



# **Safeguarding: Safer Recruitment Policy and Procedure**

**MIDDLE EAST**

September 2024

## HORIZON ENGLISH SCHOOL

| Contact names   |   | Contact Details  |
|---|---|--|
| Principal   | Nick Hart   | <a href="mailto:nick.hart@horizonschooldubai.com">nick.hart@horizonschooldubai.com</a>           |
| Designated Safeguarding Lead  | Asma Ahmad  | <a href="mailto:asma.ahmad@horizonschooldubai.com">asma.ahmad@horizonschooldubai.com</a>         |
| Deputy DSL  | Aislinn McCabe  | <a href="mailto:aislinn.mccabe@horizonschooldubai.com">aislinn.mccabe@horizonschooldubai.com</a> |
| Cog - Head of Facilities  | Najeem Hameed   | <a href="mailto:najeem.hameed@cognita.com">najeem.hameed@cognita.com</a>                         |
| School Improvement Partner  | Lizzie Varley   | <a href="mailto:Lizzie.varley@cognita.com">Lizzie.varley@cognita.com</a>                         |
| Regional Safeguarding Lead  | Kirsty Clark  | <a href="mailto:Kirsty.clark@cognita.com">Kirsty.clark@cognita.com</a>                           |
| Regional HR Director  | Phillipa Chakhtoura   | <a href="mailto:Phillipa.chakhtoura@cognita.com">Phillipa.chakhtoura@cognita.com</a>             |
| Regional IT Director  | Mohammed Al Ahmad   | <a href="mailto:mohammed.alahmad@cognita.com">mohammed.alahmad@cognita.com</a>                   |
| Director of Education   | Ian Wallace   | <a href="mailto:ian.wallace@cognita.com">ian.wallace@cognita.com</a>                             |
| Cog – Managing Director   | Martin Filkins  | <a href="mailto:Martin.filkins@cognita.com">Martin.filkins@cognita.com</a>                       |
| Cog – Head of HR  | Trinity Stewart   | <a href="mailto:trinity.stewart@cognita.com">trinity.stewart@cognita.com</a>                     |
| <b>Cognita (Proprietor)</b><br>Chief Executive Officer, Cognita Middle East | David Baldwin<br><br>Cognita Regional Office<br>Level 26, Media One Tower, Media City, Dubai, UAE | <a href="mailto:David.baldwin@cognita.com">David.baldwin@cognita.com</a>                         |

**SAFER RECRUITMENT KEY FACTS:** Cognita practices seven steps to safer recruitment.

### 1. Safer Recruitment Training

- a. NSPCC Safer Recruitment e-learning Online Portal *(to provide the interviewer with the context and knowledge to explore their safeguarding responsibility)*
- b. Face-to-Face Safer Recruitment Training delivered by Cognita Accredited Safer Recruitment Trainers

### 2. Role Profile and Advertisements

- a. Safeguarding commitment statement to be included in both Role Profile and Job advertisement *(to deter unsuitable personnel)*

### 3. Scrutinising, Shortlisting and Interviewing

- a. Application form *(to be used as main tool for scrutinising)*
- b. Internet search *(to gather any public domain information)*
- c. Gaps in employment history *(to be noted for further exploration)*
- d. Taking up references *(to verify previous experience)*
- e. Concerns from a reference *(to be noted for further exploration)*
- f. Invitation to interview *(to prepare applicants for interview)*
- g. Preparing for the interview *(Selection Process and Interview Panel)*
- h. Verify identity
- i. Verify professional qualifications
- j. Interview *(Scope of Interview, Outcome and Regrets)*

### 4. Offer letter and Contract of Employment *(specific reference is made to professional expectations to safeguard the company)*

- a. Terms and Conditions of Employment
- b. Probation
- c. Disciplinary and Performance Improvement Procedure
- d. Safeguarding Declaration

### 5. Background Checks *(in addition to pre-interview checks, the following ensure the person is who they state they are and complies with our safeguarding requirements)*

- a. Employment History
- b. Professional Qualifications
- c. References
- d. Identity check
- e. Right to Work in country
- f. Local Police Check
- g. Overseas criminal records checks *(if applicable)*
- h. Medical fitness
- i. Disqualification declaration *(if applicable)*

### 6. Recording and Monitoring New Starters *(to evidence all background checks have been completed and suitably returned)*

- a. SCRT – updated for all new starters
- b. New Starter Checklist *(to be completed and filed on personnel file)*
- c. Risk Assessment Form *(to be completed and filed on personnel file)*
- d. Annual Staff Declaration *(Safeguarding and Compliance Record)*
- e. Annual Disqualification Declaration
- f. Change of Employment

### 7. Probationary Period including Induction

- a. The schools' attitude and expectations regarding safeguarding are clearly articulated including personal behaviours and reporting lines for any concerns
- b. Required safeguarding training is completed during the probationary period (in accordance with the Regional Safeguarding Policy) Assess performance, conduct and final suitability for working with children in your school before confirming permanent appointment
- c. Assess performance, conduct and final suitability for working with children in your school before confirming permanent appointment

### 1. Purpose

- 1.1 The Safer Recruitment Policy explicitly details Cognita's position, standards and expectations associated with its commitment to safeguarding and promoting the welfare of children and expects all staff to share this commitment, wherever they work and in whatever role.

The Cognita approach to Safer Recruitment is informed by the UK Guidance on Safeguarding Children and Safer Recruitment in Education (2006), its replacement Keeping Children Safe in Education (September 2020), Disqualification under the Childcare Act 2018, the Independent Schools Regulatory Commentary for the Inspection of Schools (2020), Working Together to Safeguard Children (February 2019), the Hugh Davies QC; Southbank International School Recommendations (2014) and the Group benchmark of best practice for all its schools globally.

