

The American School in London

Vetting and Safer Recruitment Policy

The current version of any policy, procedure, protocol or guideline is the version held on the ASL website. It is the responsibility of all employees to ensure that they are following the most up-to-date version.

Responsible party	Human Resources
Approved by	Board of Trustees
Responsible board committee	Admin/Finance
Approval date	September 2026

Appropriate vetting of potential employees and volunteers is an essential aspect of ASL's commitment to safeguarding the welfare of children.

Purpose

Safeguarding and promoting the welfare of children are integral to school management. Robust and rigorous recruitment and selection practices help reject or deter unsuitable applicants from gaining positions within the School and help to ensure that the community is fully committed to the welfare of children, contributing to a safe and secure school environment. The purpose of this policy is to:

- collate principles of good practice and provide guidance that incorporates statutory requirements
- ensure that ASL fulfills its obligations to safeguard and promote the welfare of children by preventing, as far as possible, the recruitment of individuals who are unsuitable to work with children and by recruiting and training individuals who have positive safeguarding attitudes ensure that the best possible employees are recruited on the basis of their merits, abilities and suitability for the position
- ensure compliance with all relevant legislation, recommendations and guidance including the statutory guidance published by the Department for Education (DfE),

Keeping Children Safe in Education (September 2026) (KCSIE), Disqualification under the Childcare Act 2006, the Rehabilitation of Offenders Act 1974 and associated Exceptions Orders, and relevant guidance and codes of practice published by the Disclosure and Barring Service (DBS).

All ASL employees involved in the recruitment and selection of new employees are responsible for familiarizing themselves and complying with the provisions of this policy.

Scope

The measures described in this policy are applied in settings where adults are in contact with children, directly or indirectly, while undertaking paid or unpaid work for ASL or delivering services as part of a contractual agreement with an external organization.

Roles and responsibilities

All trustees, employees and volunteers have a responsibility to ensure that the school environment is safe and secure for children and that appropriate procedures are followed. It is the responsibility of those involved with recruitment, selection and induction of trustees, employees and volunteers to ensure a full and satisfactory vetting process has been followed.

Those arranging interviews must ensure that at least one person on the interview panel has completed safe recruitment training either via the National Society for the Prevention of Cruelty to Children (NSPCC) website or through a recognized training provider. A list of those who have received appropriate training is available from the HR department, and all members of the HR department complete the training regularly.

Equal opportunities

ASL is committed to securing genuine equality of opportunity. All applicants will be considered fairly and consistently. No applicant will be treated unfairly on any grounds including race, age, disability, sexual orientation, marriage and civil partnership, pregnancy and maternity, gender reassignment, religion or belief.

Safeguarding statement

The following statement should be used in recruitment and induction documentation where appropriate:

The American School in London is committed to safeguarding and promoting the welfare of children and young people and expects all trustees, employees and volunteers to share this commitment. All appointments are subject to the checks appropriate to the role and circumstances. These may include verification of identity (including current and former names), right to work in the UK, a full employment history and exploration of gaps, relevant qualifications, suitable references, an enhanced DBS check and (where the role is regulated activity) children's barred list information, checks using the DfE's Check a teacher's record service, a section 128 direction check for relevant management roles, childcare disqualification checks where applicable, and appropriate overseas checks. Shortlisted candidates will also be informed that the School may carry out an online search as part of its safeguarding due diligence.

All posts involving direct contact with children are exempt from the Rehabilitation of Offenders Act 1974. However, amendments to the Exceptions Order 1975 (2013 & 2020) provide that certain spent convictions and cautions are 'protected'. These are not subject to disclosure to employers and cannot be taken into account. Guidance and criteria on the filtering of these cautions and convictions can be found on the Ministry of Justice website. Shortlisted candidates will be asked to provide details of all unspent convictions and those that would not be filtered, prior to the date of the interview. You may be asked for further information about your criminal history during the recruitment process. If your application is successful, this self-disclosure information will be checked against information from the Disclosure & Barring Service before your appointment is confirmed.

