



**KENT COLLEGE
DUBAI**

Safer Recruitment Policy 2022/23

Kent College Dubai

Approved by Principal:	Anthony Cashin	Date: 1 December 2020
Approved by KCD Board Representative :	Tony Elzoghbi	Date: 1 December 2020
Last reviewed on:	August 2022	
Next review due by:	August 2023	

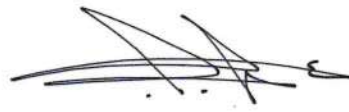
KCD Authorised Stamp



I acknowledge that I have read, understood and accepted ownership of this policy document and at the next formal review, the below signatories will replace those named above.



Jared Nolan, Principal, Kent College Dubai



Shafiq Khoory, Board of Governors
member with responsibility for
safer recruitment



Rationale

As a COBIS member and an organisation that ensures it follows best practice at all times, we follow the Safer Recruitment guidance as outlined in the latest version of the DfE document [Keeping Children Safe in Education](#). The school principal, the designated safeguard leads (across both Junior and Senior schools) all members of SLT and HR undertake Safer Recruitment Training every two years. The designated safeguard leads update the Safer Recruitment Policy annually in line with best practice as per the [Keeping Children Safe in Education](#). In addition, the designated safeguard leads refresh their Advanced Child Protection and Safeguarding Training every two years.

We acknowledge that it is vital for schools to create a culture of safer recruitment and safeguarding practice and, as part of that, adopt recruitment procedures that help discourage, reject, or identify adults who might cause harm to children, making this policy one of our most important policies across the school.

Disclosure and Barring Service

International schools based overseas are not able to request Standard or Enhanced DBS checks for its employees. The legislation which permits schools to ask about spent criminal convictions (the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975) applies only to recruitment decisions which are being made in England and Wales, and not to recruitment decisions which are made in other jurisdictions.

International Child Protection Certificate (ICPC)

Kent College Dubai now uses the [ICPC](#) to access information about UK nationals, or non-UK nationals who have previously lived in the UK, and who wish to work with children abroad.

Adults applying to work at Kent College Dubai are required to apply directly for an ICPC. They can apply online, stating the name of the school in which they will be employed (Kent College Dubai is a registered school with ACRO). Applicants applying from Scotland should apply through [Disclosure Scotland](#).

The member of staff in charge of teacher recruitment, should request that applicants provide this proof before commencing any form of work at the school.

All offers of employment are dependent on a satisfactory ICPC certificate (if the candidate has ever lived and/or worked in the UK), in addition to this, a police clearance certificate from domicile country and/or last country of residence in the last 5-year period is required.

- [UAE police clearance certificate](#)
- [Criminal background checks for potential candidates](#) (CIS documentation)

Internal Process Prior to Recruitment

Prior to the commencement of the recruitment process, a [staff recruitment requisition form](#) should be completed by the Head of Juniors/Head of Seniors sent to the HR Manager and then to be further approved by the Bursar and Principal.

The Bursar and Principal will study this request, usually having had a discussion at the Senior Leadership Meeting surrounding the need for the position, by taking into consideration school requirements and any subsequent budgetary constraints/concerns. From this the position will either be approved or denied. After the Principal and Bursar have given the approval, it will be sent to the Governor and MHK for final approval.



Once approved by all parties, the recruitment process will start.

Pre-appointment Checks

Any offer of employment made to a successful candidate, including one who has lived or worked abroad, must be conditional on satisfactory completion of the necessary pre-employment checks.

At Kent College Dubai, we will make every effort to adhere to the [Screening and Assessment Practices for International School Recruitment Document](#) as referenced by the [International Task Force on Child Protection](#) resources page.

In line with Keeping Children Safe in Education 2022 Kent College Dubai will also:

- Validate a candidate's identity using the identification checking guidelines found on the GOV.UK website or via methods most appropriate to the UAE
- obtain via support from COBIS (via the applicant) a DBS certificate if possible (including barred list information, for those who will be engaging in regulated activity)
- try to obtain a separate children's barred list check if an individual will start work in regulated activity before the DBS certificate is available
- try to verify the candidate's mental and physical fitness to carry out their work responsibilities. A job applicant can be asked relevant questions about disability and health in order to establish whether they have the physical and mental capacity for the specific role
- verify the person's right to work in the UAE. If there is uncertainty about whether an individual needs permission to work in the UAE, then prospective employers, or volunteer managers, should follow advice on the GOV.UK website
- make any further checks especially if the person has lived or worked outside the UK
- verify professional qualifications, as appropriate, by requesting attested transcripts of applicants' degree certificates and their Qualified Teacher Status
- While there is no requirement, Kent College Dubai will still ask for an enhanced DBS certificate or carry out checks for events that may have occurred outside the UK if, in the three months prior to their appointment, the applicant has worked:
 - in a school in England in a post which brought them into regular contact with children or young persons in any post in a school since 12 May 2006; or
 - in an institution within the further education sector in England or in a 16-19 Academy, in a post which involved the provision of education which brought the person regularly into contact with children or young persons

The Teachers' Disciplinary (England) Regulations 2012 define teaching work as:

- planning and preparing lessons and courses for pupils;
- delivering lessons to pupils;
- assessing the development, progress and attainment of pupils;
- and reporting on the development, progress and attainment of pupils

Where possible Kent College Dubai will also use the Teacher Services' system to ensure that a candidate to be employed as a teacher is not subject to a prohibition order issued by the Secretary of State.



Where an enhanced DBS certificate can be acquired, it will be obtained from the candidate prior to, or as soon as practicable after, the person's employment at the school.

Employment History and References

Kent College Dubai will always ask for written information about previous employment and will check that the information provided on application forms is not contradictory or incomplete. In alignment with the expectations of COBIS we require two references on professional letter headed paper for each applicant or through the TES recruitment system, once the referees email addresses have been validated. In some cases, these may be verified by a follow up telephone call, signed, and dated by the person checking the reference.

References are requested before all short-listed candidates are interviewed. This process enables those conducting the interview to identify and raise any issues or concerns further with the referee and later, if required, with the candidate at interview.

The purpose of seeking references is to obtain objective and factual information to support appointment decisions. References are always obtained, scrutinised and any concerns resolved, before the appointment is confirmed. References are always requested directly from the referee. Where possible, open references are not accepted, for example in the form of 'to whom it may concern' testimonials. If a candidate for a teaching post is not currently employed as a teacher, we will look to check with the school, college, or local authority at which they were most recently employed, to confirm details of their employment and their reasons for leaving.

On receipt, references are checked to ensure that all specific questions have been answered satisfactorily. The referee is contacted to provide further clarification as appropriate: for example, if the answers are vague. They are also compared for consistency with the information provided by the candidate on their application form. Any discrepancies are taken up with the candidate at the point of interview.

Any information about past disciplinary action or allegations are considered carefully when assessing the applicant's suitability for the post.

An offer of employment will only be made once Kent College Dubai is satisfied that all reference checks have been completed.

The Interview Process

When conducting an interview, Kent College Dubai will always ensure that there are at least two members of staff on an interview panel. At least one member of the panel will have completed the Safer Recruitment Training (within the last 2 years). Kent College Dubai recognises that it is good practice to interview people face-to-face, however, due to current government restrictions, we consider a flexible approach to interviews using Google Meets/Zoom where necessary. Where face-to-face interviews are conducted, all necessary COVID-19 guidelines are in place.



Prior to interviews, a list of core interview questions are generated. In addition to this, notes are taken and any extra questions that have come about as a result of what applicants have said on their application form or what the referees have said will be addressed.

Where possible, hypothetical questions are avoided and questions based on an applicant's actual experiences are made a priority. Applicants are asked to provide concrete examples of their competency enabling the interview panel to delve into applicants' attitudes and behaviours, as well as their motivations for working with children and young people.

Safeguarding is of course Kent College Dubai's number one priority, which is why the interview panel will make a point asking all candidates "*What do you feel is paramount when working in a school?*" Kent College Dubai, feels all candidates should be answering such a question in relation to the safeguarding, protection and safety of all children. Should applicants however not provide a satisfactory answer, the interview panel will probe further to ensure that the candidate has a good understanding of safeguarding.

The interview panel will document all the answers each candidate gives, retaining them for reference purposes when they discuss all the candidates after the interviews are completed.

Single Central Record (SCR)

Kent College Dubai is required to keep a single central record.

The single central record covers all staff who work at the school and all members of the governing body. The information that is recorded in respect of staff members is whether the following checks have been carried out or certificates obtained, and the date on which each check was completed/certificate obtained:

- an identity check (visual, passport and attested birth certificate)
- a barred list check
- an enhanced DBS check/certificate (where available)
- an ICPC certificate
- a prohibition from teaching check
- further checks on people living or working outside the UK or the UAE
- a check of professional qualifications
- [UAE police check](#)
- references received
- a check to establish the person's right to work in the UAE
- a section 128 for those working in a senior management capacity

Where checks are carried out on volunteers, we also record this on the single central record.