### 2. Applicability

- 2.1 The following policy and procedure must be used for the recruitment and selection of all staff throughout the Cognita Middle East Group of Schools.

### 3. Definitions and Scope

- 3.1 This Safer Recruitment Policy sets out our safeguarding responsibilities as an organisation recruiting staff to work with students and also provides group-wide, consistent, and best practice recruitment procedures.
- 3.2 This policy must be read by any member of staff who is actively involved in the recruitment and selection of staff or who has a lead role in the safeguarding/child protection of students in a school. These members of staff are deemed to be part of the "Cognita Recruitment Community".
- 3.3 For compliance purposes, a signed copy of this policy should be retained in the personnel file for record-keeping purposes of anyone who is required to have read, understood, and taken accountability for the contents of this document.
- 3.4 Safeguarding is an ongoing process and will continue throughout employment. Safer Recruitment is only the first step in the whole Safeguarding cycle and must be embraced as part of our wider commitment to Safeguarding and Child Protection.

### 4. Policy

- 4.1 Across the Cognita Group, we share a common objective to help keep students safe by contributing to:
- providing a safe environment for students to learn and
  - taking appropriate action to keep them safe (where a risk is identified)
- 4.2 Achieving this objective requires systems designed to:
- prevent unsuitable people working with students
  - promote safe practice and challenge poor and unsafe practice
  - identify instances where there are grounds for concern and take appropriate action
  - contribute to effective partnerships to provide services to students who may require third party intervention

- create a culture and environment where staff feel comfortable, if appropriate, to discuss matters outside of work, which may have implications for the safeguarding of students in the workplace.
- 4.3 Cognita continually implements strategies to ensure the best people are employed. The [Seven Steps to Safer Recruitment](#) have been created to deter and prevent unsuitable personnel from applying and/or being recruited. In order to achieve the aim, it requires the recruiting team, hiring managers, Heads of schools and any staff member deemed to be part of the Cognita Recruitment Community to adhere to the [Seven Steps to Safer Recruitment](#).
- 4.4 Hiring Manager's and school leaders must be clear about the expectations they place on staff, including where their relationships and associations both within and outside of the workplace (including online) may have implications for the safeguarding of students in school.
- 4.5 Due to the reliance on the recruiting team taking personal accountability, disciplinary action will be taken, which may include termination of employment, against any employee, who is found to have breached this policy.
- 4.6 When implementing Cognita's Safer Recruitment policy, the Recruiting Manager and schools will be mindful of and act in accordance with the regional Preventing Radicalisation Policy. By complying with safer recruitment best practice techniques as set out in this policy and by ensuring that there is an on-going culture of vigilance within our schools, we aim to promote a culture of tolerance and respect and minimise the risk of students and/or members of staff being drawn into terrorism.

### [Equal Opportunities](#)

- 4.7 Our policy is to treat job applicants and employees in the same way regardless of their gender, marital status, age, race, religion, pregnancy/maternity or disability and the sole criteria for selection or promotion will be an applicant's suitability for the role.
- 4.8 In turn, we expect our staff to recognise and respect the many different racial groups, religious cultures and languages represented by the children who attend our nurseries and schools, in order to help them to develop positive attitudes to diversity and to equip them to prevent them from being drawn into radicalisation.
- 4.9 Our curriculum and activities will aim to utilise the richness this brings to the classroom and our organisation.

### [Levels of Responsibility](#)

- 4.10 It is the Hiring Manager's responsibility to identify a vacancy, seek budgetary authority for the position and to produce a Role Profile for the role. Templates for Role Profiles are available on the Safer Recruitment Toolkit
- 4.11 The [vacancy must be added to the Recruitment Module on Cognita People, by completing a Requisition](#) and must be approved prior to any recruitment activity including advertising, engaging with external agencies, interviewing or making verbal or written job offers. This is to ensure the new position and recruitment costs are within the approved budget
- 4.12 There are a number of recruitment related activities which require personnel to sign the relevant Role Profile Addendum which clearly articulates the role and responsibility for which they are accountable.

- 4.13 Applicants or colleagues should never be informed of the outcome of the recruitment process until it has been completed.

### *Professional Standards*

- 4.14 Strict confidentiality must be maintained at all times by those who participate in the recruitment process. Confidential documents containing applicant details, application form, interview notes, employment offers etc. must be securely filed away.
- 4.15 Declaration of close personal or financial relationships with any applicant must be made to the Recruiting Manager. Anyone in this category will not be allowed to participate in the recruitment decision (this excludes ordinary working relationships).

## 5. Related Policies, Guidelines, Templates and Forms

- Disciplinary Action Policy
- Performance Improvement Policy
- Recruitment Toolkit
- Safeguarding and Child Protection Policy and Procedure
- Whistleblowing Policy (included in the Employee Handbook)
- Code of Conduct for Staff and Volunteers including Acceptable Use Policy (Education Policy)

## 6. Procedure

### (Step 1) Safer Recruitment Training

- 6.1 It is best practice for those involved in the Recruitment Process to have successfully completed [Safer Recruitment Training](#) and have obtained the Certificate in Safer Recruitment by NSPCC (link below). At least one of the Interview Panel Members must have completed Safer Recruitment Training
- 6.2 Members of the Recruitment Community must successfully complete the Safer Recruitment Training and obtain the Certificate in Safer Recruitment.
- 6.3 We believe training further strengthens and safeguards students in schools by helping to deter and prevent abuse; as such this is also a mandatory requirement for all Cognita employees who have a lead role in the safeguarding/child protection of students in a school Refresher training must be completed every two years.
- 6.4 The online training is currently available from the NSPCC eLearning Portal (content formally managed by the UK Department for Education) and needs to be refreshed every two years via; <https://learning.nspcc.org.uk/training/safer-recruitment-education>

