

UG School - Safer Recruitment Policy



APPROVAL AND REVIEW DETAILS

Owner: School Director
Reviewers: Board of Governors, Human Resource and Law Department
Approved by School Director
Date approved: June 2025
Next review due by: June 2026

1. Purpose and Scope

UG School is committed to safeguarding and promoting the welfare of children and young people. This policy outlines the principles and practices of safer recruitment, ensuring all staff, volunteers, contractors, and board members are suitable to work with children and uphold the highest standards of professional conduct.

2. Key Principles

- Recruitment decisions prioritize child safety and protection.
 - All processes are transparent, consistent, and compliant with COBIS, BISSC codes, Georgian Legislation and all relevant legislation, recommendations and guidance including the

statutory guidance published within the UK by the Department for Education (DfE) including KCSIE, the Prevent Duty Guidance for England and Wales 2015 (the Prevent Duty Guidance) and any guidance or code of practice published by the Disclosure and Barring Service (DBS or by the Association of Chief Police Officers who oversee ACRO);

- The policy applies to all roles, including teaching, support, leadership, and governance.
 - to ensure that the best possible staff are recruited on the basis of their merits, abilities and suitability for the position;
 - to ensure that all job applicants are considered equally and consistently;
 - to ensure that no job applicant is treated unfairly on any grounds including race, skin color, language, ethnic or social origin, nationality, background, property or social status, type of employment contract, place of residence, age, gender, sexual orientation, disability, health status, religion, membership in a social, political, or other organization (including trade unions), marital status, political or other opinion, or any other grounds that aim to or result in the denial or infringement of equal opportunities or fair treatment in employment and professional activities.

3. Mandatory Training

- All staff, board members, and contractors must complete regular safeguarding and child protection training.
- Training includes updates on local and international safeguarding protocols, whistleblowing procedures, and reporting mechanisms.

Recruitment and Selection Procedure

Advertising

To ensure equality of opportunity, the school will advertise all vacant posts to encourage as wide a field of applicant as possible, normally this entails an external advertisement using a variety of platforms, including a Georgian recruitment agency.

The school website and any promotion of employment will make clear the school's commitment to safeguarding and promoting the welfare of children, and to Data Protection provisions.

All documentation relating to applicants will be treated confidentially in accordance with GDPR and Georgian regulations.

Use of Application Forms for teaching staff

UG School uses an application form and all applicants for employment will be required to complete an application form containing questions about their academic and full employment history and their suitability for the role.

The application form will include the applicant's declaration regarding convictions and working with children.

UG School will not employ anyone who has been prevented from working with children or is unable to provide sufficient evidence of suitability to work with children.

Job Descriptions

A job description is a key document in the recruitment process and is usually finalised prior to taking any other steps in the recruitment process. It will clearly and accurately set out the duties and responsibilities of the job role, including the employee's obligation to safeguard and protect children.

4. Pre-Employment Screening

- All applicants must undergo a child protection check, which involves providing a criminal record check from the Georgian Ministry of Internal Affairs Service Agency, a sex offender conviction certificate; a disqualification certificate; if the applicant has lived or worked in the UK, they must also provide a DBS check, and if they have lived or worked in other countries, an ICPC or equivalent check.

- an online presence check is also carried out to verify the applicant's profiles on social media and other areas of the internet . Online verification must be carried out only based on publicly available information and with full adherence to the principles of candidate data protection.
- Applicants must declare any previous safeguarding concerns or investigations.

Identity and Barring Checks

- for positions which involve independent contact with students engaged in school-related activities, where the position amounts to "regulated activity", confirmation that the applicant is not named on the Barred List before commencement of employment (this information is obtained via an ICPC application and through the barring checks conducted by COBIS)
- The UG School will contact COBIS for a barring check for all applicants
 - the School being satisfied that the applicant is not, and has never been:
 - the subject of a sanction, restriction or prohibition from teaching;
 - and is not listed as a teacher that has failed their statutory induction or probation period;
 - and is not listed as subject of a sanction by the GTCE;
 - and is not identified to the Teaching Regulation Agency (TRA) as having current European Economic Area member state restrictions or sanctions imposed upon them, which would prevent the applicant working at the School or which, in the School's opinion, renders the applicant unsuitable to work at the School;
 - and confirmation that the applicant is not subject to a direction under section 128 of the Education and Skills Act 2008 which prohibits, disqualifies or restricts them from being involved in the management of an independent school including academies and free schools
 - The checks detailed above are conducted through liaison with COBIS, rather than directly with the individual agencies
- An up-to-date International Child Protection Certificate (ICPC) will be sought in all cases where a staff member has lived or worked in the UK
- Any further checks which are necessary as a result of the applicant having lived or worked in other countries
 - applicants who have lived/travelled abroad for more than 3 months should obtain a criminal record check from the relevant country.
 - We will seek to check criminal records overseas for those who have lived or worked overseas for this timeframe over at least the last ten years.
 - We will seek to be as stringent and extensive as feasible, bearing in mind any other assurances that we have been able to obtain such as an ICPC.
 - Where a previous police check is missing from the records of a prospective employee it will be expected that the applicant will make all reasonable

attempts to obtain a copy of the check and demonstrate evidence of such efforts.

