the Head of School when all paperwork has been received.

9. DBS check and Portability of DBS

9.1. All staff at ICS London require an enhanced DBS Certificate (includes section 142 Check) and therefore a DBS Certificate must be verified before the commencement of employment of any new employee.

9.2. It is ICS London policy to re-check employee's DBS Certificates every 3 years. In addition, any employee that takes leave for more than three months (e.g. career break) must be re-checked before they return back to work.

9.3. Members of staff at ICS London are made aware by their line manager of their obligation to inform the HR Department of any cautions or convictions that arise between these checks taking place.

9.4. The DBS Code of Practice does not facilitate portability of DBS Certificate checks unless the applicant has registered to the DBS Update Service. For clarity, portability refers to the re-use of a DBS Certificate obtained for a position in one organisation and later used for another position in another organisation. ICS accepts DBS Certificates carried out by previous employer organisation as long as the individual is registered with the DBS Update Service.

9.5. ICS London will also accept a certificate carried out by another organisation if, in the three months prior to beginning work in their new appointment, the applicant has worked:

- in a school in England in a post which brought them into regular contact with children or in any post in a school since 12 May 2006; or
- in a 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.

In these cases, ICS London ensures that employment has been continuous via reference checks. In addition, ICS London will carry out a new enhanced DBS check within 3 months of an employee's start date.

9.6. For temporary supply staff, ICS London accepts an Enhanced DBS certificate completed by a recruitment agency, if the individual is recruited through the agency and there are no gaps in employment after the DBS was issued. ICS London obtains written confirmation from agencies that DBS checks are carried out on all supply staff prior to the commencement of work. In addition, the supply staff will need to present the original DBS certificate and photo identification on or before the first day.

9.7. When using the DBS update service ICS London will:

- Check that the employee's DBS certificate is for the same type of workforce (child/adult) and level (standard/enhanced) that is required for

the post at ICS London

- Check the identity of the person against the DBS certificate
- Get the applicant's consent to carry out the status check.

10. Dealing with convictions

All positions within the ICS London are exempt from the provisions of the Rehabilitation of Offenders Act 1974. All applicants must therefore declare all previous convictions and cautions, including those which would normally be considered "spent" except those received for an offence committed in the United Kingdom if it has been filtered in accordance with the DBS filtering rules. Further information on DBS filtering can be found here:

[New filtering rules for DBS certificates \(from 28 November 2020 onwards\)](#)

A failure to disclose a previous conviction (which should be declared) may lead to an application being rejected or, if the failure to disclose is discovered after employment has started, may lead to summary dismissal on the grounds of gross misconduct. A failure to disclose a previous conviction may also amount to a criminal offence. It is unlawful for the School to employ anyone who is barred from working with children.

It is a criminal offence for any person who is barred from working with children to apply for a position at the School. The School will make a report to the police and/or the DBS if: it receives an application from a barred person or it is provided with false information in, or in support of an applicant's application; or it has serious concerns about an applicant's suitability to work with children.

Where information is contained within the DBS, the School will carry out a risk assessment of any risk this poses and will discuss with the individuals. Information contained within the DBS certificate does not automatically mean that the individual is unsuitable for employment.

ICS London operates a formal procedure if a DBS Certificate is returned with details of convictions. Consideration will be given to the Rehabilitation of Offenders Act 1974 and the following assessment criteria:

- whether the conviction or other matter revealed is relevant to the position in question
- the nature, seriousness and relevance of the offence
- how long ago the offence occurred
- one-off or history of offences
- changes in circumstances
- decriminalisation and remorse.

A formal meeting will take place face-to-face to establish the facts with the HR and Head of School. A decision will be made following this meeting.

In addition, the ICS London job application form indicates by the following statement how to get independent, confidential advice on which cautions or convictions they must disclose so applicants are given time to obtain advice.

“The amendments to the Rehabilitation of Offenders Act 1974 [exceptions] Order 1975 [2013 and 2020] provides that when applying for certain jobs and activities certain convictions and cautions are considered "protected." This means that applicants do not need to be disclosed to employers and, if they are disclosed, employers cannot take them into account. Guidance about whether a conviction or caution should be disclosed can be found on the Ministry of Justice Website and on the websites of charities NACRO and UNLOCK”.

11. [Barred List, Disqualification from Childcare, Prohibition from Teaching and Section 128 checks](#)

If Enhanced DBS is not completed, the school will carry out a Barred List check and complete a risk assessment for any staff appointed.

Satisfactory clearance is required prior to the start of employment. Staff with direct contact (or management of such staff) with children in the Early Years and Foundation Stages will also be required to satisfy the Childcare (Disqualification) regulations with satisfactory completion of the Staff Suitability Self-declaration.