The vetting and the recruitment process for employees

The following elements of the recruitment process should be used to deter and reject unsuitable candidates:

- Job descriptions must be up to date and make reference to the responsibility for safeguarding and promoting the welfare of children as well as include the 'safeguarding statement'
- The person specification must include specific reference to suitability to work with children
- Advertisements must include the 'safeguarding statement' provided above
- Applicants must complete the School's application process so that comprehensive information can be scrutinized. Prior to interview, applicants must provide a full history since leaving school, including education, employment and voluntary work, and reasons for any gaps.
- Shortlisted candidates will be asked to complete and sign a self-declaration of their criminal record and any other information that may make them unsuitable to work with children, in accordance with Ministry of Justice filtering rules. This information will be considered and, where relevant, discussed at interview before the DBS certificate is received.
- At least two suitable references* will normally be obtained. References should be obtained before interview where possible. One must normally be from the candidate's current employer; where the candidate is not currently working with children, a reference must also be obtained from the relevant employer from the last time they worked with children.
- The School will only accept references obtained directly from the referee and will not rely on open references, testimonials or references supplied by the applicant. References must be completed by a senior person with appropriate authority; where the referee is school/college based, the reference should be confirmed by the headteacher/principal as accurate in respect of any disciplinary investigations.
- All reference requests sent by ASL will include questions relating to the individual's suitability to work with children.
- HR will compare references with the application information, follow up discrepancies or vague/insufficient information, establish the reason for leaving the current or most recent post, and always verify reference information with the person who provided it. Any concerns must be resolved satisfactorily before appointment is confirmed.
- In cases where a reference is required for a candidate who has previously held the

same or a similar role at ASL and is applying for repeated or seasonal work, the HR department may accept an existing reference held on file, which will then be subject to a check with the reference provider to confirm its currency and relevance.

- As part of the shortlisting process, the School will consider carrying out an online search using a search engine on shortlisted candidates as safeguarding due diligence. Shortlisted candidates will be informed that this may take place. Any publicly available information of potential relevance will be considered fairly and, where appropriate, explored with the candidate at interview.
- At each interview the candidate will be asked questions which are designed to ascertain their suitability to work with children. All staff interviewing candidates will be aware of their safeguarding responsibilities throughout the interview.
- Verification of identity, right to work documents, and original proof of relevant qualifications must be provided prior to taking up the role.
- Completion of mandatory pre-appointment checks, including an enhanced DBS check and children's barred list information where the individual will engage in regulated activity. Barred list information will not be requested where the individual is not engaging in, or seeking to engage in, regulated activity.
- An enhanced DBS check will be obtained at the level appropriate to the role. Most employees at ASL will be engaging in regulated activity and will therefore require an enhanced DBS check including children's barred list information. For roles involving regular contact with children that do not meet the definition of regulated activity, an enhanced DBS check without barred list information may be appropriate. Only relevant information will be taken into account; see the School's policy on recruitment of ex-offenders.
- Overseas background checks will be sought in accordance with the guidance below
- Verification that the applicant is medically fit to carry out the role will be sought by requesting that they provide a 'Fitness to Work' certificate. This will be offered once a conditional offer has been made. HR may request an occupational health appointment where a medical condition is declared that may require reasonable adjustments to the employee's working
- For teaching roles, the DfE's Check a teacher's record service will be used to check teacher prohibition and, where applicable, QTS and completion of induction/probation.
- For trustees and any employee whose role amounts to participation in the management of the independent school, a section 128 direction check will be carried out. Job title alone is not determinative and the School will consider the responsibilities of the role.

* A suitable referee will usually be a principal or head of school for teaching positions. For other positions, it may be the supervisor or line manager. For those who were previously self-employed, clients may be suitable referees. Academic references are also acceptable. Colleagues, peers and character references will not normally be considered acceptable. Electronic references will be vetted to ensure they come from a credible source.

** Supervisors must discuss each case with the HR director or manager in order to establish what vetting checks are appropriate to the situation.

DBS checks

The School will obtain DBS checks at the level required by KCSIE and the nature of the role. Most employees will require an enhanced DBS check including children's barred list information because they will engage in regulated activity. The original DBS certificate must be seen and checked in accordance with KCSIE, including where the DBS Update Service is used. Where the School permits an individual to start regulated activity before the enhanced DBS certificate is available, this will only be in exceptional circumstances after all other relevant checks have been completed, a separate children's barred list check has been obtained, and appropriate supervision and a written risk assessment are in place. This exception does not apply to work within settings covered by the EYFS framework: no individual may begin working in the EYFS setting until the School has received the enhanced DBS certificate including barred list information. Employees must immediately inform the Head of School or HR of any matter arising during employment that may affect their suitability to work with children.

