



SAFER RECRUITMENT POLICY

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| Revisada por: | Noelia Aulló |
| Última revisión: | Septiembre 2025 |
| Próxima revisión: | Septiembre 2026 |

Introduction & Reference documents

This document should be read in conjunction with the following:

- **Our Safer Recruitment Commitment document** – Detailing our commitments to safer recruitment which this policy supports the implementation of.
- ITFC [Expectations for School Communities – Statement of Commitment to Child Protection \(Dec. 2021\)](https://cdn.icmec.org/wp-content/uploads/2021/12/ITFCP-Expectations-for-School-Communities-Dec2021.pdf) <https://cdn.icmec.org/wp-content/uploads/2021/12/ITFCP-Expectations-for-School-Communities-Dec2021.pdf>
- ITFCP Recommended Recruitment Practices and Screening <https://www.cois.org/about-cis/child-protection/international-taskforce-on-child-protection/safeguarding-standards>
- ITFCP School Evaluation 24 Essential Questions <https://www.cois.org/about-cis/child-protection/international-taskforce-on-child-protection/safeguarding-standards>
- Keeping Children Safe in Education 2024 https://assets.publishing.service.gov.uk/media/6650a1967b792ffff71a83e8/Keeping_children_safe_in_education_2024.pdf
- Working Together to Safeguard Children 2023 https://assets.publishing.service.gov.uk/media/65cb4349a7ded0000c79e4e1/Working_together_to_safeguard_children_2023_-_statutory_guidance.pdf
- Orbital Recruitment Practice Guidance for Schools 2025

The safety of children in our school is paramount. This Safer Recruitment policy must be rigorously adhered to and **forms the basis for our school's Safer Recruitment Policy, practice and procedures.**

Any questions re the content or process, please contact either your RHOS, Group Head of HR or Head Office Designated Lead on Safeguarding and Child Protection and Director of Education: Michael Clack michael@orbital.education +44 161 485 7091

As part of a process of continual review and development and especially in the light of the suspension of Enhanced DBS checks by COBIS and the review of KCSIE 2024 this document was further updated in July 2025.

The purpose of this policy is to set out **the minimum requirements** of a recruitment process that aims to:

- attract the best possible applicants to vacancies.
- deter prospective applicants who are unsuitable for work with children or young people.
- identify and reject applicants who are unsuitable for work with children and young people.

Experience has shown that most problems with staff appointments occur because they have been made in haste, late in the school year, as a desperate measure to ensure there is a body in front of a class. This **MUST** be avoided. The risks to children and the school are too great in such circumstances. It is essential that adequate time be allowed for a rigorous selection process to be completed.

The appointment of internationally based teachers brings extra challenges and risks to our schools in the appointment process, which must be fastidious, robust and rigorous in the selection of teachers. We must always make strenuous efforts to ensure that Safeguarding practices are followed by all recruiters and the process is kept under constant review.

This policy details the approach which must be followed at each stage of the Recruitment Process to ensure that we meet all Safer Recruitment Requirements, as summarised within our Safer Recruitment Commitment.

It is set out sequentially, following each stage of the typical recruitment process – for ease of reference and implementation.

1. Establishing Individuals Responsible for Recruitment – The ‘Recruiting Managers’

Usually, recruitment of academic staff is the responsibility of the Principals or relevant member of SLT / Department Head (as assigned by the Principal). Orbital Head Office staff are always willing to assist. **Head Office representatives must be involved in the appointments for senior positions (see Delegation of Authority Manual).** The responsible Recruiting Managers must be agreed and confirmed with the School’s Principal prior to commencing recruitment.

All individuals responsible for or involved in recruitment (SLT, teaching, admin, HR and Finance) must have successfully received accredited training in safer recruitment procedures such as TES Develop or National College Accredited courses for Safer Recruitment for International Schools - Level 2 or provided by the RHoS.

Successful completion must be recorded at all schools. Other staff who may be involved in recruitment of administrative or non-academic staff should also complete an appropriate accredited course with completion also being recorded.

All recruiters must have read the documents ITFC [Expectations for School Communities – Statement of Commitment to Child Protection \(Dec. 2021\)](https://cdn.icmec.org/wp-content/uploads/2021/12/ITFCP-Expectations-for-School-Communities-Dec2021.pdf) <https://cdn.icmec.org/wp-content/uploads/2021/12/ITFCP-Expectations-for-School-Communities-Dec2021.pdf> and KCSIE 2024.