The school will carry out a Prohibition from Teaching check, using the TRA Teacher Services’ system, as required by the nature of the role.

The school will carry out a check for a Section 128 direction for any staff appointed to management positions (required from August 2015), being school heads, directors, staff on the senior leadership team and teaching positions with Faculty head responsibility. Satisfactory clearance is required prior to the start of employment.

The scope of the barring directions covers membership of proprietor and governors, and any staff management position which involves regulated activity (All members of the Senior Management Team and all teaching posts above teacher).

12. [Proof of identity, Right to work in the UK & Verification of Qualifications and/or Professional status](#)

All applicants invited to attend an interview at ICS London will be required to bring their proof of identity (preferably original Birth Certificate and valid photo ID), proof of eligibility to work in UK, proof of National Insurance number, overseas criminal records, proof of address and most recent DBS certificate in accordance with those set out in the Immigration, Asylum and Nationality Act 2006 and DBS Code of Practice Regulations.

In addition, applicants must be able to demonstrate that they have actually obtained any academic or vocational qualification legally required for the position and claimed in their application form.

13. Medical Fitness

The School is legally required to verify the medical fitness of anyone to be appointed to a post at the School, after an offer of employment has been made but before the appointment can be confirmed. Following an offer of employment (s. 60 Equality Act 2010, refers) applicants are then requested to complete a Health Self Declaration form and where appropriate a doctor's medical report may be required. No job offer will be withdrawn without first consulting with the applicant, obtaining medical evidence and considering reasonable adjustment.

14. Overseas checks

ICS London will request criminal record checks from the applicant's country of origin and all the countries the applicant has lived and/or worked in for more than 3 months in the last 5 years.

From 1 January 2021, following the UK's exit from the EU, professional regulators in the EEA will no longer share information about sanctions imposed on EEA teachers with the Teaching Regulation Agency. The TRA will therefore no longer maintain a list of EEA teachers with sanctions.

The School is required to seek information from an individual's criminal history from their country of origin or in which they have worked.

The school will request a statement of good conduct or extra reference if the person has already left the country and cannot obtain an overseas criminal record. The applicant will not be permitted to commence work until the overseas information has been received and is considered satisfactory.

Overseas teacher sanctions check

From January 2021, the school must obtain proof that an applicant has contacted the professional regulating authority in the overseas country or countries in which the applicant has worked. This is to confirm that there have not been any sanctions or restrictions imposed upon the applicant teaching, and that there is no reason why the applicant may be unsuitable to teach.

Certificate of Sponsorship(CoS)

In accordance with UK Visas and Immigration, the School will sponsor new foreign nationals if the applicant meets the requirements for Skilled Worker Visa. Head of School, Bursar, Primary Principal or Deputy Head of School must consult with the HR to establish whether the school can offer a CoS.

15. Induction

All new employees will be given an induction programme which will clearly identify ICS London policies and procedures, including the Safeguarding (incorporating Child Protection) Policy, KCSIE and the Professional Code of Conduct which makes clear the expectation and codes of conduct which will govern how staff carry out their roles and responsibilities.

In addition, all the new employees will complete mandatory training including Child Protection, Prevent Duty and Health and Safety modules.

16. Single Central Record

In addition to the various staff records kept at ICS London and on individual personnel files, a single centralised record of recruitment and vetting checks is kept in accordance with the DfE requirements. This is kept up to date and retained by the Human Resources Department. All the employees at ICS (whether or not in regulated activity), Supply Staff, Self-employed contractors arranged by the staff and proprietors are included in the Single Central Record (SCR).

The SCR must contain the following information;

- Identity check
- Post to which appointed
- Right to work in the UK Check
- Barred list check
- An enhanced DBS check
- A prohibition from teaching check
- A section 128 check (where applicable)
- Further checks on people who have lived or worked outside the UK
- Qualifications check (where applicable)
- Reference check
- Employment history check
- Medical fitness check
- Disqualification from childcare check (where applicable)

For agency and third party supply staff, schools must include whether written confirmation has been received that the employment business supplying the member of supply staff has carried out the relevant checks and obtained the appropriate certificate, the date this confirmation was received and whether details of any enhanced DBS certificate have been provided in respect of the member of staff. Agency workers and contractors will also be recorded on the Single Central Record. Details of an individual should be removed from the SCR at the end of the academic year once they no longer work at the ICS London.

17. Record Retention/Data Protection

ICS London will retain all interview notes on all applicants for a period of 6 months, after which time the notes of the unsuccessful applicants will be destroyed securely. The retention period is in accordance with the Data Protection Act 2018 and will also allow the School to deal with any data access requests, recruitment complaints or to respond to any complaints made to an Employment Tribunal.