Overseas background checks

Where a candidate has lived or worked outside the UK, the School will make such further checks as it considers appropriate so that relevant events occurring outside the UK can be considered. The nature and extent of checks will be determined on a case-by-case basis, taking account of the country, the period and purpose of residence/work, the role applied for, and the information otherwise available. This may include criminal records checks/certificates of good conduct and, for teaching roles, checks relating to professional standing or sanctions where available.

Where it is not possible to produce a criminal background check or certificate of conduct from the applicant's country's embassy, they will be asked to provide additional professional references. It should be noted that when applying for background checks from overseas, there will be unavoidable variation in the quality of information available from different countries and the level of vetting that is practically possible. For further information about overseas criminal records checks, please view UK government [guidance](#).

Risk assessment pending arrival check(s)

All mandatory pre-appointment checks must be satisfactorily completed before appointment is confirmed. Only in exceptional circumstances may an individual begin regulated activity before the enhanced DBS certificate is available, and only where KCSIE permits this: all other relevant checks must have been completed, a separate children's barred list check must have been obtained, the Head of School must expressly approve the arrangement, and a written risk assessment and appropriate supervision must be in place. The individual must not undertake unsupervised activity or residential trips until the outstanding check is complete. For any work in a setting covered by the EYFS framework, the individual must not begin work until the School has received the enhanced DBS certificate including barred list information.

Repeat checks

Vetting checks will not normally be repeated unless the School has good reason to do so (for example, when an employee returns from a period of leave exceeding three months, or as part of a disciplinary investigation). Ancillary staff with irregular patterns of employment, such as

coaches and substitute teachers, will be asked to repeat the DBS check every three years, or when there has been a break in their employment of three months or more (not including the summer vacation).

Ongoing vigilance

The School takes its responsibility to safeguard children very seriously and any employee and/or successful candidate who is aware of anything that may affect their suitability to work with children must notify the School immediately. This will include notification of any convictions, cautions, court orders, reprimands or warnings they may receive. Failure to declare any convictions (that are not subject to DBS filtering) may be considered gross misconduct and disqualify a candidate for appointment or result in summary dismissal if the discrepancy comes to light subsequently.

Disqualification from childcare: Early years and later years provision

The Childcare Act 2006 and the Childcare (Disqualification) Regulations 2018 apply to certain individuals providing or managing relevant early years childcare and later years childcare, including specified wraparound provision for children under the age of 8. The School will identify roles within scope and carry out the checks required by the Regulations and DfE guidance.

Candidates, employees and volunteers in roles within scope must provide the information reasonably required by the School to establish that they are not disqualified from the relevant childcare. The School will not ask questions about cautions or convictions of people living or working in the individual's household unless the applicable law and guidance specifically require this. Individuals must notify the School if circumstances arise that may affect their suitability or disqualification status.

An individual who is disqualified may, where permitted, apply to Ofsted for a waiver. A disqualified individual must not be employed in, or directly involved in the management of, the provision from which they are disqualified unless and until a waiver has been granted.

Key responsibilities for continuous training and monitoring

- The Designated Safeguarding Lead (DSL) will ensure that all employees (including ancillary staff, such as substitute teachers and coaches) receive regular formal safeguarding and child protection training, and briefings and updates regularly and at least annually.
- All new employees (including ancillary staff) will undertake induction training, including child protection/safeguarding, online safety, health and safety, responsible use of technology, safe working practices and whistleblowing. Induction will identify the School's safeguarding systems, policies and procedures and the expectations in the staff code of conduct. All staff, including those who do not work directly with children, will be required to read Part One of Keeping Children Safe in Education 2026 in full and acknowledge that they have done so. Safeguarding and child protection training will be regularly updated, with updates provided as required and at least annually.
- Divisional principals and supervisors should ensure that local induction programs, training and performance management practices ensure a safeguarding children

culture is adopted and embedded into continuing practice.

Central record of pre-employment checks

The School will maintain a single central record (SCR) of the recruitment and vetting checks required by the Education (Independent School Standards) Regulations 2014 and KCSIE. The SCR will record the required checks, the date on which each check was completed or the relevant certificate obtained, and any other information the School chooses to record as good practice.

The record will contain details of checks on the following people:

- All employees of the School;
- All substitute teachers, sports coaches, and other ancillary staff working with children;
- All personnel who are working at the School but employed by third parties;
- All others who have been chosen by the School to work in regular contact with children.

This will cover volunteers, trustees and people brought into the School to provide additional teaching or instruction for students but who are not employees, e.g., a specialist sports coach or artist. The central record will also include whether written confirmation has been received from supply agencies that all relevant checks have been conducted for supply staff.

The SCR will be kept accurate and up to date and will be readily available for inspection by ISI and other authorised bodies.

Those employed by a third party

For agency/contracted staff provided through a third party, the School will obtain written confirmation from the supplier that it has satisfactorily completed the pre-appointment checks that the School would otherwise be required to carry out for the role. Written confirmation will be obtained before the individual starts work. This will include, as applicable:

- Identity checks;
- Appropriate references and employment history checks;
- Verification of fitness to carry out the work responsibilities, where required;
- Qualification checks for any qualifications legally required for the job;
- Checks of permission to work in the United Kingdom;
- Children's barred list information where the role is regulated activity;
- An enhanced DBS check at the appropriate level;
- Further overseas criminal records checks where appropriate.

When the company does not have the capacity to independently make DBS applications, ASL may agree with a supplier to conduct the DBS checks on their behalf. Information disclosed as a result of a DBS application will be shared with the employer.

The supplier will not refer any new or additional personnel to ASL without completing the required checks and providing the School with the necessary written confirmation. The School will check the identity of agency and contracted staff on arrival. Where KCSIE requires the

School to see a DBS certificate, this will be done; where the third-party employer has confirmed the appropriate DBS check, the School will not routinely ask to see the certificate unless required by law or guidance.

For contractors working onsite for limited periods, a risk assessment will be completed in order to determine the appropriate checks required under ISI and KCSIE guidance.

Trustees

Members of the Board of Trustees form part of the proprietor body of the independent school. The checks required by the Education (Independent School Standards) Regulations 2014 and KCSIE will be completed, including enhanced DBS checks and section 128 direction checks as applicable. Trustees will also be asked to sign criminal record self-declaration forms. At least one trustee will have oversight of safeguarding arrangements and may undertake appropriate assurance activity, including review of the effectiveness and rigour of safer recruitment and vetting processes.

The Chair of the Board of Trustees will be subject to the checks for the chair of a proprietor body carried out by or on behalf of the Secretary of State, as required by the applicable regulations.

Volunteers

The School will determine whether a volunteer role is regulated activity under the definition in force from 1 September 2026. The former 'supervision exemption' no longer applies. A volunteer who teaches, trains, instructs, cares for or supervises children frequently, on more than three days in a 30-day period, or overnight will be in regulated activity; relevant personal care or healthcare may be regulated activity regardless of frequency. Volunteers in regulated activity must have an enhanced DBS check including children's barred list information. Existing volunteers who became regulated activity because of the 2026 change must have their children's barred list status checked in accordance with KCSIE. Trustees will also be asked to sign criminal record self-declaration forms.

For volunteers who are not in regulated activity, the School will complete and record a written risk assessment to determine what checks, if any, are appropriate. Under no circumstances will a volunteer on whom no checks have been obtained be left unsupervised or allowed to undertake regulated activity. Where the volunteer will work within a setting covered by the EYFS framework and the role is regulated activity, they must not begin work until the School has received the enhanced DBS certificate including children's barred list information.

Student workers

Students may be engaged to work in after-school programs, mentoring opportunities and as camp counselors. The checks required will be determined by the nature, frequency and circumstances of the role, including whether it constitutes regulated activity; age alone does not remove the need for appropriate safer recruitment checks. Right to work requirements will be verified where applicable. Student workers will receive appropriate induction and safeguarding training and will be subject to the School's staff code of conduct and safeguarding procedures.

Visitors not in regulated activity

Visitors will be managed according to the purpose and nature of their visit. The School will not request DBS or barred list checks for ordinary visitors such as children's relatives attending events. For professional visitors, the School will check identity and obtain assurance that the appropriate DBS check has been completed where the activity requires it; where an employer has provided that assurance, the School will not normally ask to see the DBS certificate. The Head of School or delegate will use professional judgement about escort and supervision. No unchecked visitor will be permitted to undertake regulated activity.