2. Advertising – Inviting applications

It is vital, as well as providing the appropriate “hooks” to attract candidates, that any advertisements for posts (whether in newspapers, journals or on-line) **must** include the statement:

“[Name of school] is committed to safeguarding children and young people. Rigorous checks are conducted during the recruitment process on all shortlisted candidates. All appointments are subject to Enhanced DBS or International Child Protection Certificate and Prohibition Checks (for people who have ever lived or worked in the UK) or Criminal Records (Police Check / Certificate of Good Conduct) disclosure from their most recent country of residence which must be provided on request by the candidate.”

The advertisement should also include the safeguarding responsibilities of the post as per the job description and personal specification. This approach is critical to provide a deterrent for unscrupulous applicants, to deter them from making an application in the first place.

Copy of the advertisement should be sent to Group HR recruitment@orbitaled.com who will arrange for publication on the Orbital website and employment page of our other schools’ websites.

Wherever an advertisement is placed, it is essential that the same advertisement appears on the school’s own website.

For Teaching vacancies at Schools with a TES subscription - it must also be placed on TES via the school's TES portal. This should be done locally by the school's HR department in conjunction with sending a copy to Group HR for the websites. Additional guidance on placing adverts is included in the **'Orbital Recruitment - Practice Guidance for Schools'** document.

What has also proved to be of enormous benefit in attracting candidates is having a video available on the school's website relating to living and working in the location – we recommend your websites include such material and can advise on this.

3. Accepting Applications

Adverts must request that ALL applications are sent to the same place / e-mail to aid review.

Prospective applicants will be acknowledged and supplied, whenever practicable, and provided with the following if any of this documentation has not already been included with the advert:

- Job description and person specification
- Child Protection and Safeguarding Policy
- Information about living and working in the country
- Candidates must be informed that for any candidate shortlisted, it will be a requirement of that a fully completed office/ **school application form** must be returned to the office/ school prior to any interview taking place.
- They will be required to provide either an Enhanced DBS or an International Child Protection Certificate <https://www.acro.police.uk/s/>
- They will be expected to produce a Police Report / Certificate of Good Conduct from the last country of employment **and for at least the previous five years of employment.**
- Candidates should be informed that "... if they have not heard from the school by (date to be inserted), then they will have been unsuccessful on this occasion. Alternatively, such can be included in the advert if the school wish/ prefer and this reduces administration – but it is critical the candidate is informed in one way or other.

Candidates **must complete an office/ school application form.**

It must be remembered that the CV only provides the prospective employer with the information the candidate wishes to offer. Any gaps in employment must be explored at interview with the applicant in addition to any series of short-term positions, and any employment under previous surnames. Any CV which contains a series of short-term employment positions should only be considered with the greatest of care - ideally should be discarded, or the candidate must be invited to complete a full application form to progress.

We should avoid candidates with irregular work patterns and several short-term employment periods. This is an indication that sustained and successful employment may be unlikely but can also indicate a safeguarding risk.

It must be stressed that the safeguarding of students and staff is paramount and must come before any last-minute measure to fill any gaps in staffing. We must take all measures possible to appoint staff who have the appropriate experience and, as far as we can tell, are fit and mentally stable enough to perform in a suitable manner.

It is preferable if a recent photograph should be attached to their application form to support identification and subsequent background checks for candidates who progress.

4. Shortlisting

The Company/ School should:

- ensure that at least **two people** conduct the shortlisting exercise where possible (it is recommended that those who shortlist conduct the interview for a consistent approach).
- consider any inconsistencies and look for gaps in employment and reasons given for them and explore all potential concerns.

Short-listing of candidates must be against the person specification for the post.

Further guidance in respect of effective shortlisting and selection can be found within the 'Orbital Recruitment - Practice Guidance for Schools' document.

Shortlisted candidates should be directed to complete an Application Form prior to interview/ appointment along with the following documents. Alternatively, any candidates attending in person can be asked to bring copies to their interview.

- Scans of academic qualifications
- Scan of any available Police Report from previous countries of employment
- Copy of Passport and Birth Certificate – main information page
- Proof of address in current country of employment
- Proof of address in home country

They should be advised that -

- A search may be made prior to interview in social media and that they be invited to declare anything which might be found which might be relevant to employment in the school, and
- They must complete a self-declaration of their criminal record or information that would make them unsuitable to work with children. Applicants must be asked to sign a declaration confirming the information they have provided is true, either at or ahead of interview.
- *All information submitted by unsuccessful candidates should be retained in accordance with local regulations.*

5. The Interview process (Selection)

Selection techniques will be determined by the nature and duties of the vacant post, but all vacancies will require an interview of short-listed candidates.