In addition, face-to-face Safer Recruitment Training is also available from Cognita Accredited Safer Recruitment Trainers. Where face-to-face Safer Recruitment Training occurs, confirmation of the training to be recorded and saved on the school training log

### 7 (Step 2a) Role Profiles

- 7.1 Role Profiles, including the Person Specification should be reviewed for each new vacancy and must include the main duties and responsibilities experience and behaviours specific to the needs of the role, using the Role Profile Templates.
- 7.2 Role Profiles must set out the safeguarding requirements of the role (setting out the extent that the role will involve contact with children and whether the individual will be engaging in regulated activity relevant to children). It must also include a statement about the individual's responsibility for promoting and safeguarding the welfare of children s/he is responsible for, or comes into contact with, as below:
- To comply with safeguarding policies, procedures and code of conduct
  - To demonstrate a personal commitment to safeguarding and student/colleague wellbeing
  - To ensure that any safeguarding concerns or incidents are reported appropriately in line with policy
  - To engage in safeguarding training when required.

### 8 (Step 2b) Advertisements

- 8.1 When advertising a role, either internally or externally, it is important to outline the requirements in terms of the duties and responsibilities, the experience/background needed, and the personal qualities sought.
- 8.2 The [advertisement](#) should then be written to reflect these in a way that makes the position attractive to applicants, but also has sufficient benchmarks to dissuade those who clearly do not have the required skills from applying
- 8.3 Cognita actively encourages internal moves and promotion, but also reserves the right to advertise externally in the quest to find the best person for the job. This decision should be made between the Recruiting Manager and the Principal
- 8.4 Advertisements should always include the following abridged Commitment Statement which sets out Cognita's commitment to safeguarding children

*"Cognita Schools are committed to safeguarding and promoting the welfare of children and young people and expects all staff, volunteers and other third parties to share this commitment. Safer recruitment practice and pre-employment background checks will be undertaken before any appointment is confirmed."*

### 9 (Step 3) Scrutinising, Shortlisting, and Interviewing

#### *The Application Form*

- 9.1 The detailed [Safer Recruitment Procedure for Scrutinising, Shortlisting and Interviewing](#) is set out in [Appendix 1](#).
- 9.2 External Applicants and Internal Non-Employees, must complete Cognita's [Application Form available via the Recruitment Module or Toolkits](#) to apply for a vacancy in order to comply with the Safer Recruitment Policy. Internal Employees may apply for vacancies by submitting an Expression of Interest in the form of a cover letter including a personal statement specifying how they are suitable for the role



## Safeguarding: Safer Recruitment Policy and Procedure

---

- 9.3 It is the responsibility of those who are nominated within the schools or those responsible for the Recruitment process to carry out a [basic social media](#) search via google for all shortlisted candidates
- 9.4 Applicants should provide their [full employment history](#) in the application form since the age of 16 including education, employment and voluntary work
- 9.5 Where there are [gaps in employment](#), a note of this should be made, further clarifications sought and used in consideration of whether to short list the applicant
- 9.6 Applicants should give a [minimum of two professional reference](#) contacts from two separate employers on the Application Form: and include the most recent employer and the most recent employment working with children (if different). If the applicant has never worked with children, a reference must be obtained from their current employer
- 9.7 Additional references where required should be included on the Application form
- 9.8 The [Invite to Interview Email](#) should be sent with the [Self Declaration Form](#), that needs to be completed and sent prior to the interview. Any declarations on this form need to be reviewed and clarified during the interview
- 9.9 It is [mandatory to have a minimum of two interviewers](#); in some cases, there may be more depending on the role. At least one member of the panel should have completed NSPCC Safer Recruitment Training
- 9.10 [Interview Panels](#) should agree and understand the required standard for the role they are appointing, using the Interview Questions Template; clear [interview notes](#) should be made and retained on file

## 10 Step 4: Offer letter & Contract of Employment

- 10.1 There are a number of references/clauses in the offer letter and contract of employment which enable the management of a new employee's suitability to work with children. Both documents should record that the offer is subject to the receipt of satisfactory background checks
- 10.2 The [Template Offer Letter](#) and [Contract of Employment](#) must be used in order to satisfy the conditions of employment relating to safeguarding
- 10.3 The initial period of employment enables an observed judgement of an applicant's suitability to work with children and capability for the role. Please refer to [Step 7: Probationary Period Including Induction](#) for further information
- 10.4 All shortlisted candidates are required to give full details of convictions and cautions, including those which would otherwise be considered "spent" by virtue of the said Act
- 10.5 All applicants will be required to sign a Safeguarding Declaration within the Contract of Employment to evidence their commitment

### [Internet Search](#)

- 1.1 Applicants should be subject to a basic internet/media search to help identify the applicant's online identity and determine whether there may be any reputational risk to the



school/Cognita based on comments made by or about them online. Any information requiring further consideration should be discussed with the applicant and noted on the summary report from the interview documenting the considerations made.

Information relating to the personal protected characteristics of the applicant (e.g., their race or religion) will not be taken into account in considering their application.

- 1.2 Searches should cover all countries where the applicant has lived and/or worked to ensure a full picture of their past is captured.

### *Gaps in Employment History*

- 1.3 All Application Forms should be scrutinised to ensure they are fully and properly completed, and that the information provided is consistent and does not contain any discrepancies, including identifying any gaps in employment. Where there are gaps in employment, a note of this should be made and used in consideration of whether to short list the applicant. Together with obvious gaps in employment, the reasons for a history of repeated changes of employment without any clear career or salary progression should be explored and verified. This can also include a mid-career move from a permanent role to supply teaching or temporary work.

### *Taking up References*

- 1.4 Applicants should give a minimum of two professional reference contacts from two separate employers on the Application Form. A key purpose of the reference is to verify the applicant's suitability to work with children. These reference contacts must therefore include the most recent employer and the most recent employment working with children (if different). References should be sought on all short-listed school-based applicants, including internal ones and should be from a senior person within the organisation.
- 1.5 The School must request all written references directly from the referee. Cognita does not accept an open reference as part of the recruitment process e.g., "to whom it may concern". A minimum of two returned and satisfactory references are required on each personnel file.
- 1.6 As a rule, character references are not acceptable; this includes references from relatives or people writing solely in the capacity of friends. If there is a good reason the applicant cannot supply the requisite number of referees (e.g., because they are recent graduates or have only held a small number of jobs), references may be sought from high quality alternatives (e.g., University tutor).
- 1.7 References should be requested using the [Employer Reference Request Form](#) and the [Reference Request Letter](#). If a reference is received electronically and has not been signed by hand by the referee, evidence must be sought and retained in the employee file to demonstrate that the reference was provided by the expected referee and email address.

### *Teaching staff:*

- 1.8 Prior to the interview, it is best practice for all permissible references to be requested for shortlisted applicants, taking into account whether the applicant has requested that their current employer should not be contacted at this stage.
- 1.9 Prior to the interview, at least two written references must be requested for shortlisted applicants. Where possible, best endeavours must be made to ensure these are received and scrutinised before the interview.

## Safeguarding: Safer Recruitment Policy and Procedure

---

- 1.10 All job offers are conditional upon receipt of a minimum of two satisfactory references and any appointment must not be confirmed until all required references, which must include either the current or most recent employer, have been received.

### *Non-teaching school-based staff:*

- 1.11 Prior to the interview, at least one written reference must be requested for shortlisted applicants. This does not have to include the current or most recent employer at this stage, the Application Form asks if the referee can be contacted prior to interview for this reason.
- 1.12 Once the successful applicant has been offered the role, the second reference must then be requested, including from the current or most recent employer if this was not obtained before the interview, in order to complete the reference process.
- 1.13 All job offers are conditional upon receipt of a minimum of two satisfactory references

### *Concerns from a Reference*

- 1.14 All references should be scrutinised by the Recruiting Manager upon receipt and special attention paid to questions regarding disciplinary issues, suitability to work with children, re-employment and whether the dates of employment, role and duties match the information supplied on the Application Form. Referees should be contacted for a follow-up conversation if any of these elements are unclear or give cause for concern. Notes of the conversation should be made and dated and retained on the applicant's personnel file. Any issues of significant concern should be escalated to the Cog Head of HR.
- 1.15 Where an individual has not listed relevant or logical referees the school may ask the applicant to provide more suitable referees and/or should consider contacting those referees who have not been listed. Any such contact should be discussed with the applicant in advance, documented, dated and included in their personnel file if they are subsequently appointed. Reasons for leaving former employers should also be sought.
- 1.16 In the event that suitable references cannot be obtained, the matter should be escalated to the Cog Head of HR for advice on how to proceed prior to any job offer being made.

### *Invitation to Interview*

- 1.17 The [Invite to Interview Letter or Email](#) should include; the date, time and place of the interview, directions to the venue, names of those people on the interview panel, details of the selection process, the full-length Safeguarding Commitment statement and a statement that the interview will include questions relating to safeguarding.
- 1.18 Prior to the interview and where possible, applicants should be asked to bring or submit three original documents, a copy of which must be kept on the personnel file and the person verifying the documents must sign and date the copies:
- two confirming their identity i.e., a current driving licence, passport and/or Emirates/ Civil ID or National Card (one of which must include their photograph)
  - plus, one document confirming their current name and address such as a utility bill or financial statement (dated within the last three months). It is not permissible for applicants to offer photocopied documents for the purposes of identity checking. If submitted digitally, the documents must be produced on the first day of employment

### *Preparing for the Interview (Selection Process and Interview Panel)*

#### *Selection Process:*

- 1.19 In order to help select the most appropriate applicants a number of different selection techniques may be deployed. In all cases, there should be an interview, and this can be complemented by a carousel format such as; assessments, numeracy and/or literacy tests, a lesson observation and/or case study/presentation, student panel/staff panel, tour etc. For school-based teaching roles, it is good practice to involve students in the recruitment and selection process in some way, so that applicants' interaction with them can be observed (although under no circumstances should an applicant be left unsupervised with students of any age during the recruitment process). If appropriate, the final decision may be reached via a second interview.
- 1.20 Where appropriate, select work-based assessments, exercises or personality profiling to further assess an applicant's suitability for the role. Please contact the HR department in the first instance to ensure suitability.
- 1.21 It is important to prepare thoroughly prior to beginning the selection process, and the interview content is a key part of this. It is important to identify who should be involved in the selection process, assigning responsibility, and setting aside sufficient time for the work needed at each stage. This ensures all elements of recruitment safeguards are not rushed or overlooked.

#### *Interview Panel:*

- 1.22 It is recommended, but not mandatory to have a minimum of two interviewers, and in some cases, i.e., for senior or specialist roles, a larger panel might be appropriate. A recruitment panel allows for at least one member to observe and assess the applicant, and the other to make notes. It also allows for the corroboration of events within an interview should an applicant attempt to bring a claim for an alleged breach of process or legislation within the recruitment process. A manager who interviews alone does not have such a defence. At least one member of the interviewing panel must have completed the Safer Recruitment Training and obtained the certificate in Safer Recruitment.
- 1.23 The members of the interview panel should meet before the interview to:
- agree and understand the required standard for the role to which they are appointing
  - consider the issues to be explored with each applicant and who on the panel will ask about each of those
  - agree the assessment criteria in accordance with the Role Profile and Person Specification
  - review the [Interview Template](#) to select the relevant questions for the post, ensuring Safeguarding questions are a focus
- 1.24 The Recruiting Manager should also consult others involved in the selection process, such as teachers involved in the lesson observation, tours or informal meetings to obtain their feedback, and collate and assess any associated paperwork. These should be incorporated into the summary or interview record documentation as required.

### *Verify Identity*

## Safeguarding: Safer Recruitment Policy and Procedure

---

- 1.25 When verifying identity, those responsible are aiming to corroborate the person's full name, including forenames and last name, date of birth, and full permanent address. Where necessary applicants should also provide any official documentation regarding name changes.
- 1.26 Where an applicant claims to have changed his or her name by deed poll or any other government accredited mechanism (e.g., marriage, adoption, statutory declaration) he or she is required to provide documentary evidence of the change.
- 1.27 A copy of the documents used to verify the successful applicant's identity and address must be kept on their personnel file for record-keeping purposes and the person verifying the documents must sign and date the copies.

### *Verify Professional Qualifications*

- 1.28 Applicants must also be asked for evidence of their educational or professional qualifications that are necessary or relevant for the role or for the necessary country visa sponsorship (i.e., the original or certified copy of a certificate, or diploma, or a letter of confirmation from the awarding body). If the applicant cannot produce original documents or certified copies, written confirmation of his or her relevant qualifications must be obtained from the awarding body (for teaching positions) prior to the appointment being confirmed.
- 1.29 A copy of the qualifications must be kept on the personnel file and the person verifying the documents must sign and date the copies.

### *Interview (Scope of Interview, Outcome and Regrets)*

- 1.30 The interview should assess the merits of each applicant against the role requirements. It is important to ensure that the interview process adopted for internal applicants is exactly the same as that for external applicants for the same role. It is also very important to explore each applicant's suitability to work with children.
- 1.31 Each applicant must be given a fair and equal opportunity to demonstrate that they have the skills, experience and personal attributes that are being sought. The selection process should reflect the requirements of the role, the necessary competencies to be successful in the role, and the personal qualities appropriate to the environment.
- 1.32 All applicants should be tested in the same areas and should convincingly reach the level that was expected at the outset. An applicant should not be recruited based on being the 'best of the group', they should be the best person for the role. This may require commencing the search again if a suitable applicant is not sourced from the original search.
- 1.33 Having agreed the interview questions the panel will explore any issues with each applicant, based on the information provided in the Application Form and references received. An applicant's response to a question will determine whether and how that is followed up.
- 1.34 It is better to ask behavioural based questions which ask an applicant to relate how s/he has responded to or dealt with an actual situation in the past, or questions that test an applicant's attributes and understanding of key issues.
- 1.35 Interview notes should be taken by all panel members and collated at the end of the interview by the Recruiting Manager. Interview notes should be legible and cover all key topics discussed during the interview. At the very least the Recruiting Manager should prepare a legible or typed summary of the interview covering the points listed in section

6.43. Furthermore, the Recruiting Manager should make summary comments as the responsible person.

- 1.36 The Recruiting Manager should ensure the interview notes are securely retained for a maximum of three months and then if the applicant is not successful, they may be shredded. It is important that interview notes are retained for this period of time as they will provide justification in the event of a potential complaint about the selection process.
- 1.37 Interview notes for the successful applicant should be retained securely on their personnel file for record-keeping purposes for the duration of their employment and any required statutory period of time thereafter.
- 1.38 Please note, for Principal recruitment, all interview notes must be collated by the Recruiting Manager and passed to the Head of Recruitment for secure and confidential filing.

### *Scope of the Interview:*

- 1.39 In addition to assessing and evaluating the applicant's suitability for a particular role, it is imperative that safeguarding questions are asked at interview to ensure the filtering process of unsuitable applicants, but also to gain an insight into the knowledge, experience, and attitude of the applicant towards safeguarding, as this information can facilitate early training requirements upon commencement of role.
- 1.40 The interview panel should also therefore explore:
- the applicant's attitude towards children and young people
  - his or her ability to support the School's policy for safeguarding and promoting the welfare of children
  - gaps in the applicants' employment history
  - periods of time spent overseas
  - concerns or discrepancies arising from the information provided by the applicant and/or a referee
- 1.41 All applicants invited to interview are entitled to a meaningful interview irrespective of any change in circumstances (e.g., change of budget; identification of a preferred applicant; answers to early questions are poor) which might tempt the Recruiting Panel to abbreviate the process. This maintains a professional image of the school, of Cognita and will to some extent protect from potential claims of an unfair process.

### *The Outcome:*

- 1.42 The recruitment decision should be based purely on the criteria required, so any outcome can be explained constructively to the unsuccessful applicants. Any feedback that can help them should be given honestly and, for internal applicants, learning and development areas may be identified. The HR Department can assist with ensuring this feedback is constructive.

### *Regrets:*

- 1.43 It is essential that the successful applicant is either told after the regrets or in confidence until all the outcomes are known. It is the Recruiting Manager's responsibility to ensure that this process is controlled effectively.

### (Step 4) Offer letter and Contract of Employment

- 1.44 There are a number of references/clauses in the offer letter and contract of employment which enable the management of a new employee's suitability to work with children.