All information retained on employees is kept centrally in the Human Resources Office in a locked and secure cabinet.

18. Ongoing Employment

ICS London recognises that safer recruitment and selection is not just about the start of employment, but should be a part of a larger policy framework for all staff, as identified through the observations and appraisal procedure. Renewed or additional employment checks will be carried out on existing staff if:

- they are appointed to a management position within the school or
- There are any concerns about their suitability

19. Referrals to the DBS and Teaching Regulation Agency

ICS London has a legal duty to make a referral to the DBS in circumstances where an individual has

- applied for a position at the school despite being barred from working with children or
- has deployed from the regulated activity to the work which is non-regulated activity or
- has been suspended or has resigned because they have harmed or pose a risk of harm to a child.

ICS London may also decide to make a referral to the Teaching Regulation Agency if the individual is a teacher.

Despite the best efforts to recruit safely there will be occasions when allegations of abuse against children and young children are raised. In cases relating to the behaviour of an employee (these behaviours are within the context of four categories of abuse (ie physical, sexual, emotional and neglect) the School's Disciplinary Policy will apply.

In cases of dismissal (or resignation) due to the above behaviour, ICS London will already have discussed the case with the Designated Officer for Allegations (DOFA) (formally known as LADO) in accordance with the school's Child Protection and Safeguarding Policy. ICS London will act on the DOFA's instructions with regard to which other authorities to inform. This may include referral to the Police, DBS and/or TRA.

20. Contractors and agency staff

Contractors engaged by the School must complete the same checks for their employees that the School is required to complete for its staff. The School requires confirmation that these checks have been completed before employees of the Contractor can commence work at the School.

Agencies who supply staff to the School must also complete the pre-employment checks which the School would otherwise complete for its staff. Again, the School

requires confirmation that these checks have been completed before an individual can commence work at the School.

The School will independently verify:

- the photo identity of staff supplied by a contractor or an agency and
- original DBS certificate

before contractors or agency staff commence work at the School.

The verification of the documents will be carried out by a school administrator at reception. It is vital to check the DBS and report to HR or Head of School (if HR is not available) if there are any concerns. Also check the photo id to ensure there is a clear resemblance.

Contractors and agency staff are not allowed to be in the school before 8.30am on their first day in order to ensure the documents are verified by a school administrator.

Contractors and agencies must inform the school administrators and HR if they arrange cover.

21. Visitors and Visiting speakers

All visitors must sign in and out at Reception, the wearing of a visitor's badge at all times and being escorted by a fully vetted member of staff between appointments.

The Prevent Duty Guidance requires the School to have clear protocols for ensuring that any visiting speakers, whether invited by staff or by pupils, are suitable and appropriately supervised. The School is not permitted to obtain a DBS disclosure or Children's Barred List information on any visiting speaker who does not engage in regulated activity at the School or perform any other regular ties for or on behalf of the School.

The School will also obtain such formal or informal background information about a visiting speaker as is reasonable in the circumstances to decide whether to invite and/or permit a speaker to attend the School. The School will always have regard to the Prevent Duty Guidance and the definition of "extremism" set out in KCSIE. In fulfilling its Prevent Duty obligations the School does not discriminate on the grounds of race, colour, nationality, ethnic or national origin, religion or religious belief, sex or sexual orientation, marital or civil partner status, disability or age.

22. Volunteers

The School will request an enhanced DBS disclosure and Children's Barred List

information on all volunteers undertaking regulated activity with pupils at or on behalf of the School (the definition of regulated activity set out above will be applied to all volunteers).

Under no circumstances will the School permit an unchecked volunteer to have unsupervised contact with pupils. It is the School's policy that a new DBS certificate is required for volunteers who will engage in regulated activity but who have not been involved in any activities with the School for three consecutive months or more. Those volunteers who are likely to be involved in activities with the School on a regular basis may be required to sign up to the DBS update service as this permits the School to obtain up to date criminal records information without delay prior to each new activity in which a volunteer participates.

In addition, the School will seek to obtain such further suitability information about a volunteer as it considers appropriate in the circumstances. This may include (but is not limited to the following):

- formal or informal information provided by staff, parents and other volunteers
- character references from the volunteer's place of work or any other relevant source; and
- an informal safer recruitment interview

23. Monitoring and Evaluation

The Head of School, Bursar and HR will be responsible for ensuring that this policy is monitored and evaluated within ICS London. This will be undertaken through formal audits of job vacancies and a yearly review of this policy.