- Locally hired employees undergo a local police check, based on which the Georgian MIA Service Agency issues relevant certificates. This also applies to personnel returning from maternity leave and long-term incapacity for work due to health reasons.
- verification of the applicant's physical and mental medical fitness for the role is made on the first day of the contract following a self-disclosure of medical fitness as part of the application form;
- verification of the applicant's right to work in Georgia as soon as is practicable;

5. Interview Process

- Interviews are conducted by at least two panel members, one of whom has completed Safer Recruitment Training.
- Every interview includes standard safeguarding questions to assess candidates' understanding, attitudes, and prior experience with child protection.
 - Interview notes will be taken on the interview and these kept on the candidate's file

6. Reference Checks

- All references are verified through direct contact with the referee.

UG School does not accept:

- References from relatives.
- For international candidates, reference authenticity is scrutinized, and professional email domains are required.
 - One of the references must be from the applicant's current or most recent employer. For teaching roles this must be the previous Headteacher / Principal / Director. If the current / most recent employment does / did not involve work with children, then the second reference should be from the employer with whom the applicant most recently worked with children.

- Referees will be contacted and asked whether they believe the applicant is suitable for the job for which they have applied, whether they have any reason to believe that the applicant is unsuitable to work with children and to confirm the content of the written reference. References will be verbally checked for authenticity and noted by HR in a special Reference Check Form.
- Please note that no questions will be asked about health or medical fitness prior to any offer of employment being made. At no time will questions be asked about the candidate's private life.
- The School does not accept open references, testimonials or references from relatives.
- A standard reference request form is used

7. Induction

- All new staff receive a comprehensive induction that includes:
- Safeguarding policies and procedures.
- Reporting and escalation protocols.
- Code of Conduct and whistleblowing guidance.
- An observation is conducted within the first two weeks of employment as part of the suitability for continued employment and within the statutory induction probationary period of employment

8. Verification and Record-Keeping

- A Single Central Record (SCR) is maintained, detailing:
 - Identity checks. This comprises a check of the applicant's passport and, where appropriate, the residency documentation
 - Criminal background checks.
 - Right to work documentation.
 - Safeguarding training completion.
 - Staff files include evidence of verification, cross-referenced with the SCR.
- All staff complete an annual self-declaration of good conduct.

- The DSL, or senior member of the safeguarding team, alongside the HR manager, will check the SCR and a selection of requested staff files periodically to ensure they are complete and in order. Once checked and deemed satisfactory, they will be signed, dated and a record of this will be made on the SCR.

Visiting Speakers

The Prevent Duty Guidance requires schools to have clear protocols for ensuring that any visiting speakers, whether invited by staff or by pupils, are suitable and appropriately supervised.

All visiting speakers will be subject to the School's usual visitors signing in protocol. This will include signing in and out at Reception, the wearing of a visitors' badge at all times and being escorted by a fully vetted member of staff between appointments.

The School will also obtain such formal or informal background information about a visiting speaker as is reasonable in the circumstances to decide whether to invite and/or permit a speaker to attend the School.

In fulfilling its Prevent Duty obligations the School does not discriminate on the grounds of race, color, nationality, ethnic or national origin, religion or religious belief, sex or sexual orientation, marital or civil partner status, disability or age.

Contractors and agency staff

Contractors engaged by the School must complete the same checks, to the extent possible, for their employees that the School is required to complete for its staff. The School requires confirmation via the signing of the addendum to the collaboration contract and a letter of assurance that these checks have been completed before employees of the Contractor can commence work at the School. This can be overseen by the relevant department at UG School. The DSL and Safeguarding Advisor to the Board are permitted to periodically audit the records of the checks performed, provided that no copies of such documentation are retained by the School.

9. Policy Review

- This policy is reviewed annually or in response to changes in COBIS guidance or local safeguarding legislation.

Pre-employment background checks – working instructions

UG School operates a safer recruitment policy and adopts safer recruitment procedures.