#### *Terms and Conditions of Employment*

- 1.45 The [Template Offer Letter](#) and [Contract of Employment](#) must be used in order to satisfy the conditions of employment relating to safeguarding.

#### *Probation*

- 1.46 The initial period of employment enables an observed judgement of an applicant's suitability to work with children and capability for the role. Please go to [\(STEP 7\) PROBATIONARY PERIOD INCLUDING INDUCTION](#) for more information.

#### *Rehabilitation of Offenders*

All applicants are required to give full details of convictions and cautions, including those which would otherwise be considered "spent" by virtue of the said Act.

#### *Standards and Policies*

- 1.47 Teaching staff are expected to conduct themselves in line with the following:
- Staff Code of Conduct and acceptable use policy

#### *Safeguarding Declaration*

All applicants will be required to sign a Safeguarding Declaration within the Contract of Employment to evidence their commitment.

### (Step 5) Background Checks

- 1.48 An offer of employment must be conditional upon:
- the receipt of at least two satisfactory written references
  - verification of the applicant's identity (if that could not be verified at the interview)
  - Right to work
  - Local Police Check (Emirates/ Civil ID and Labour Card)
  - the receipt of overseas criminal records checks for all other countries in which the applicant has lived or worked for three months or more in the past ten years (if applicable) and for the country they completed their teacher training in (if outside the country)
  - The receipt of a Letter of Professional Standing (if teaching and previously taught overseas)
  - verification of the applicant's medical fitness
  - verification of appropriate qualifications/professional status (where required)
  - signed annual disqualification declaration
  - satisfactory completion of the probationary period



## Safeguarding: Safer Recruitment Policy and Procedure

---

- 1.49 All checks should be recorded in writing, verified (date and signature) documented and retained on the employee's personnel file. A summary of the checks must be recorded on the [Single Central Record Tracker \(SCRT\)](#).
- 1.50 The above checks must be completed before an applicant takes up the post, this may result in delaying the commencement of employment.
- 1.51 Any exceptions to this must have been discussed within a conference call involving the Principal and the Head of Recruitment following which they confirm their agreement that it is necessary for the individual to start work before all the vetting checks are complete and that the proposed measures that will be taken are appropriate to safeguard students' welfare.
- 1.52 Any exceptional permission to appoint without all recruitment vetting checks completed will be subject to the following conditions:
- all vetting checks **must** have been applied for
  - at least two written references **must** have been received, and the Recruiting Manager must have spoken personally over the telephone (or face to face) with the remaining referee(s), asked and obtained answers to all of the questions on the reference request form, and a full written note must have been taken of these discussions and placed on the personnel file
  - at least one reference must be received from the most recent employer and where the role has involved working with children.
  - verification of the individual's identity, right to work in the country, qualifications and medical fitness **must** have been completed
  - the annual disqualification declaration **must** be completed
  - a Risk Assessment **must** be completed using the appropriate [Risk Assessment template on the SCRT](#) and this must be suitably approved on the employee record
  - steps must be taken to ensure mitigating arrangements, which will include appropriate supervision and restrictions on certain types of activity (such as school trips), are put in place pending completion of the vetting checks and documented on the [Risk Assessment Form](#), which must be reviewed by the Principal every two weeks, and updated notes produced as an audit trail
  - details of supervisory measures and restrictions on work **must** be discussed and agreed with the new employee prior to them starting.
  - whilst the check remains outstanding, a note that there is a risk assessment in place should be recorded on the [Single Central Record Tracker \(SCRT\)](#)
- 1.53 If any of the information contained in the pre-employment checks is unsatisfactory or has discrepancies, this should be followed up by the Recruiting Manager supported by a member of the HR Department. Any disclosure information relating to a conviction should be notified to the Regional CEO for careful consideration of suitability to the post. Serious, deliberate fraud or deception in connection with an application for employment may amount to a criminal offence. In such cases the employer should, in addition to any planned disciplinary action, consider reporting the matter to the relevant authorities and/or regulators. The Regional CEO will be notified of any reporting to relevant authorities and/or regulators.
- 1.54 To assist you keeping track of this process, please use the [New Starter Probation Checklist](#).

## References

- 1.55 Previously detailed in Sections 6.16 – 6.28 inclusive.



### *Verifying Identity*

1.56 Previously detailed in Sections 6.35 to 6.40 inclusive.

### *Right to Work*

1.57 When appointing new staff, the person's right to work in the country must be verified. Advice can be sought from the HR Teams and the Public Relations Officer. Copies of documents should be verified (date and signature) and retained on the personnel file.

### *Overseas Checks*

1.58 Staff that have lived and/or worked outside of the country must undergo the same background checks as all other applicants, plus additional criminal/Police record checks (overseas checks) to account for their time spent overseas. Copies of documents should be verified (date and signature), retained on the personnel file and recorded on the [SCRT](#).

1.59 Criminal/Police record checks must be sought for:

- all other countries in which the applicant has lived and/or worked for a period of three months or more in the past ten years. Please note that checks are not required prior to the age of 16.
- country where applicant completed teacher training (or relevant teaching qualifications)

1.60 If an overseas check is not in English, a reputable translation company should be used to translate the document. To ensure data protection, no member of the school staff or department must be asked to assist with translation, unless they are a member of the Interview Panel. Please contact a member of the HR Department for further support.

1.61 In the event that criminal/Police record checks are not available or forthcoming from a country, alternative documents to evidence their time spent in the country must be sought, such as certificates of good conduct (where available) or, if they worked in the country, full employment references. If no employment references are available, character references from professionals that knew the individual in the country can be sought. This should be recorded on an [Overseas Criminal Checks Risk Assessment Form](#) and filed on the applicant's personnel file.

1.62 Any disclosures on overseas checks will need to be discussed with the Principal, DE and Cog Head of HR to allow an informed recruitment decision to be made.

1.63 Military Personnel:

If an applicant has spent time overseas serving in the Armed Forces, criminal/Police record checks should still be requested for all countries where the individual has spent three months or more in the past ten years

### *Medical Fitness Check*

1.64 At offer stage, a [Health Declaration Form](#) is required from each member of staff, duly signed, that they know of no reasons, on the grounds of mental or physical health why they should not be able to discharge their duties with respect to the Role Profile and contract of employment.

1.65 Copies of [Health Declaration Forms](#) should be verified (date and signature), filed in a separate file (not on the personnel file) and recorded on the [SCRT](#).

### *Disqualification*

- 1.66 At offer stage, (and annually at the start of Autumn term thereafter) an [Annual Disqualification Declaration Form](#) is required from each member of staff who provide childcare for children up to the age of five during school hours and up to the age of eight in wrap around care and those directly involved in managing the early years provision, confirming that they are not disqualified under the Childcare (Disqualification) Regulations 2018.
- 1.67 The declaration must be signed and retained on the personnel file. There is not a requirement for this check to be recorded on the [SCRT](#).

## **(Step 6) Recording and Monitoring New Starters**

### *The Single Central Record Tracker (SCRT)*

- 1.68 Schools must keep a [SCR](#) to evidence they have carried out the range of checks required by law on their staff. All individuals who work in regular contact with children, including volunteers and those employed by third parties (including Teacher Trainees) must be included on the [SCRT](#), along with details of all members of the Proprietor Body.
- 1.69 The [SCRT](#) must contain the following fields:
- Full name of staff member
  - Position and Start date
  - Identity check
  - Qualifications
  - Right to Work in the country
  - Overseas checks
  - References
  - Application Form
  - Medical fitness declaration
  - Notes
- 1.70 Best practice for all documents copied, dated and signed is to state they are a "copy of the original" so that there is no doubt on record. It also helps if the signature has the name printed underneath for future reference.
- 1.71 The checker must input the following on to the [SCR \(in SCRT\)](#):
- Confirm the check is required by switching the appropriate tab to green
  - the date the original documentation was seen
  - their (the checker's) initials
  - if there is no requirement to see documentation (e.g., an overseas check is not required) the appropriate tab should be switched to 'non-applicable' and signed by the checker's initials and this will confirm to green. No field should be left incomplete.
- 1.72 If operating from a multi-site school and sharing staff all information listed above should be recorded on both schools' [SCRs](#).
- 1.73 Only one location, single registered school or Regional Office should be responsible for; holding the full personnel file of a staff member, obtaining the necessary documents and for

undertaking any appropriate checks. They are then responsible for providing written confirmation of the checks to the other sites, together with any applicable risk assessments.

- 1.74 The Principal at the second site is then responsible for reviewing the data and for documenting any site specific risk assessments on the basis of the information provided and their acceptance that all the necessary checks for the post within their school have been completed to their standard. Where necessary they should also undertake additional checks applicable to the arrangements at their school if the original risk assessment does not provide an appropriate mitigation for that site. If any additional check is required, the second school will complete the check and ask for the primary school to retain the information on file.

### *New Starter Probation Checklist*

- 1.75 The [New Starter Probation Checklist](#) must be completed as an evidence tool that all necessary checks and returns have been received. This document is signed off by the Principal and filed in the personnel file.
- 1.76 If any of the checks required are not fully compliant with the standard process this must be documented on a [Risk Assessment Form](#) whereby a discussion with the employee is recorded, the considerations noted, details of any mitigating actions are clearly defined and the outcome determined by the Principal to enable a full audit trail.

### *Staff Annual Declaration*

- 1.77 On an annual basis all staff will be required to complete the [Staff Annual Declaration](#) which ensures their knowledge and understanding of safeguarding related policy, procedure, key contacts in the school and (for all relevant staff) provides for a personal safeguarding declaration. Where an aspect of the annual declaration is not applicable to the role undertaken by the individual, then they should enter "N/A" against the relevant entry on the Declaration before signing and returning it.

### *Change of Employment*

- 1.78 Where an employee's role changes, the Recruiting Manager must give due consideration to the relevant checks now appropriate for the new role (i.e. has the existing member moved to a position involving regulated activity?).
- 1.79 If a member of staff moves from a position involving regulated activity into non-regulated activity only, ongoing relevant checks should be monitored and recorded.
- 1.80 In both cases the [SCR](#) should be updated accordingly.
- 1.81 All paperwork and checks associated with a change of employment must be filed in the personnel file and a note of the change recorded on the SCR.

## **(Step 7) Probationary Period including Induction**

### *Induction*

- 1.82 An induction programme should be made available to all new staff, regardless of role or previous experience. The purpose of the induction is to:

- Provide training and information about the School and Cognita's policies and procedures including the vision and values, objectives and ethos, with specific reference to safeguarding and promoting children's welfare, including child protection.
- Support individuals in a way that is appropriate for the role to which they have been appointed;
  - Confirm the conduct that is expected of staff (Cognita's Code of Conduct for Staff and Volunteers including Acceptable Use Policy)
  - Provide opportunities for new members of staff to discuss any issues/concerns about their role or responsibilities
  - Enable the new member of staff's Line Manager to recognise any issues/concerns about the person's ability or suitability at the outset and address them immediately.