Interviews should always be face-to-face (which can include electronic face to face methods including Teams, Zoom or other video call systems). Telephone interviews may be used at the short-listing stage but are not a substitute for a face-to-face interview (which should be via video call).

Prior to the interview, the recruiters should thoroughly examine the Application Form and agree what, if any, anomalies need to be explored.

Candidates should always be required:

- to explain satisfactorily any gaps in employment.
- to explain satisfactorily any anomalies or discrepancies in the information available to recruiters.
- to declare any information that is likely to appear on a DBS disclosure/ICPC/police check.
- to demonstrate their capacity to safeguard and protect the welfare of children and young people. At least one Interview question should cover safeguarding in all interviews.
- explain any employment undertaken with previous surnames.
- Lastly, whilst in UK the following would not be discussed - For an overseas position there may be personal issues which need to be explored e.g. are there any relationship issues which need to be clarified since there may be regulatory issues to be addressed if in an unmarried relationship; there may be visa issues for a non-teaching partner; will children be accompanying (if so, are places available in the school?); might there be a visa issue regarding someone's age; etc.

Further guidance around Interview structure, questions and the interview process can be found within the 'Orbital Recruitment - Practice Guidance for Schools' document.

6. Pre-Employment Checks - References, Employment history & Background checks

References & Employment History

Where possible, references should be taken up before the interview stage, so that any discrepancies can be proved during the selection stage. If this is not possible, they **MUST** be completed prior to starting employment to ensure safer recruitment.

A minimum of two, and ideally three, references will be sought directly from the referees. One of these references must be from the candidate's most recent employer, i.e., the Principal (or college if NQT). In some circumstances it is understandable a candidate may not be comfortable taking up a reference from their current employer prior to knowing if they have been successful. In this case, current employment reference can be left until after an offer is made, as long as i) any offer is clearly marked

'subject to satisfactory references' & ii) references from two employers, immediately preceding their current employer, are obtained.

References must be sought from each candidate's direct line manager. They should not be accepted from colleagues, peers, or other managers whom the individual did not directly report to.

Open references or testimonials provided by the candidate must never be accepted as an alternative to direct contact with a referee / previous Line Manager.

Schools may well have their own format for references but attached as Appendix A is a proforma which details the minimum requirements required to be asked.

Referees must be contacted by telephone/e-mail by the Principal or his/her authorised representative. This personal contact with the referee is vital to clarify any anomalies or discrepancies and offer an opportunity for further details.

A detailed written note will be kept of such exchanges and attached to the application form. For senior positions and in exceptional cases, the Principal and/or deputy should do this and not admin since some referees might not wish to discuss references with admin staff.

Referees should always be asked specific questions about:

- the candidate's suitability for working with children and young people
- any disciplinary warnings, including time-expired warnings, which relate to the safeguarding of children
- the candidate's suitability for this post
- reasons for leaving previous posts
- would the referee re-hire the candidate

Any concerns about information obtained from referees must be discussed with the school's RHOS/Group Head of HR- who must review and approve any appointment where there are any such concerns raised.

The Social Media search may also be conducted prior to interview so that any relevant issues can be discussed with the candidate.

Background Checks - Identity, Criminal Record & Police Checks

All successful applicants are required at interview or prior to appointment:

- to provide proof of identity – passport is ideal here since the expiry date should be checked to ensure there is sufficient time left to apply for a work visa
- to provide their Birth Certificate
- to provide a satisfactory police certificate from their last country of residence and **for at least the previous five years of employment** – DBS/ICPC or whatever is available in their last country of employment (a new DBS/ ICPC will be applied for where relevant upon an offer being made)
- apostilled academic qualifications confirming approval to teach. Originals must be presented prior to appointment/on arrival

- proof of address in current and home country should have been checked prior to interview
- to complete a confidential health questionnaire/fit for work declaration if requested
- confirm that to the best of their knowledge, they can apply successfully for a work visa if needed in the country of employment
- UK-trained and -qualified teachers should be able to provide a DFE/DES/ GTC number. This should confirm the veracity of the qualifications i.e., confirming when and where they say they attended.

(NOTE: Any difficulty in providing a Police Report/ certificate **must** be discussed with the school's RHOS, Group Head of HR or Head Office Lead on Safeguarding).

