Policy Name	Safer Recruitment Policy				
Effective Date	January 2023	**Date of last review/ revision**	Sept 2026	**Version No.**	V3
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 2024**	**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, August 2024**	**MT**
	AB	**28.8.2024**	**Footer changed to read Safer**	**MT**

			Recruitment Policy, September 2024.	
	AB	**04.09.2024**	**Point 14: Amendment to more than 3 months in the last 5 years.**	**MT**
V2	**AB**	**07.05.2025**	**Reviewed by the Advisory Board**	**MT**
	AB	**07.05.2025**	**TRA changed to DfE sign- in accounts**	**AB**
	AB	**07.05.2025**	**Point 8.2 "*for more than 3 months in the last 5 years".***	**MT**
	AB	**07.05.2025**	**Point 5.1 "at least one who is Safe Recruitment Trained".**	**MT**
	AB	**07.05.2025**	**Barred List, Disqualification from Childcare, Prohibition from Teaching and Section 128 checks**	**MT**
	MT	**05.09.2025**	**KCSIE 2025- Changes in accordance with KCSIE 2025**	**MT**
	MT	**11.09.2025**	**2. Reference to Safeguarding**	**MT**
	MT	**11.09.2025**	**4.2 list of specific items included**	**MT**
	MT	**11.09.2025**	**5.3 list of specific items included**	**MT**
	MT	**11.09.2025**	**5.4 Reference to the primary phase**	**MT**
	MT	**11.09.2025**	**6.3/6.4**	**MT**
V3		**01.09.2026**	**7.3 List of areas which will be explored during the interview.**	**AQ**
		01.09.2026	**7.4 Reference to practical component during interview process for roles that involve direct, day-to-day contact with pupils/students.**	**AQ**

		01.09.2026	**9.7 Update wording to include 'original'.**	**AQ**
		01.09.2026	**13. Medical section- Additional paragraph referencing the Equality Act 2010 under Medical fitness.**	**AQ**
		01.09.2026	**14. Overseas checks, ref to RA**	**AQ**
		01.09.2026	**Overseas sanction check referred to.**	**AQ**
		01.09.2026	**Reference to the Induction period and the number of courses colleagues are assigned.**	**AQ**
		01.09.2026	**Reference to agency and third party supply staff.**	**AQ**
		01.09.2026	**Staff declaration added to ongoing employment section**	**AQ**
		01.09.2026	**Example of when a referral to the Teaching Regulation Agency may be made.**	**AQ**
		01.09.2026	**risk assessment section added for volunteers who are not in regulated activity to determine if an enhanced DBS is required**	**AQ**
		01.09.2026	**Crime and Policing Act added to** Relevant legislation and guidance Section	**AQ**
		01.09.2026	Updated roles and responsibilities section to include Governing Body, Proprietors, and School Directors	**AQ**
		01.09.2026	Role and Responsibilities section updated to reflect that safer	**AQ**

			recruitment training for those involved in recruitment	
		14.09.2026	Update between ICS London internal policy additional rigor, compared to KCSIE Statutory timelines and frequencies. Distinguished within the policy.	**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 safer 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 deter and prevent people who are unsuitable to work with children from applying for or securing employment, or volunteering opportunities within the school by having robust recruitment 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 have been fully vetted to ensure they 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 2026*
- *Working Together to Safeguard Children 2026*
- *Working or volunteering in regulated activity with children* guidance
- DBS guidance on eligibility for roles working with children
- Data Protection Act 2018
- UK GDPR
- Data (Use and Access) Act 2025
- Equality Act 2010
- Rehabilitation of Offenders Act 1974 and relevant Exceptions Orders
- Education (Independent School Standards) Regulations 2014, where applicable
- Crime and Policing Act 2026
- Prevent Duty guidance

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 Governing Body, Proprietors, and 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

- Those involved with the recruitment and employment of staff to work with children have received appropriate safer recruitment training. The training should cover part three of KCSIE at a minimum.

- Those involved in recruitment should also understand the School's procedures for online searches, references, self-declarations, DBS eligibility and overseas checks

- 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, Primary Principal 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.

This ensures that safeguarding is embedded into all stages of the recruitment process and reflects ICS London's commitment to protecting the welfare of 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.
- As part of the shortlisting process, ICS London may undertake an online search using an appropriate search engine as part of its due diligence on shortlisted candidates. Candidates will be informed in advance that an online search may be undertaken.
- 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 since leaving school and their suitability for the role .

