Group Safer Recruitment Policy

Policy Owner: Group Head of People Operations and Group Head of Operational Risk

Revised: October 2026
Next review due: October 2027

RATIONALE

This policy has been developed to embed safer recruitment practices and procedures throughout ISP, our regions, schools and offices and to support the creation of a safer culture by reinforcing our responsibility for the safeguarding and wellbeing of all children and young people in our care.

This policy has been endorsed by the ISP Executive Committee (ExCo) and Senior Management Team (SMT) and will be reviewed regularly and at least on an annual basis to ensure it continues to be in line with considered best practice.

This policy reinforces the expected conduct outlined in our Code of Conduct as well as our Child Protection and Safeguarding Policy with which all employees are expected to be familiar with. All successful candidates for paid or volunteer employment will be made aware of these documents.

This policy is an essential element in creating and maintaining a safe and supportive environment for all students, employees and others within the ISP community and aims to ensure both safe and fair recruitment and selection of all employees and volunteers by:

- attracting the best possible candidates/volunteers to vacancies
- deterring prospective candidates/volunteers who are unsuitable from applying for vacancies
- identifying and rejecting those candidates/volunteers who are unsuitable to work with children and young people early in the recruitment process.

We are committed to using procedures that deal effectively with those adults who fail to comply with our safeguarding and child protection procedures and practices.

Any abuse against an employee will be dealt with in accordance with local guidance or law and will be reported to the relevant Regional Managing Director. ISP guidance will be followed if any ISP or school employee, volunteer or contractor has:

- behaved in a way that has harmed a child, or may have harmed a child
- possibly committed a criminal offence against or related to a child
- behaved towards a child or children in a way that indicates he or she will pose a risk of harm if they work regularly or closely with children
- accessed inappropriate websites or online content
- held inappropriate conversations either about children or in the proximity of children

As an employer in a child centred business, we have a responsibility to safeguard all children that may come into contact with a previous employee, contractor or volunteer who has been dismissed or resigns because of misconduct towards a child. Therefore, in consultation with the Group Head of Operational Risk, regions and schools must report to relevant authorities in their area any such behaviours and ensure such behaviours are reported in any reference applied for by future employers.

DIVERSITY, INCLUSION, EQUITY AND BELONGING

Together we are committed to creating and nurturing a safe, welcoming, inclusive, equitable and diverse community, representative of and responsive to different cultures and groups and where each of us has the chance to thrive, contribute and do what we do best.

We recognise and value the benefits of a diverse team and we are continuously seeking to improve our recruitment strategies to ensure that they reach and appeal to candidates, whether internal or external, regardless of gender, ethnicity, sexual orientation and gender expression, age, disability status, neurodivergence, socio-economic background or other demographic characteristics.

At ISP:

- We treat everyone with care and respect, looking after one another, embracing similarities and differences and promoting the wellbeing of each other
- We are friendly and, crucially, we listen and act accordingly
- We have the sensitivity, awareness and skill to understand the values, attitudes and practices across cultures that support each other to learn and work effectively

ROLES AND RESPONSIBILITIES

The Group Head of People Operations and Head of Global Talent Acquisition will:

- ensure the safe and fair recruitment and selection of employees at central and senior levels of ISP
- ensure that appropriate employees at all levels have completed safer recruitment training and repeat this annually.

The Group Safer Recruitment Manager will:

- promote, oversee and monitor Safer Recruitment across the ISP Group, nurturing and embedding the organisational culture and conditions to ensure that only those suitable to work with children and young people join ISP.
- Create, update and deliver Safer Recruitment training, webinars, other learning experiences and the Safer Recruitment toolkit.
- Conduct safer recruitment reviews across all schools and regional offices and provide accurate overviews of the safer recruitment culture in schools and regions.

The Regional Managing Director will:

- ensure the region and schools have effective procedures in place for the safe and fair recruitment and selection of employees, contractors and volunteers.
- monitor compliance and ensure these do not breach local laws.
- ensure that appropriate employees have completed safer recruitment training and repeat this annually.
- conduct SCR spot checks to assess safer recruitment procedures when visiting schools and to require deeper checks / reviews of processes and procedures where necessary.

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The Regional Head of HR will:

- be the regional expert in safer recruitment best practice and procedures.
- together with the RMD and Principals/ Heads of Schools, HR Business Partners, school HR and our Global Outsourced Service Provider ensure the region and schools comply fully with ISP's procedures for the safe and fair recruitment and selection of employees, contractors and volunteers.
- ensure ISP HR and our Global Outsourced Service Provider have the necessary training, support and guidance to carry out the safer recruitment processes and procedures effectively.
- lead on the onboarding of new schools and new Heads of Schools and other leaders from a safer recruitment perspective.
- conduct SCR spot checks to assess safer recruitment procedures and require deeper checks / reviews of processes and procedures where necessary.
- monitor compliance and ensure these do not breach local laws.
- ensure that appropriate employees have completed safer recruitment training and repeat this annually.