A national rather than regional report which relates directly to working with children should be obtained wherever possible.

It is the responsibility of the candidate to obtain and submit to the prospective employer such declarations.

NOTE: When teachers have indicated they will be leaving our schools they should be advised to obtain an up-to-date Police Report/ certificate they can present to any future employer prior to leaving the country. This is as it can be much more difficult to obtain once they have left.

Any offer of a job must be made clearly conditional on all the above being satisfied along with satisfactory references.

Prohibition checks via COBIS and ACRO

All schools are now registered with COBIS to use their services to obtain Prohibition Order check <https://www.cobis.org.uk/services/safeguarding-in-schools/safer-recruitment/prohibition-order-checks>.

At the very least, schools should check the Teacher Regulation Agency/ Teacher misconduct website <https://www.gov.uk/government/collections/teacher-misconduct> (or equivalent in other countries e.g., <https://crimecheckaustralia.com.au/the-importance-of-background-screening-for-teachers/>) for any UK trained or teachers that have worked in the UK that have been subject to a prohibition order.

Since the suspension of Enhanced DBS checks through COBIS, all *overseas applicants are required to obtain an ICPC, International Child Protection Certificate <https://www.acro.police.uk/icpc/>. Costs for the certificate are met by the candidate, **not the school**.

* The International Child Protection Certificate (ICPC) is a criminal record check for UK nationals, or non-UK nationals who have previously lived in the UK, looking to work with children overseas. Where this does not apply the applicant must present an equivalent from the country of origin and the last country where the applicant is resident.

When an offer is being made to:

- any teacher coming directly from the UK
- any candidate who has ever lived or worked in the UK, no matter what nationality

...the ICPC check should be started in accordance with the guidelines ACRO www.acro.police.uk

*In addition, for the above category of employee, a **Prohibition Check** should also be conducted through COBIS.*

If any information is disclosed on the ICPC certificate or through the Prohibition Check, this **MUST** be discussed with the school's RHOS, Group Head of HR or Head Office Safeguarding Lead prior to confirmation of appointment. A risk assessment will be made regarding how relevant or not any disclosure might be. Any correspondence and/or risk assessment will be recorded/ maintained by both the Principal and RHoS.

- If they have ever lived or worked in the UK, an Enhanced DBS check or ICPC check will be conducted prior to any appointment being made
- Whilst copies of documents are sufficient for the time being, *originals are required and will need to be seen at interview or prior to appointment* (where necessary e.g., visa requirement documents may need to be apostilled).

7. Maintaining Accurate Employee Records and the Single Central Record

On appointment, or as soon as is possible, all relevant information, including the individual's full name, role, start date, and personal information must be entered into Dynamics HR fields. Safeguarding evidence checks should also be detailed within relevant screens.

The importance of logging such information cannot be stressed too highly. Apart from being a crucial record for the school, the information is used by Head Office for a variety of purposes and should be an accurate record of people employed by the school and across the group.

The Single Central Record (SCR)

The SCR should contain details of all staff (teaching/non-teaching currently employed by the school) and School Board members.

We would expect the school to retain the information in staff files for at least three years after employment has ended in case the school needs to provide information to another employer, or in the event of a safeguarding investigation.

This document requires constant upkeep. **All entries should be dated and initialed by an approved HR representative (who has undertaken safer recruitment training) and regularly checked by the DSL and verified by the Regional Head of Schools/Group Lead for Safeguarding. We recommend at least once per term, as part of their regular termly meeting.**

The **Single Central Record (SCR)**, as a minimum, must have the following information:

- an identity check (passport **and** birth certificate) dates of checks and name of checker
- a barred list check
- an enhanced DBS/ICPC check/certificate, dates of check and name of checker
- *a prohibition from teaching check – see notes/ guidance above*
- a professional qualification check, dates of checks and name of checker
- a check to establish the person's rights to work in the United Kingdom/host country, dates of checks and name of checker
- further checks on people who have lived or worked outside of the UK

Other columns should include:

- medical checks
- reference checks and dates of checks and name of checker.
- training
- read and understood Keeping Children Safe in Education 2024 (part one)

This will be monitored by Head Office for Safeguarding purposes.

8. Commencing Employment & Induction

Commencing Employment

Once the offer has been accepted, full details need to be given to the successful candidate regarding any issues specific to the school e.g., how to obtain relevant visa; arrangements for finding suitable housing; how to set up a mobile phone; date expected to be in location for Induction prior to regular INSET days; guidance on how costs of flights are to be reimbursed etc. It is also useful to set up a "Buddy System" so that questions which might be important to the new member of staff, but they might feel embarrassed asking the Principal, can be addressed.