1.83 The content and nature of the induction process will depend upon the role and previous experience of the new member of staff, but must include the information on the policies and procedures in relation to safeguarding and promoting the welfare of children e.g.:

- (Education) Safeguarding and Child Protection Policy and Procedure, which should also cover;
  - Safe practice and the standards of conduct and behaviour expected of staff and students in the School
  - How and with whom any concerns about those issues should be raised
- (HR) Other relevant employment procedures which should include;
  - Disciplinary, performance improvement and whistleblowing procedures
  - Equal Opportunities Policy and the wider Employment Handbook

1.84 An [Induction Checklist](#) provides the means to document that safeguarding was covered in the first week of employment as a further demonstration of the school/Cognita's commitment to safeguarding our students. This [Induction Checklist](#) should be completed for each member of staff and filed in the personnel file.

1.85 The induction programme should also include Child Protection Training appropriate to the new member of staff's role to ensure their full understanding of their safeguarding responsibilities. In addition, this will help ensure they best understand the school/Cognita's commitment to safeguarding and promoting the welfare of children.

1.86 The new member of staff will be required to complete the [Staff Annual Declaration](#) upon joining the school and on an annual basis.

### [Probation](#)

1.87 The initial period of any new role is inevitably a time of adjustment during which the new starter becomes acquainted with a new environment, different working practices, routines and standards of performance. This will take time and to enable both parties to realistically assess suitability for the role, as such all new starters employment is subject to a probationary period (the length is role dependant).

1.88 Performance will be monitored and discussed throughout this period including a formal review meeting to discuss how both parties feel about the role, school/department/Company and progress made in position and to ensure positive relationships with colleagues, students and parents have been made.

1.89 If the school/Company is not satisfied that the necessary level of performance has been reached during the probationary period and/or there are some other concerns, the probation

may be extended. In some instances, either party may decide to give notice to terminate employment (which is usually a shorter period during this time).

- 1.90 A new member of staff whose role places them in the Recruitment Community must undertake [Safer Recruitment Training](#) during their Probation Period.
- 1.91 The probation period is also a significant period during which the new starter's attitude to safeguarding should be assessed. No appointment should be confirmed until the Line Manager is satisfied that the new starter fully understands and embraces the school's safeguarding philosophy and understands their own personal accountability.
- 1.92 The [Probation Review Form](#) should be used to document the discussion and conclude the probationary period. No confirmation of successful completion of the probationary period should be issued if there is still an outstanding check required.

### [Notification Responsibilities](#)

- 1.93 If any information regarding an applicant comes to light through the recruitment and selection process, to suggest that they may have harmed or pose a risk of harm to a child or vulnerable adult the matter should be discussed with the Cog Head of HR immediately to ensure we meet our legal duty to refer a 'cause for concern' of this nature to the relevant third parties.
- 1.94 This obligation regarding the legal duty to refer a "cause for concern" extends beyond the recruitment and selection process and applies to any volunteers, trainee teachers, supply staff, those on fixed term contracts, resignations, voluntary withdrawal and all contract workers. All such instances will be disclosed to the Regional CEO so that the Proprietor exercises their duty appropriately. In addition, all such instances will be disclosed to any external inspector as required.
- 1.95 We also follow the Teacher Misconduct: The Prohibition of Teachers (April 2018) where referral to the Teaching Regulation Agency is required.

### **Non-Employee Groups**

- 1.96 In order to safeguard the students in our care we require a similar rigorous approach to recruitment for all non-employee Groups. Schools must obtain written notification from any agency or third-party organisation that present staff to work within the school that they have completed all the checks we would have undertaken if employing directly required for the post. The school must also conduct their own identity check to ensure that the person presenting for work at the school is one and the same person for whom the third-party organisation have confirmed the checks have been undertaken. Under no circumstances should any non-employee in respect of whom no checks have been obtained, be left unsupervised or allowed to work in regulated activity. To this end, guidance has been produced for third party contractors and non-employees (including supply, the self-employed and volunteers).

## **7. Compliance**

- 7.1 I have read and fully understand the above Policy and Procedure and accept and agree to all the terms and conditions outlined in this and the incorporated documents, or part documents, as specified.
- 7.2 If any provision of this Policy is or becomes illegal, void or invalid, that shall not affect the legality and validity of other provisions.

**Safeguarding: Safer Recruitment Policy and Procedure**

---

|                     |       |
|---------------------|-------|
| JOB TITLE/ROLE:     | ----- |
| PRINT NAME:         | ----- |
| DATE:               | ----- |
| EMPLOYEE SIGNATURE: | ----- |

## Safeguarding: Safer Recruitment Policy and Procedure

| Ownership and consultation |  |
|----------------------------|--|
| Document sponsor (role)    | HR Director  |
| Document author (name)     | Trinity Stewart, Head of HR, Cog 2   |
| Specialist Advice          | Clyde & Co. (Lawyers) – September 2022<br>Farrer's and Co. (Lawyers) – Aug-Sept.2015 |

| Audience |   |
|----------|---|
| Audience | Principal<br>Line Managers/Recruiting Managers<br>SCR Champions<br>Recruitment Community personnel<br>School HR Teams<br>Education Team |

| Document application and publication |     |
|--------------------------------------|-----|
| UAE                                  | Yes |
| Kuwait                               | Yes |

| Version control     |                |
|---------------------|----------------|
| Implementation date | 01.09.2022     |
| Review              | September 2024 |
| Review Date         | September 2025 |

| Related documentation |  |
|-----------------------|--|
| Related documentation | o Safer Recruitment Toolkit                    |
|                       | o Non-employees Guide to Pre-employment Checks |
|                       | o Third Party Checks Guidance for Suppliers    |
|                       | o Self Employed Toolkit                        |
|                       | o Volunteers Toolkit                           |