While we do not have to keep copies of DBS certificates in order to fulfil the duty of maintaining the single central record, we may choose to retain a copy sometimes for longer than the six months as required under the Data Protection Act in the UK.



ICPC certificate copies are retained to demonstrate safer recruitment practice for the purpose of safeguarding audits.

Individuals who have lived or worked outside the UK

Individuals who have lived or worked outside the UK must undergo the same checks as all other staff at Kent College Dubai. In addition, we make further checks we think appropriate so that any relevant events that occurred outside the UK can be considered. This includes police checks from all countries in which the individual may have lived/worked 5 years prior to working at Kent College Dubai; as well as a local police check, if the individual has resided in the UAE for more than 6 months.

Agency and third-party staff

Where possible, Kent College Dubai obtains written notification from any agency, or third-party organisation (e.g. Just Play or Mastercook) that they have carried out the necessary checks (in respect of the enhanced DBS certificate) on an individual who will be working at Kent College Dubai.

Where the position requires a barred list check, this must be obtained, by the agency or third-party prior to appointing that individual. The school must then carry out an identity check to verify that the person presenting themselves for work is the same person on whom the checks have been made.

Trainee/student teachers

Where a student teacher is on placement with Kent College Dubai, we must ensure that all necessary checks are carried out. As trainee teachers are likely to be engaging in regulated activity, an enhanced DBS certificate (including any barred list information) must be obtained where possible. We are currently working with the University of Birmingham and have asked them to ensure either DBS and/or ICPC are obtained in addition to local police checks.

Existing staff

If we have concerns about an existing staff member's suitability to work with children, we will carry out all relevant checks as if the person were a new member of staff. Similarly, if a person working at the school moves from a post that was not regulated activity, into work which is regulated activity, the relevant checks for the regulated activity are carried out. Apart from these circumstances, the school or college is not required to request an ICPC or DBS or barred list check.

Volunteers

Under no circumstances is a volunteer in respect of whom no checks have been obtained be left unsupervised or allowed to work in regulated activity with children.

We understand that volunteers who on an unsupervised basis, teach or look after children regularly or provide personal care on a one-off basis at Kent College Dubai will be in regulated activity. Where possible we will obtain an enhanced DBS certificate (which should include barred list information) for all volunteers who are new to working in regulated activity. Existing volunteers in regulated activity will not be re-checked if they have already had a DBS check (which includes barred list information). However, we may conduct a repeat DBS check (which should include barred list information) on any such volunteer if we have concerns.



Often, we will not be able to obtain a DBS check and in these instances, we will need to rely upon local police checks.

We will undertake a risk assessment and use our professional judgement and experience when deciding whether to seek an ICPC or enhanced DBS check for any volunteer not engaging in regulated activity. In doing so we will consider:

- the nature of the work with children;
- what we know about the volunteer, including formal or informal information offered by staff, parents and other volunteers;
- whether the volunteer has other employment or undertakes voluntary activities where referees can advise on suitability;
- whether the role is eligible for an enhanced DBS check

School Governors

Governors who are volunteers are treated on the same basis as other volunteers, that is, an enhanced DBS check (which will include a barred list check) should only be requested if the governor will be engaging in regulated activity. Governing bodies can request an ICPC or enhanced DBS check without a barred list check on an individual as part of the appointment process for governors. Again, the enhanced DBS check can only be requested for UK nationals operating in the UK.

Contractors

Where possible, Kent College Dubai will ensure that any contractor, or any employee of the contractor, who is to work at the school has been subject to the appropriate level of DBS check or local police checks. Contractors engaging in regulated activity will require an ICPC or enhanced DBS certificate (including barred list information) or local police checks. For all other contractors who are not engaging in regulated activity, but whose work provides them with an opportunity for regular contact with children, an ICPC or enhanced DBS check (not including barred list information) will be required or a local police check.

Under no circumstances should a contractor in respect of whom no checks have been obtained be allowed to work unsupervised or engage in regulated activity. We are responsible for determining the appropriate level of supervision depending on the circumstances.

Kent College Dubai will always check the identity of contractors and their staff on arrival at the school.

Visitors

Kent College Dubai does not have the power to request background checks on visitors (for example children's relatives or other visitors attending a sports day). The Principal will use professional judgement about the need to escort or supervise visitors.