Once a job offer has been accepted, all recruitment checks need completing as soon as possible and certainly before the start of employment.

Pre-employment checks	What is to be done	Responsible department	Timeframe
Online presence check	Ideally before the first interview, but at least before the second interview. Public profiles that are checked include, but are not limited to: LinkedIn, YouTube, Facebook, X, Instagram, Google, websites. Any material that may be considered out of line with the 'Staff code of ethical practice' is flagged as a concern and will impact on the candidate's application.	HR	During recruitment process
CV/Application form & Interview notes	All employees must complete a UG School Application Form, even when a CV is sent. All gaps in employment should be noted and followed up at interview. Notes should be kept on an interview form and at least two safeguarding questions should be asked as part of the interview for any staff member in regulated activity.	Line Manager & HR (head/recruiter)	During recruitment process
2 References	Standard UG School written reference form should be sent to the nominated referees on the application form - including the Head of School from previous role or current employer and one other suitable referee from a separate role in most circumstances. When a written reference is received, a phone call should be made to check for every reference that it is from that person and - a note made 'Checked by phone' Date/Signature. This will match the date noted on the SCR. For all staff in regulated activity at least one full verbal reference must be completed on the verbal reference form with the applicant's Headteacher or Line Manager for non-teaching staff. For teaching staff, in most instances this is done by the Heads of School and will involve the current Headteacher as a reference – even if they are not a nominated referee. For non-teaching staff, this is managed by the HR department. References are taken up either before or after initial interviews or an offer.	HR and Heas of School	Within 7 days after the job offer has been accepted
Qualifications	All relevant qualification certificates. Date copy received should be written and signed on the file copy. This will match the date noted on the SCR. Qualifications and ICPC documents need to have an Apostille for Georgian immigration.	HR	Received from the candidate during recruitment process
Police check	Criminal record checks must be obtained from relevant countries, 'to the extent possible'. Copy of Police check (including Integrity Letter) issued by the Georgian Police Authority or, where possible, from any other country worked in/visited for longer than 3 months – on file with date received/signature. This will match the date noted on the SCR.	HR	Received from the candidate before commencing work, or within 1 month after the offer has been accepted whichever is shorter.

	If a police check from several years ago is not available – a trail to show that the applicant has made reasonable attempts to get one should suffice and recorded on a risk assessment. This should be placed on the staff file.		
ICPC	All new staff that have been resident in the UK for longer than 3 months or are UK passport holders will be asked to obtain an ICPC. They may also have copies of previous DBS police clearances. Copy of ICPC certificate/DBS will be placed on file with date received and original seen. . This will match the date noted on the SCR. Where a staff member has lived or worked in the European Union, the ECRIS may also be available as a further check.	HR	Received from the candidate within 1 month after the offer has been accepted. Must be received before commencing work with children, otherwise a risk assessment is required
ID	Passport/ID card. Date copy received should be written on the file copy. This will match the date noted on the SCR. Originals must be seen with a comment 'Original seen' dated on the file copy. Note to be added to SCR.	HR	Copy received from the candidate; original seen in the first employment week
Birth Certificate & Name Changes Check	Copy received from candidate of birth certificate, marriage certificate and any name change documents. This should be matched with any declared names changes or aliases as stated on the application form.	HR	Before employment starts
Medical Check	Dated form on file. This will match the date noted on the SCR.	HR	Before employment starts
Self-Declaration Form	Dated form on file. This will match the date noted on the SCR.	HR	Before employment starts; renewed annually
Data Protection Form (GDPR)	Dated form on file.	HR	Before employment starts

The Single Center Record (SCR) should be ongoing and always up to date. From the moment an offer goes, the SCR should be opened. The person should not start working with us until all the checks above are satisfied, or a risk assessment made, and the file reflects what is shown on the SCR.

A member of the school safeguarding team will audit a sample of new staff files at regular intervals in the academic year. The Head of School, the Safeguarding Advisor to Board/Governor or the proprietor will also audit a further sample of new staff files at least once each year. Evidence of this audit will be on the cover sheet of each staff file.

Delayed Checks and Risk Assessments

When suitability for employment checks are delayed, a risk assessment is undertaken of the member of staff if the decision is agreed by the Head to confirm the appointment. The risk assessment is discussed with the Head and may result in:

- a delay to the start date of the employee,
- a delay to access to campus,
- or additional supervision or monitoring until the matter is resolved.

In any of the cases above, the school will:

- review safeguards at least every two weeks;
- ensure the person in question and relevant line managers are informed of the safeguards in place;
- for evidential purposes, add a note to the single central register and keep evidence of the measures put in place.