4.2. In addition all applicants are required to provide details of referees and account for any gaps or discrepancies in employment history – these gaps must be explored and recorded)In line with safer recruitment practices, all applicants will also be required to provide personal details including current and former names, current address, and national insurance number. Applicants will also be required to provide a statement outlining the personal qualities and experience that demonstrate their suitability for the post and how they meet the person specification.

4.3. 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.

4.4. 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.

4.5. As part of the application pack, the school will provide a link to the child protection and safeguarding policies and procedures. These can also be printed and forwarded to applicants on request.

5. Shortlisting

5.1. The School will 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, at least one who is Safer Recruitment trained (where reasonably

practicable, those involved in shortlisting should also participate 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 and sign a self-declaration form prior to interview, providing information relevant to their suitability to work with children. This will include details of their criminal record history, whether they are included on the children's barred list, prohibited from teaching, prohibited from taking part in the management of an independent school, information about any criminal offences committed in any country in line with the law as applicable in England and Wales,known to the police or children's local authority social care, disqualified from providing childcare, and any other relevant overseas information.

5.4. Applicants working with children under 8 in the primary phase will also be asked to complete and sign the childcare disqualification declaration.

5.5. All the above information will be considered and discussed with applicants at the interview.

5.6. In addition, as part of the shortlisting process, ICS London may undertake an online search using an appropriate search engine as part of its due diligence on shortlisted candidates. Candidates will be informed in advance that an online search may be undertaken.

5.7. 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 will normally be obtained before the interview, where possible. 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 does 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 Head of School (in the case of a teaching position) or direct supervisor in the case of a non-teaching position. 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, references should all include a signature and

if from a school, then stamped by the school where possible.

6.3. Where the applicant is not currently working with children, we will secure a reference from the relevant employer from the last time they worked with children. If the applicant has never worked with children, we will obtain a reference from their current employer.

6.4. All references will be verified to ensure that any discrepancies are satisfactorily resolved before the appointment is confirmed. Where information is vague or incomplete, the referee will be contacted for clarification. Details on the application form will be compared with the reference, and any discrepancies will be addressed with the candidate.

6.5. 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.

6.6. 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 and verify any information contained within references.

6.7. 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.

6.8. 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. A follow up phone call will be made to confirm this and verify the referee.

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. Interview panels will use structured questions agreed in advance and will include questions designed to assess safeguarding awareness, professional boundaries, understanding of children's vulnerability and the applicant's motivation for working with children

7.3. During the interview process, we will assess the applicant's ability to

carry out the job description and meet the person specification. We will explore what attracted the candidate to the post and their motivation for working with children, examine their skills and relevant experience, and probe any gaps in employment or frequent changes in role or location. This will enable the panel to address any anomalies or areas of concern and ensure the applicant meets safeguarding criteria and is suitable to work with children.

7.4. For roles that involve direct, day-to-day contact with pupils/students, candidates may be required to complete a practical component. Candidates will be supervised during this process.

7.5. 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.

7.6. 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.

7.7. All information considered in the schools decision making process will be clearly recorded along with decisions made.

*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, disqualification declaration for those who work in reception classes, or with children up to the age of 8, and carry out further additional checks on the candidate such as overseas teacher sanction check.

8.2. ICS London will undertake appropriate further checks for individuals who have lived or worked outside the UK, having regard to the circumstances of the individual and the information available from relevant overseas authorities.

The School will ask for all overseas police checks from the countries in which the candidate lived and worked for more than 3 months in the last 5 years. 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 complete a risk assessment to determine whether additional pre-employment documents will be requested. This may include 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. Given the nature of the school environment, and the opportunity for regular contact with students, employees at ICS London are usually deemed to be engaged in regulated activity.

ICS determines regulated activity according to the statutory definition in force at the time, including the relevant frequency/overnight conditions.

In a school setting, this also applies to roles that provide the opportunity for regular contact with students on the premises.

9.2. An Enhanced DBS Certificate, which includes Children's Barred List information, will be obtained for all staff in regulated activity. Where a role within the school does not fall under regulated activity, the Head of School and Human Resources team will determine the appropriate level of DBS check required.

9.3. A DBS Certificate must be verified before the commencement of employment of any new employee. In exceptional circumstances where a DBS certificate is still in progress, a risk assessment will be conducted by the Human Resources Team and Head of School. A separate Barred List check will also be obtained where the position involves regulated activity, and appropriate supervision measures will be enforced until the DBS returns.

9.4. As an additional safeguarding measure, ICS London requires employees in relevant roles to undergo a DBS re-check every three years. This is an internal School requirement and is in addition to the statutory pre-employment checking requirements.

As an additional ICS London safeguarding measure, the School may require a further DBS check following an extended period of absence, in accordance with its risk-assessment and HR procedures.

9.5. Members of staff at ICS London are made aware during their induction and throughout the course of employment on their obligation to inform the HR Department of any cautions or convictions that arise between these formal checks taking place. In addition, staff are required to complete an annual declaration confirming any changes which may affect their suitability, alongside their ongoing requirement to disclose any relevant information immediately.

9.6. 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 organisations as long as the individual is registered with the DBS Update Service. Candidates will be required to provide the physical DBS certificate.

9.7. 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 such cases, the previous certificate must have the same type of workforce (child/adult) and level (standard/enhanced) that is required for the post at ICS London

In addition, ICS London will always carry out a separate, independent Children's Barred List check before the individual starts work.

9.8. 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 of the relevant safer recruitment checks and the DBS checks that have been 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.

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

- Obtain the original physical certificate

- 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

Where a role is exempt from the Rehabilitation of Offenders Act 1974 under the applicable Exceptions Order, applicants will be required to disclose the convictions and cautions that they are legally required to disclose. Protected convictions and cautions must not be requested or taken into account.

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 in relevant to the position in question
- the nature, seriousness and relevance of the offence
- how long ago the offence occurred
- whether it was a one-off incident or a history of incidents one-off or history of offences
- changes in circumstances
- decriminalisation and remorse.

- The school will also consider the incident in the context of the Teachers' standards and Teacher misconduct guidance, if the applicant is applying for a teaching post

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

Where an Enhanced DBS certificate has not been received before an individual commences work in regulated activity, the school will ensure that a separate Children’s Barred List check has been completed and that the individual is appropriately supervised until the Enhanced DBS certificate is received. The school will also ensure that all other required pre-employment checks have been completed and will prepare an individual risk assessment prior to the commencement of work.

Staff who provide childcare or are directly involved in the management of staff who provide childcare in the Early Years Foundation Stage will be required to confirm that they are not disqualified from working in childcare under the Childcare (Disqualification) Regulations 2009.. The school will ask staff to complete a Suitability Self-Declaration form.

Prohibition from Teaching

As part of the safer recruitment process, the school will carry out Prohibition from Teaching checks for all teaching staff using the Department for Education (DfE) Teacher Services system. The check will confirm whether an individual is prohibited from teaching or is subject to any relevant restriction affecting their eligibility to teach.

S128 Check

At ICS London, we carry out a Section 128 check using the Department for Education (DfE) Teacher Services system for individuals whose roles fall within the scope of the Section 128 provisions. A Section 128 direction prohibits an individual from taking part in the management of an independent school. Checks will include individuals such as members of the proprietor or governing body and staff appointed to relevant management positions.

Where a Section 128 check is required, satisfactory clearance must be obtained before the individual commences the relevant role.

The school will maintain appropriate records of all required checks on the Single Central Record (SCR).

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 and accompanying documentation relating to any name change, e.g. marriage certificate (preferably the original Birth Certificate, 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, applicants are asked to complete a Health Self-Declaration form, in line with Section 60 of the Equality Act 2010, which allows health-related questions to be asked at this stage. This form includes questions about disability and health to establish whether the applicant has the physical and mental capacity for the specific role. Where appropriate, a doctor's medical report may also be requested. No job offer will be withdrawn without first consulting the applicant, obtaining medical evidence, and considering reasonable adjustments.

14. Individuals who have lived or worked Overseas

At ICS London, we conduct additional checks as part of our safer recruitment procedures for individuals who have lived or worked overseas for more than 3 months in the last 5 years. Where available, such evidence can be considered together with information obtained through other pre-appointment checks to help assess a candidate's suitability.

Overseas Criminal Record Checks

The school 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. This ensures the school thoroughly reviews an individual's criminal history from their country of origin or any country in which they have worked.

Where an overseas criminal record check is not available (for example, if the

person has already left the country and cannot obtain it), a statement of good conduct or extra reference will be obtained. The school will ask the applicant to provide relevant contact details for these documents to be secured.

Overseas teacher sanctions check

The school will ask applicants to obtain an overseas teacher sanction check from the professional regulating authority—often the Department or Ministry of Education in the country or countries in which the applicant has worked. This must confirm that they have not imposed any sanctions or restrictions, and that they are not aware of any reason why the individual may be unsuitable to teach.

Where this information is not available, a letter of professional standing will be obtained. The school will ask the applicant to provide contact details for this to be obtained directly by the Human Resource Team.

Where overseas checks or information cannot be obtained, the School will carry out a risk assessment, reviewing all pre-employment checks obtained to make an informed decision about whether to proceed with the appointment.

Certificate of Sponsorship (CoS)

During the recruitment process, the School will identify whether a vacancy is eligible for sponsorship under the Skilled Worker route. Sponsorship is only available for roles that meet the relevant UK Visas and Immigration requirements and where the School has the capacity to offer a Certificate of Sponsorship (CoS).

Where a vacancy qualifies for sponsorship and an applicant requires sponsorship, the Head of School and HR Manager will discuss this with the candidate. The decision to offer sponsorship will be made by the School on a case-by-case basis, taking into account the requirements of the role, the applicant's eligibility and the availability of 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.

All staff, including staff who do not work directly with children, will be required to read Part One of Keeping Children Safe in Education and the School's safeguarding and child protection policy as part of induction.

In addition, all new employees will complete a mandatory in-person HR induction with the Human Resources team and will also receive separate safeguarding training provided by the Designated Safeguarding Lead (DSL). As part of the induction programme, staff will be assigned additional online training modules, including Child Protection, the Prevent Duty, and Health and Safety.

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, Trainee Teachers. 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 required)
Reference check
Employment history check
Medical fitness check
Disqualification from childcare check (where applicable)

For agency and third-party supply staff, we will obtain written confirmation from the employing business that the necessary pre-employment checks have been completed and the appropriate certificates obtained. This confirmation will include the date it was received and whether details of any enhanced DBS certificate have been provided in respect of the individual.

The SCR will contain the checks required by KCSIE. ICS London may record additional information for internal audit and safeguarding purposes, but such additional information should not be interpreted as a statutory SCR requirement.

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 UK GDPR, Data Protection Act 2018, Data (Use and Access) Act 2025 and other applicable data protection legislation 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.

The School will not retain copies of DBS certificates unless there is a lawful and documented reason to do so. Where a copy is retained, it will normally be destroyed within six months.

All information retained on employees is kept centrally in the Human Resources

Office in a locked and secure cabinet.

18. Ongoing Employment

At ICS London we recognise that safer recruitment and selection is not just about the start of employment, but should be part of a larger policy framework for all staff, as identified through the observations and appraisal procedure. The School adopts an open-door policy and creates a culture and environment where staff feel comfortable raising safeguarding concerns and understand how and to whom concerns should be reported, including concerns relating to matters within or, where appropriate, outside of the workplace (including online), which may have implications for the safeguarding of children.

During induction, all staff receive a safeguarding induction with the School Designated Safeguarding Lead. During induction, staff are also made aware of their duty to disclose any changes in circumstances that may affect their suitability to the Human Resources team.

In addition, all staff are required to complete an annual staff declaration to confirm their suitability and disclose any changes in circumstances that may affect their employment. All staff are reminded of the ongoing requirement to disclose any relevant information immediately.

Renewed or additional employment checks

There are limited circumstances where the School will need to carry out new checks on existing staff or volunteers. These are when:

- an individual working or volunteering at the School moves from a post that was not regulated activity with children into work which is considered to be regulated activity with children. In such circumstances, the relevant checks for that regulated activity will be carried out;
- As an additional ICS London safeguarding measure, the School may require further pre-employment checks where there has been a break in service of 12 weeks or more or
- there are concerns about an individual's suitability to work with children.

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 been removed from regulated activity (or would have removed an individual if they had not left). And the individual has:

- engaged in relevant conduct in relation to children and/or adults, and/or
- satisfied the harm test in relation to children and/or vulnerable adults, and/or
- been cautioned or convicted of a relevant (automatic barring either

with or without the right to make representations) offence. .

- This duty applies equally to paid staff and volunteers where they were engaged in regulated activity

The school will also make a referral to the DBS if an applicant has applied for a position at the school despite being barred from working with children. The referral will be made as soon as possible when the individual is removed from regulated activity. The DBS will consider whether to bar the person.

Duty to consider referral to the Teaching Regulation Agency

Where the circumstances meet the relevant statutory criteria, ICS London will consider whether a referral to the Teaching Regulation Agency is required and will make any referral required by the applicable guidance.

ICS London may also decide to make a referral to the Secretary of State if the individual is a teacher. The Secretary of State may investigate the case, and if there is a case to answer, must then decide whether to make a prohibition order in respect of the person

This may include cases were:

● An individual has been dismissed, or the School has ceased to use the services of a teacher, because of serious misconduct, or would have done so had they not left first.

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-individuals engaged in regulated activity

Contractors and agency staff must be subject to the level of safeguarding and DBS checks appropriate to the duties they undertake and the nature and frequency of their contact with children.

Regulated activity: enhanced DBS + Children's Barred List

Regular contact but not regulated activity: enhanced DBS without Children's Barred List

No regular contact: appropriate risk-based arrangements.

The School requires written confirmation from the provider that these statutory checks have been completed, including the appropriate level of DBS check. Those engaged in regulated activity will require an Enhanced DBS check including Children's Barred List information.

If a contractor is self-employed, the School will directly obtain the pre-employment checks on behalf of the individual.

Additionally, the School will physically inspect the original photographic identification of every contractor upon their initial arrival on-site to verify their identity and DBS certificate before work commences.

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 photographic identity of staff supplied by a contractor or an agency, and
- The original physical 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 certificate and report to HR or the Head of School (if HR is not available) if there are any concerns. Staff must also check the photographic ID to ensure there is a clear visual resemblance.

Contractors and agency staff are not allowed to enter the school before 8:30 am on their first day in order to ensure their documents can be verified by a school administrator.

Contractors and agencies must inform the School if they arrange staff cover. The contractors and agencies will be required to send an amended compliance document confirming that all appropriate vetting checks have been completed for the individual covering. Under no circumstances will a contractor or agency staff member on whom no checks have been obtained be allowed to work unsupervised or engage in regulated activity at the School.

Contractors- Site Maintenance/facilities, Kitchen

For all maintenance and operations, the Human Resources team works directly with the Deputy Head of School, the Maintenance team, the Bursar, and the Head of School to ensure that appropriate vetting and safeguarding processes are in place before any contractor arrives on-site.

A formal Letter of Assurance will be requested prior to the commencement of long-term works from the respective company. This letter will include information on any relevant vetting that has taken place, identity verification, professional competencies where required, and a DBS check where possible.

For contractors who have an opportunity for regular contact with children but are not engaged in regulated activity, where the role is eligible for an enhanced DBS check, an enhanced DBS check will be requested.

For short-term or emergency works, the School will request a valid booking confirmation email and require that the contractor brings physical photographic identification which will be checked on arrival.

In all instances where standard safer recruitment checks are not in place, maintenance contractors are strictly prohibited from working unsupervised and must remain under the continuous supervision and escort of a fully vetted member of School staff at all times while pupils are on-site.

The School will independently verify:

- The photographic identity
- The original physical DBS certificate if available

Wherever reasonably practicable, emergency or short-term works may be arranged at a time when pupils are not present on site.

21. Visitors and Visiting speakers

Ordinary visitors

- sign in/out;
- visitor badge;
- appropriate supervision;
- no DBS required simply because they visit.

Professional visitors

- assess nature of visit;
- assess contact with children;
- verify employer/checks where appropriate.

Visiting speakers

- appropriate due diligence;
- safeguarding/risk assessment;
- Prevent considerations;

- supervision appropriate to circumstances.

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.

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 for any visiting speaker who does not engage in regulated activity at the School or perform any other regular duties for or on behalf of the School.

22. **Volunteers**

The School requests full pre-placement and suitability checks for all volunteers before they are permitted to work on site or engage in school activities. As part of the pre-employment checks, 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. In accordance with statutory safeguarding guidance, the definition of regulated activity includes any volunteer who teaches, trains, instructs, cares for, or supervises children frequently, or undertakes relevant regulated activity overnight, regardless of whether they are supervised by a member of staff.

Under no circumstances will the School permit an unchecked volunteer to have unsupervised contact with pupils. Volunteers will not be permitted to begin work at the school until the School has physically received and verified their enhanced DBS certificate with barred list information.

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 check the status of their DBS certificate prior to each new activity in which a volunteer participates.

One-Off Volunteers

For occasional or one-off volunteers (such as parents assisting on a single day trip or at a one-off school event) who do not meet the statutory frequency threshold for regulated activity, the School will enforce strict safety protocols. A written risk assessment must be completed prior to the activity. Under no circumstances will a one-off, unvetted volunteer be left alone with pupils or given unsupervised access. They will be subject to continuous, line-of-sight supervision by a fully vetted member of permanent staff at all times while on site or participating in a school-led activity.

Trainee/student teachers

Where trainee or student teachers are employed and salaried directly by the school, the School will directly carry out all necessary pre-employment checks, including an Enhanced DBS check with Children's Barred List information.

For fee-funded trainees, the school will obtain written confirmation from the Initial Teacher Training (ITT) provider of all the statutory pre-appointment checks that have been completed and the trainee is suitable to work with children.

23. Monitoring and Evaluation

The Head of School, Bursar and HR Manager 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.

The annual review will include an audit of a sample of recruitment files and the Single Central Record to ensure that recruitment and vetting arrangements remain compliant with KCSIE and other applicable statutory requirements.