The Head of School will:

- ensure the school has effective procedures in place for the safe and fair recruitment and selection of employees, contractors and volunteers and that these are reviewed on a regular basis to ensure that they meet local laws.
- ensure that all appropriate checks have been carried out on employees, contractors and volunteers in the school.
- together with HR Business Partners/school HR and our Global Outsourced Service Provider review all new starter documentation and sign off all new starters on the Single Central Register to confirm that all new appointments are safe to be in their school.
- together with HR Business Partners/school HR, check and assess any supporting documents such as risk assessments and exemption forms are completed as fully and accurately as possible.
- Conduct SCR spot checks to assess safer recruitment procedures and require deeper checks / reviews of processes and procedures where necessary.
- monitor third party and agency compliance safer recruitment practices.
- promote the safety and wellbeing of children and young people at every stage of the safer recruitment process.

HR Business Partners / School HR will:

- Provide ongoing advice, guidance and training to schools and our Global Outsourced Service Provider on Safer Recruitment requirements, including policy and legislative updates.
- Monitor and quality assure compliance across schools, including regular reviews of recruitment processes, records and the Single Central Record (SCR).
- Identify gaps, risks and recurring issues, providing targeted support, training and corrective actions where required.
- Provide advice and escalation support for complex or exceptional cases and work with the Global Outsourced Service Provider to address issues and ensure agreed service standards are met.
- Share learning and best practice and provide assurance to relevant stakeholders on the effectiveness and overall compliance of Safer Recruitment processes across the region.

The Global Outsourced Service Provider will:

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- Review the candidate's CV/application form for any gaps, inconsistencies or unexplained periods and ensure these are addressed during the recruitment process. Where appropriate, ensure references or other supporting evidence are obtained to address any gaps before appointment.
- Review the candidate's CV/ application form and determine which criminal background checks/police checks are required in accordance with Safer Recruitment policy
- Conduct, or oversee, the required online search in line with ISP Safer Recruitment guidance and ensure any concerns or questions identified are appropriately explored during the interview process.
- Review and scrutinise references to ensure they are relevant, meaningful and satisfactory, with no unexplained adverse comments or inconsistencies. Any concerns identified must be followed up with the applicant and/or referee before a start date is confirmed.
- Highlight any missing information, escalate discrepancies, adverse findings or incomplete checks to ISP HR for review and appropriate action.
- Escalate any checks that cannot be completed, or any exceptions identified, to ISP HR so that the appropriate risk assessment, exemption or management decision can be made.
- Ensure that the recruitment decision and any identified risks or exceptions are appropriately documented and approved before the candidate commences employment.
- Support ISP HR with the completion and maintenance of the Single Central Record (SCR), in line with the agreed process, ensuring that information provided for recording is accurate and timely.
- Retain, manage and store safer recruitment documentation in accordance with ISP requirements, data protection legislation and agreed records-management procedures

INVITING CANDIDATES

All advertisements, paid or unpaid, will include the following statement:

"This school is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. All post holders are subject to appropriate vetting procedures, including an online due diligence search, references and satisfactory Criminal Background Checks or equivalent covering the previous 10 years employment history."

All vacancies in ISP and our schools are managed through our Applicant Tracking System in Workday. Every time a new vacancy arises a requisition must be created in Workday, and the required details below must be completed. Internal and external candidates will use our careers sites to search for vacancies and access relevant information on roles available.

The ISP Application form and supporting information will be accessible within Workday and consists of three main sections:

Section 1
The role profile / job description and person specification will be shown on the requisition details

Section 2
Explanatory notes on how the requirements of each role will be tested and assessed during the selection process. Details of this will also be included on any invites to interview attendees. For example:

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'in addition to candidates' ability to perform the duties of the post, the interview will also explore issues relating to safeguarding and promoting the welfare of children including their:

- motivation to work with children and young people;
- ability to form and maintain appropriate relationships and personal boundaries with children and young people;
- emotional resilience in working with challenging behaviour;
- attitudes to use of authority and maintaining discipline;
- any relevant information about the organisation and the recruitment process, and other relevant policies such as the Child Protection and Safeguarding Policy;
- any specific terms and conditions relating to the post;
- general policy and practice in relation to safeguarding and promoting welfare'

Safeguarding interview questions will be tailored to the nature of the role, distinguishing between teaching and non-teaching posts, to ensure each candidate is assessed against the safeguarding responsibilities relevant to the position.

Section 3

The application process also makes it clear to potential candidates that:

- 10-year background checks will be required for all posts (this is included on all applications as standard).
- we will seek references on short-listed candidates and may approach previous employers for information to verify experience or qualifications before interview.
- If the applicant is currently working with children, on either a paid or voluntary basis, their current employer will be asked about disciplinary offences relating to children, including any in which the penalty is "time expired", (e.g. where a warning could no longer be considered in any new disciplinary hearing) and whether the applicant has been the subject of any child protection concerns, and if so, the outcome of any enquiry or disciplinary procedure. If the applicant is not currently working with children but has done so in the past, then contact will be made with that employer who will be asked about these issues;
- Providing false information is an offence and could result in the application being rejected or summary dismissal if the applicant has been selected and referral to the police.

A curriculum vitae will not be accepted in place of a completed application form.

IDENTIFICATION OF THE RECRUITMENT PANEL

All members of the selection and recruitment panel will have successfully completed training in safer recruitment within the last year via The Learning hub.

SHORTLISTING AND REFERENCES

Candidates will be shortlisted against the person specification for the post. Shortlisting should be carried out by a minimum of two-person panel, all of whom will have undergone safer recruitment training.

At least two references, covering a minimum of three years, one of which must be from the applicant's current/most recent employer where possible, will be taken up before the selection stage so that any discrepancies may be probed during this stage of the procedure (note references

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should come from the line manager of the previous organisation, not a colleague, and should be sent from a professional email address).

References will be sought directly from the referee, and where necessary, will be contacted to clarify any anomalies or discrepancies. Detailed written records will be kept of such exchanges. Where possible references will be requested in advance of interview.

Where necessary, previous employers who have not been named as referees may be contacted in order to clarify any such anomalies or discrepancies. Detailed written records will be kept of such exchanges.

Referees will be asked specific questions about the following:

- The candidate's suitability to work with children and young people, if applicable
- Any substantiated allegations
- Any disciplinary warnings, including time-expired warnings, relating to the Safeguarding of children and young people
- The candidate's suitability for the post.

Reference requests will include the following:

- Applicants current post and salary
- Attendance record
- Disciplinary record

All appointments are subject to satisfactory references, vetting procedures and criminal background checks.

INVITATION TO INTERVIEW

Candidates called to interview will receive:

- An email confirming the interview and any other selection techniques
- Details of the interview day including details of the panel members
- Further copy of the person specification
- Details of any tasks to be undertaken as part of the interview process
- The opportunity to discuss the process prior to the interview
- Be asked to provide proof of identity

THE SELECTION PROCESS

Selection techniques will be determined by the nature and duties of the post, including the use of artificial intelligence, adhering to relevant laws and legislation. Vacancies will require an interview of short-listed candidates.

Interviews will, where possible, always be face-to-face and may include additional interview techniques such as observation or exercises. Where this is not possible, an initial online interview will be conducted, followed by a face-to-face meeting with shortlisted candidates.

Candidates will be required to:

- Explain any gaps in employment
- Explain satisfactorily any anomalies or discrepancies in the information available to the panel
- Declare any information that is likely to appear on the Criminal Background check or equivalent.

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- Demonstrate their ability to safeguard and protect the welfare of children and young people and their ability and willingness to promote the ISP/School core values.

EMPLOYMENT CHECKS

An offer of appointment will be conditional, and all successful candidates will be required to:

- Provide proof of identity
- Provide Criminal Background Checks or equivalent covering any country they have lived and worked in during the last 10 years.
- Provide proof of professional status
- Provide actual certificates of qualifications
- Complete a confidential health questionnaire [in countries where this is permitted]
- Provide proof of eligibility to live and work in the country of employment

The above must be included in the conditional offer letter clearly stating that failure to comply will result in the offer being withdrawn.

All checks will be:

- Confirmed in writing
- Documented and retained on the personnel file
- Recorded on the school's Single Central Register
- Followed up if they are unsatisfactory or if there are any discrepancies in the information received.

Employment will commence subject to all checks and procedures being satisfactorily completed.

In exceptional circumstances a risk assessment complete with action plan can be put in place to ensure the employee is supervised until all checks are in place, this **must** have final approval from the Regional Managing Director or Group Head of People Operations before employment begins.

Any failure to follow this process will be handled via the appropriate local disciplinary procedure.

ONBOARDING

All employees and volunteers who are new to the school will receive information on the school's safeguarding policy and procedures and guidance on safe working practices which would include guidance on acceptable conduct/behaviour. These expectations will form part of new employees' onboarding training.

All successful candidates will undergo a period of onboarding and will:

- Meet regularly with their onboarding tutor; or
- meet regularly with their line manager; and
- attend appropriate training including generalist child protection training.

Staff should also sign to confirm that they have received and understood school policies and trainings and a record of this should be kept on file.

SUPPLY STAFF

All supply staff will be subject to the 10-year background checking policy and referencing process and will be required to complete the generalist safeguarding training.

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CONTRACTORS/VOLUNTEERS

All contractors/volunteers engaged directly by ISP / the school will be subject to the 10-year background checking policy and referencing process and will be required to complete the generalist safeguarding training.

THIRD PARTY/OUTSOURCED STAFF

The third-party company will be required to provide a current criminal background check or equivalent for the country they are working in for every member of their staff working in the school and are to be updated every 3 years, Staff working in the school will complete the generalist safeguarding training.

SINGLE CENTRAL REGISTER (SCR)

All adults working regularly in the school, whether or not they are employed, directly engaged contractors, extra curricula staff or visitors that are regularly working with children (regularly means at least once a week) e.g. parents who may read with children once a week will be on an SCR

All ISP employees and direct contractors will be listed in Workday and will therefore appear in the Extend SCR. All employees and direct contractors must be added to Workday and have their records completed prior to their commencement date. Third party contractors and regular volunteers are listed separately.

It is the responsibility of the Heads of School, HR and Hiring Managers to ensure that all such adults are vetted and checked in line with Safer Recruitment Policy.

APPENDIX

EMPLOYEE BACKGROUND CHECKING GUIDANCE

ALL SUCCESSFUL CANDIDATES ARE REQUIRED TO consent to and undertake a criminal background check covering the ten years prior to their start date with the Company and will cover all countries of residence during that period (i.e. all countries they have lived, worked or studied in). Candidates are expected to facilitate this process and assist ISP or the school in obtaining what is necessary.

This process will be repeated every three years during an employee's employment with ISP or the school, to cover the previous three years of employment e.g. a teacher is employed in Abu Dhabi, during the recruitment process the 10-year checks will be provided, after three years of employment only a UAE check will be required, the full 10 years does not need to be repeated. In Spain, we can only accept the Sexual Offences Certificate which is the only valid certificate which enables individuals to work with minors. In the USA checks will be renewed every five years in line with general practice.

If an employee transfers to another ISP school, then the leaving school needs to provide certificate numbers and dates of certificates on record to the new school so that the 10-year process does not have to be repeated. Thereafter, they will need to repeat the process every three years. School HR/ Global Outsourced Service Providers will support the employee with this process and keep all results, records and documents secure and confidential and comply with local data protection laws.

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Useful advice on criminal background checks by country can be found on the following UK / Canadian websites:

- UK Guidance (countries A-F) https://www.gov.uk/government/publications/criminal-records-checks-for-overseas-applicants/countries-a-to-f-applying-for-a-criminal-records-check-for-someone-from-overseas
- UK Guidance (countries G-P) https://www.gov.uk/government/publications/criminal-records-checks-for-overseas-applicants/countries-g-to-p-applying-for-a-criminal-records-check-for-someone-from-overseas
- UK Guidance (countries Q-Z) https://www.gov.uk/government/publications/criminal-records-checks-for-overseas-applicants/countries-q-z
- Canada guidance – how to get a police certificate https://www.canada.ca/en/immigration-refugees-citizenship/services/application/medical-police/police-certificates/how.html

NB International schools should be asking any potential employee who has lived or worked in the UK to obtain an International Child Protection Certificate (ICPC). This can be obtained from this website https://www.acro.police.uk/s/ but it's important that it is the International Child Protection Certificate (ICPC) that is requested - *not the Police*

Reasonable costs associated with criminal background/police checks may be claimed back by the employee through the schools' expenses process.

In a minimal amount of cases certain country checks may be impossible to obtain once a candidate has left that country. The first point of action should be to ask the candidate if they have a previous background check dated within 6 months of them leaving. If they do, this can be accepted. If they don't, an exemption form should be completed and submitted for approval by the Head of School before being sent to the Regional Head of HR for review and final approval with the RMD. The exemption form should make clear the steps that have been taken in an attempt to obtain the check and why it is not possible to obtain it.

Contractors / Volunteers

Contractors/Volunteers engaged directly by ISP or the school are expected to comply fully with background checking and safer recruitment.

Third party/Outsourced staff

It is a requirement, and should be included in contracts, for all third-party companies with employees that are regularly working in and around students that local criminal background checks are carried every three years. It is the school's responsibility to obtain certificate numbers and dates from the company and carry out ad-hoc audits to ensure compliance.