Once all background checks are complete, a visa is in place, and the new employee is able to travel to commence employment, your new appointment is able to join the school from their start date.

No new member of staff should begin employment until all checks have been conducted, recorded (or be in the process of being completed) and verified by a second recruiter. In extraordinary circumstances, where all documents have not been received, the Principal must consult the RHoS and agree on monitoring and supervision arrangements whilst awaiting final checks. **Until all checks have been received, at no time must a new member of staff be unsupervised in regulated activity.**

Upon arrival, the new starter should be met at the airport and taken to either a hotel for a temporary period whilst finding an apartment or to their actual apartment where there should be a “Welcome Pack” of necessities waiting.

Prior to any regular organised INSET, staff who are new to the school should receive induction training which will include a variety of issues relating to school operations, domestic issues such as opening a Bank Account etc.

There are certain documents which the new starter must receive as a minimum. These include.

- Copy of the School's Staff Handbook including Code of Conduct, Disciplinary and Grievance procedures
- Copy of Child Protection procedure and any other Safeguarding policies
- Copy of Keeping Children Safe in Education September 2024
- Copy of Health and Safety policy including Evacuation and Lockdown procedures

Induction

Regular meetings should be held during the first three months of employment between the new employee(s) and the appropriate manager(s).

All new staff must complete courses on Child Protection, Anti-Bullying, Online Safety and Mental Wellbeing in children and young people course as soon as possible – currently we are using TES Develop (formerly EduCare) or The National College, which is available across a number of schools.

Even though references have been obtained and confirmed and Police Reports provided, schools still need to be vigilant, and behaviour should still be monitored carefully, especially during the early period of employment. The quality of Police Reports can vary from country to country. It should be remembered that any Police Report is unlikely to contain information about offences committed outside of that country and is not likely to contain information about arrests made which did not lead to conviction.

9. Using agencies – to support difficult to recruit posts

Schools should seek to identify and appoint quality new recruits internally from within the group, through open advertising, or through existing talent pools identifying strong candidates. Although we recognise that specialist recruitment agencies may assist recruitment where quality candidates prove difficult to find.

Great care must be taken when using agencies. Some are more efficient and robust in their checking procedures than others. **Schools and Local HR departments should refer to the ‘Orbital Recruitment - Practice Guidance for Schools’ document, which details recruitment agencies who should be approached in preference to other recruiters due to their positive success rates and robust background checking.**

Other agencies may be used providing their cost and terms are similar to preferred recruiters, and use is approved by the School Principal and Local HR. Although the school must exercise caution when using new recruiters to ensure they are competent, effective, and candidates are rigorously checked.

Irrespective of any checks carried out by an agency, any candidate offered a position with your school **MUST** still go through the Group checks detailed above prior to any offer being made. **It is not sufficient to rely on agency checks.**

Agencies should only be used in limited circumstances, where the cost of agency recruitment is within budget, ordinary recruitment processes are not able to yield a sufficient quality or quantity of applicants and/or there are time pressures for recruitment, and use is approved by the School Principal. Where the cost of agency use is not covered within the school's recruitment budget, it must be expressly agreed and approved in advance by your Regional Head of Schools and Group Head of HR.

See the 'Orbital Recruitment - Practice Guidance for Schools Document' for a list of preferred agencies which can be used.

Safer Recruitment of other Individuals – Contractors, Volunteers, Board Members

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the company has had the appropriate level of DBS/ ICPC/ police check, consistent with the approaches adopted for employees. This will usually be:

- The appropriate legal documentation/ confirmation from the contractor that all employees have been subject to a 'clear' police check.
- Although additional checks may also be required / carried out, depending upon the type of work undertaken, relevant risk assessment for the work and potential contact with children.

For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity.
- Obtain an enhanced DBS/ ICPC/ police check with barred list information for all volunteers who are new to working in regulated activity.

Carry out a risk assessment when deciding whether to seek an enhanced DBS/ ICPC check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment.

Board members

All Board members have enhanced DBS/ police check without barred list information. They will have an enhanced DBS check with barred list information if working in regulated activity.

Other Individuals with contact with Children i.e./Students staying with host families.

Where any arrangements are made for students to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced police checks on those people.

Where the company/ school is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will collaborate with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit.