Version: Approved Approved date: May 2019 Review date: April 2020

British School of Gran Canaria Safe Recruitment Policy Document



Contents

1. Scope	3
2. Definitions	
3. Rationale	3
4. Roles and Responsibilities	4
5. Recruitment and Selection Procedures	5
6. Single Central Register	7
7. Induction Programme and On-going Support	9
8. Visiting Speakers (and Prevent Duty)	9
Appendix A – Recruitment Checklists	10
Appendix B - Prevent Duty Guidance and the definition of 'extremism' set out in	
KCSIE and outlined in the school's Safeguarding Policy.	12
Annendix C - Notes on Background Checks	14

THE BRITISH SCHOOL OF GRAN CANARIA

SAFE RECRUITMENT POLICY

1. Scope

To cover all procedures and processes related to the recruitment and appointment of personnel to positions within the school. These processes extend to appointments, to honorary positions and invitations extended to visitors who are not closely supervised.

2. Definitions

Throughout this document the following words, terms and phrases have the following meanings:

The School – The British School of Gran Canaria, including the sites in Tafira and Maspalomas.

BSGC – The British School of Gran Canaria.

Governors – members of the school governing body.

Head - the Head of the British School of Gran Canaria

Heads of Sector (HOS) – line managers responsible for assigned sectors of the school i.e. Tafira Primary, South School and Secondary Senior Teachers.

Human Resources Supervisor – manager responsible for Human Resources within the school, including the supervision and monitoring of the Single Central Register.

DfE – Department for Education, the UK Government Department responsible for education.

KCSIE – The UK Government document - Keeping Children Safe in Education.

SCR – Single Central Register.

ICPC – International Child Protection Certificate that confirms that a person has no criminal convictions that preventing working with children.

EEA – European Economic Area.

3. Rationale

The British School of Gran Canaria is committed to safeguarding and promoting the welfare of all pupils in its care; the safe recruitment of staff is the first step in ensuring this standard of care. As an employer, the School expects all staff and volunteers to share this commitment.

The following policy is based on *DfE*: *Keeping Children Safe in Education (statutory Guidance),* 2018 and the Prevent Duty Guidance for England and Wales 2015 (the Prevent Duty Guidance) which have been adapted wherever necessary to take into account the fact that BSGC operates within Spain and is subject to Spanish laws and customs.

The BSGC aims to recruit the best possible staff based on their merits, abilities and suitability for the position and to ensure that all job applicants are considered equally and consistently.

4. Roles and Responsibilities

In order to ensure the effective implementation of this policy, specific responsibilities are outlined below.

It is the responsibility of the Governors to:

- Ensure the school has effective policies and procedures for the recruitment of all staff and volunteers in accordance with Spanish law and DfE guidance.
- Monitor the school's compliance with its policies and procedures in this area, including the identification of a Governor with assigned responsibility to supervise this monitoring.
- Monitor the School's Single Central Register.
- Ensure the periodic review and update of the school's Safe Recruitment Policy.

It is the responsibility of the Head to:

- Oversee the process and policy implementation.
- Maintain the SCR.
- When required documentation is lacking, deny permission for a new appointee to begin work.

It is the responsibility of the Human Resources Supervisor to:

- Oversee and monitor the collection of key documentation prior to the appointment of all school personnel.
- Oversee and monitor the collection of key documentation for any interns, volunteers, extracurricular staff and governors prior to them commencing their tenure in the school.
- Provide support and guidance that will support the Safe Recruitment Policy to staff on appointment, during their induction and throughout their BSGC careers.
- Before a new appointee is permitted to start work, notify the Head and relevant Heads of Sector if any required documentation is lacking.

It is the responsibility of the Head, Heads of Sector, school's Human Resources Supervisor and staff with responsibility for administration, maintenance, kitchen and cleaning to:

- Understand this policy document, and failing that, to ask the Head for training.
- Ensure that the School implements the safe recruitment procedures set out in this policy.
- Assume responsibility for the collection and collation of assigned background checks and documentation identified within this policy for staff and volunteers working within their area of responsibility.
- Monitor the compliance of contractors and agencies who work within their area of responsibility with these expectations.
- Promote the welfare of children and young people at every stage of the procedure.

5. Recruitment and Selection Procedures

<u>Searching and Advertising</u> – the school uses local and international recruitment avenues and agencies to share information on school vacancies in order to solicit high quality and appropriate applications for school posts.

<u>Application Forms</u> – a BSGC Application Form must be completed by all applicants prior to being employed by the school. The application form provides the school with details on the applicant's academic and employment history. Any gaps or discrepancies in their employment history require explanation.

There are two BSGC Application Forms – 'Teaching' and 'Support'. Teachers, assistant teachers and supply teachers use the Teaching Form. The Support Application Form is for Administration, Maintenance, Kitchen and After School Activities posts. Governors and student teachers will submit a full and current CV.

In addition to background and previous employment information, the Application Form contains signed declarations from the applicant pertaining to:

- Acceptance that all required documentation must be presented prior to starting work at the school.
- Self-certification of medical fitness for their position.
- Acknowledgement of GDPR expectations.
- Declaration regarding previous criminal convictions.

The applicant must also confirm that they are not barred or prohibited from working with children as it is unlawful for the school to employ anyone who is barred in this regard and it is a criminal offence for any person who is barred to apply for a position at a school.

In addition to the above declarations, the Application Form also clarifies that providing false information is an offence and could result in an application being rejected, summarily dismissed if already appointed, and that they could be referred to the police and/or relevant authorities.

The Application Form must be signed as firm confirmation of the above declarations. As many applicants are not living on Gran Canaria and these forms are sent electronically, this signing can be done on arrival to the island, before starting work at the school.

<u>Job Descriptions</u> - A job description is a key document in the recruitment process as it clearly and accurately sets out the duties and responsibilities of the job role and therefore is provided for all posts.

<u>References</u> - References are required for all appointees using the BSGC format and are requested after shortlisting. The only exception being when an applicant indicates on their application form that they do not wish their current employer to be contacted at that stage. In such cases, the reference will be sought after interview. All offers of employment will be subject to the receipt of a

minimum of two references that are considered satisfactory by the school. Should a telephone reference be requested it must be recorded on the school Telephone Reference Form.

The following guidelines clarify the school reference expectations.

- One of the references must be from the applicant's current or most recent employer if they
 have been previously employed. Someone who has not been previously employed will
 provide one reference from their last educational institution.
- Posts directly related to working with children must include a reference from the employer with whom the applicant most recently worked with children.
- The referee must not be a relative.
- References are requested directly from the referee by the school.
- The reference requests objective and factual information to support appointment decisions.
- Referees will need to state whether they believe the applicant is suitable for the job for which they have applied and if there are any reasons to believe that the applicant is unsuitable to work with children.
- Referees will have to confirm that the applicant has not been radicalised and that they do not support terrorism or any form of 'extremism'.

Any discrepancies or anomalies in a reference are followed up with a phone call to the referee to clarify the concern.

The School does not accept open references, testimonials or references from relatives.

<u>Interviews</u> – Whenever possible the school will conduct face-to-face, in person interviews, and a minimum of two interviewers will see the applicants for the vacant position. However, as Skype is often used, the face-to-face nature of an interview maybe via webcam. The interview process will explore the applicant's ability to fulfil the job description and school requirements. It will enable the interviewers to explore any anomalies or gaps in an applicant's employment history and ensure they meet safeguarding expectations.

If there are any past disciplinary action or allegations, cautions or convictions, these will be raised during the interview process and considered in the circumstance of the individual case.

<u>Background Checks</u> - In accordance with the recommendations set out in KCSIE, the school carries out a number of pre-employment checks for all prospective employees. If an offer of employment is made following the formal interview, then this will be conditional on the following:

- Completed BSGC Application Form.
- Receipt of two references that the school considers satisfactory and confirms the applicant's suitability to work within a school setting.
- Verification of the applicant's identity, right to work in Spain and qualifications. In all cases, only original documents are accepted, with the school taking photocopies.
- Spanish background clearance via the 'Certificado de Delitos de Naturaleza Sexual'.
- If the applicant comes from the UK an ICPC will be required.

 Non Spain or UK nationals, or those who have previously worked in another country, are required to provide a police background check from that country of similar status to the ICPC and 'Certificado de Delitos de Naturaleza Sexual'.

For positions that involve teaching work, the school must be absolutely satisfied that the applicant is not, and has never been, subject to a sanction or current investigation that prevents working in a school or which, in the school's opinion, renders the applicant unsuitable to work at BSGC. Therefore, in addition to the above requirements teachers, assistant teachers and supply teachers must provide the following information, or agree for the school to request the necessary background checks. (See Appendix C for additional information on these checks.)

- International Child Protection Certificate (ICPC) for teaching staff with a UK background.
- Teaching staff contracted from outside of the UK must provide a verified background check from their current country of residence/employment that is recognised and deemed equivalent to the ICPC and Certificado de Delitos de Naturaleza Sexual checks
- Spanish background clearance via the 'Certificado de Delitos de Naturaleza Sexual'
- Children's Barred List.
- Prohibition from Teaching Check.
- EEA check for prohibition from teaching outside of UK, in the EEA.
- Prohibition from Management Check Section 128.

6. Single Central Register (SCR)

The SCR is the school's digital register of information and documentation pertaining to the recruitment and background checks for:

- All school employees;
- Anyone employed on a temporary basis as substitute cover for school staff;
- Anyone who enters the school and is in regular contact with children. This includes
 Governors, interns and university student placements and those contracted to provide
 additional teaching or instruction for pupils but who are not BSGC staff e.g. sports coaches.

The SCR is an electronic register recording the collection dates of all the required documentation prior to work commencement. A physical file storing the collated documentations, forms, photocopies and signed checklists is maintained in addition to the SCR.

In order to support the efficient and timely collection of all documentation, a Recruitment Checklist (Appendix A) is used to record and monitor the Safe Recruitment process for each employee, volunteer and governor. The use of this checklist guides and clarifies responsibilities for BSGC staff involved with the process and in order to ensure that these background checks are complete <u>before</u> employment, or commencement of a position within the school.

The first section of the Recruitment Checklist is completed by the line-manager, with the second part being the responsibility of the Human Resources supervisor. As outlined above, the various

positions within the school require different documentation and the requirements are detailed in the table below.

BSGC App	pointment Responsibility	, G	iric	d fo	or (Ga	th	er	ing	g Do	00	cun	nen	tatio	on f	or S	CR	
												All	Other	Europe		UK Only		
Role to be Appointed	Staff Responsible		Application Form	Reference 1	Reference 2	Medical Form		Identification verified	Right to work in Spain	Qualificaitons		Delitos Sexuales	Other country checks	EEA - school requested	DBS or ICPC - teacher requested	Barred List 99	Prohibition from Teaching	Prohibition from Management - 128
Teacher	Senior Managers - JC/AB/RH/RC	11	М	М	М	М		HR	HR	HR		HR	*	HR	HR	HR	HR	HR
Assistant Teacher	Senior Managers - AB/RH/JP		М	М	М	М		HR	HR	HR	Ī	HR	*	*	*	*	*	
Supply Teacher	Senior Managers - JC/AB/RH/RC	\prod	М	М	М	М		HR	HR	HR		HR	*	HR	HR	HR	HR	
Activities	Senior Managers - AB/RH/JP	1	М	М	М	М		HR	HR	HR	Ī	HR			*	*		
Student, Intern	Senior Managers - AB (South), JP (Tafira)		М	М	М	М		HR				HR	*		*	*		
Volunteer	Senior and Line Managers - AB/RH/JP/HG		М	М	М	М		HR				HR	*	*				
Governor	Head - JC	П		М	М			HR			Ī	HR	*			*		*
Admin Support	Senior and Line Managers - JC/AB/MR/HG	1 [М	М	М	М		HR	HR	HR	1	HR	*			*		*
Maintenance, Kitchen, Cleaning	Senior and Line Managers - JC/AB/HG/CM/AF	П	М	М	М	М		HR	HR	HR	İ	HR						
Supply (other)	Senior and Line Managers - AB/HG/MR/CM/AF		М	М	М	М		HR	HR			HR						
			М		HR	Human Resources						*	Dependant on previous living locations					

On receipt of each identified document, the person responsible must sign and date the Checklist. On completion of their area of responsibility, the line manager must sign that they have completed their section of the checklist before passing on to the next responsible person.

When all information and documentation is collected and signed-off, the Human Resources supervisor will pass the documentation and checklist to the Head for final verification that the process has been completed appropriately. The Head will enter the date of collected of each required item into the electronic SCR and store the hardcopy file of documents in the secure filing cabinet.

Each term the assigned Governor for Safe Recruitment will monitor the implementation of the Policy and the maintenance of an accurate and up-to-date SCR, reporting to the Board of Governors on compliance and any identified issues.

<u>Ongoing Employment</u> – BSGC recognises that safe recruitment and selection is part of the school's larger policy framework. The school, therefore, provides ongoing training and support for all staff that includes an Induction Programme and a Performance Development Process. Intrinsically linked to the Safe Recruitment Policy, and read in conjunction, are the following school policies:

- Child Protection and Safeguarding Policy.
- Safe Working Practice Policy.
- Health and Safety Policy.
- Concerns and Complaints Policy.

- Whistle Blowing Policy.
- Anti-Bullying Policy

7. Induction Programme and On-going Support

All new employees will be given an induction programme that will identify and clarify school policies and procedures, including the Child Protection Policy and Safe Working Practice Policy, and make clear the expectations that will govern how staff carry out their roles and responsibilities.

All new teaching staff, as part of Induction, will participate in the school's Performance Development Process that includes professional reflection and self-evaluation, lesson observations and feedback meetings. These opportunities provide a forum from which professional expectations can be clarified and aligned, and professional judgements made as to the suitability of a person.

Regular awareness-raising and training on Safeguarding and Child Protection is a constant feature of the school, as is the desire to encourage vigilance and on openness for sharing concerns without reproach.

8. Visiting Speakers (and Prevent Duty)

The Prevent Duty Guidance (2015) requires the school to have clear protocols to ensure visiting speakers are suitable for a school and the age of the students involved, and that they are always appropriately supervised. When considering and inviting in a visitor, the school will always pay close attention to the Prevent Duty Guidance (including the definitions of extremism and radicalisation) and the guidance outlined in the school's Child Protection and Safeguarding Policy (See Appendix B).

The school does not require full background checks for visiting speakers who do not engage in regulated activity or who are infrequent visitors. However, the school will obtain reasonable formal or informal background information about them in order to decide whether to invite/ permit them to attend the school. If the school is happy with the information gleaned, the visitor will be asked to sign an agreement form that clearly states the expectations of the ethos of the school and what is acceptable conduct when interacting with students (see BSGC Guidance for Visitors form).

All visiting speakers will follow the school's protocols, including signing in and out at Reception, wearing a visitor's badge at all times and being escorted by a member of BSGC staff at all times.

Appendix A – Recruitment Checklists

V													
		Appointee's Name											
		Post											
		Manager Responsible											
		Date Process Started											
M	an	agement Responsibility	Date	Comments									
		Application Form											
		Reference 1											
		Reference 2											
		Informed about all required docs											
		GPDR Agreement											
		Medical Verification											
		Applicant signs BSGC Application Form											
		Process passed to HR		Signature									
		HR Responsibility	Date	Comments									
ork		Identification verified	50										
Right to work		Right to work in Spain											
Right		Qualifications											
_		Delitos Sexuales											
Criminal		ICPC											
Ö		Overseas Check											
Teaching Authorisation		Prohibition from Teaching											
		Prohibition from Management											
		EEA											
Teac		Barred List 99											
CP Policy sent													
	Cor	mplete for Head's Authorisation		Signature									
	Н	ead's Authorisation	Date	Comments									
	Ful	I Documentation to Headmaster											
	Cor	ntract to commence on											
	He	ad's Authorisation		Signature									

Appendix B - Prevent Duty Guidance and the definition of 'extremism' set out in KCSIE and outlined in the school's Safeguarding Policy

Prevent Duty Guidance (2015)

Key definitions (adapted):

Extremism: Vocal or active opposition to fundamental democratic values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.

Prevention: Reducing or eliminating the risk of individuals becoming involved in terrorism [...].

Radicalisation: The process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Vulnerability: open to moral or ideological attack or being susceptible to radicalisation.

In order for schools and childcare providers to fulfil the Prevent Duty, it is essential that staff are able to identify children who may be vulnerable to radicalisation, and know what to do when they are identified. Protecting children from the risk of radicalisation should be seen as part of schools' and childcare providers' wider safeguarding duties, and is similar in nature to protecting children from other harms (e.g., drugs, gangs, neglect, sexual exploitation), whether these come from within their family or are the product of outside influences. Schools and childcare providers can also build pupils' resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views. It is important to emphasise that the Prevent duty is not intended to stop pupils debating controversial issues. On the contrary, schools should provide a safe space in which children, young people and staff can understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments. For Early Years childcare providers, the statutory framework for the Early Years Foundation Stage sets standards for learning, development and care for children from 0-5, thereby assisting their personal, social and emotional development and understanding of the world.

BSGC Safeguarding Policy Guidelines

At BSGC we recognise that children must be protected from being radicalised or exposed to extremist views. All staff are asked to maintain an attitude of "it could happen here" in relation to vulnerability to radicalisation.

The school will ensure that staff have an understanding of what radicalisation and extremism are and why we need to be vigilant in school. This will be a part of any formal training on safeguarding provided to staff. Staff will be briefed and updated (at least annually) on their duty to report those students that may be at risk of being radicalised or exposed to extremism to the DSLs.

The Head and the DSLs will assess the risk of pupils being drawn into extremist views. This risk assessment will consider the school's curriculum, the use of school premises by external agencies and the systems in place for keeping pupils safe from extremist material when accessing the Internet in our school by using effective filtering and monitoring the correct implementation of the school's E-Safety Policy.

Visitors to the school will be considered carefully and vetted in order to ensure they do not have any obvious extremist views or affiliations. Visitors will be asked to sign a document to ensure that they understand the School's stance on radical and extreme views. Please refer to the School's Guidance on Visitors for further information.

The school will ensure that the DSLs undertake Prevent awareness training and are able to provide advice and support to other members of staff on protecting children from the risk of radicalisation.

The DSLs must be used as a first point of contact for any safeguarding concerns in our school. This also applies to any concerns about a child that may be at risk of radicalisation. The usual Safeguarding and Child Protection procedures will be followed in these cases by the DSLs.

Appendix C – Notes on Background Checks

The International Child Protection Certificate (ICPC)

The ICPC is a criminal records check for UK nationals, or non-UK nationals who have previously lived in the UK, intending to work with children overseas. Many international schools and organisations around the world employ people from the UK as teachers, workers and volunteers. A police criminal record check is now available for UK nationals, and people who have resided in the UK, who are looking for work or are already employed overseas working with children.

In a joint initiative, the National Crime Agency's Child Exploitation and Online Protection Command (NCA-CEOP) and ACRO have developed the International Child Protection Certificate (ICPC) to help protect children from offenders who travel overseas to abuse vulnerable children through employment, volunteering and charity work.

The ICPC is a criminal records check against police and intelligence databases in the UK. The ICPC is similar to the Disclosure and Barring Service (DBS) check (formerly CRB check) that is required for anyone working professionally with children in England and Wales. When used alongside robust safeguarding procedures, the ICPC enables overseas schools and organisations to make informed risk-based decisions about whether the people they employ are suitable to work with children. The ICPC can be requested for existing employees or while recruiting employees.

The ICPC is issued following a check of relevant information held by the police and other law enforcement agencies in the UK. Certificates are prepared in accordance with the ACRO step-down model. This model is also applied to Northern Irish, military and overseas convictions. Please note that certificates will contain impending prosecutions and offences that are under investigation.

The certificate may also contain criminal conviction information about offences committed in other countries where such information has been disclosed to the UK through existing exchange mechanisms. Additionally, as part of the ICPC process, NCA-CEOP will make an assessment of available intelligence and information and disclose on the certificate anything it deems relevant in the interest of child protection.

The check confirms the applicant could be prohibited from working with the educational establishment. Local Authorities, Schools and further education institutions must check if a person has been prohibited before confirming the person's appointment.

EEA Checks

The EEA Online service covers the requirements for Ofsted and the Independent Schools Inspectorate (ISI) requirements.

The search ascertains if a teacher who has trained or worked in the European Economic Area (EEA) has received any restrictions on their teaching. APCS provide a certificate to indicate the check has been completed and you can then enter the dates of the check on your single central record (SCR).

The EEA check covers all the countries of the EU, plus Iceland, Liechtenstein and Norway.

Certificado de Delitos de Naturaleza Sexual

This certificate, issued in Spain includes information on background checks completed in other EU countries (and also in countries which are members of the Council of Europe).

Spanish law (1110/2015) states:

El Registro Central de Delincuentes Sexuales constituye un sistema de información, de carácter no público y gratuito, relativo a la identidad, perfil genético, penas y medidas de seguridad impuestas a aquellas personas condenadas en sentencia firme por cualquier delito contra la libertad e indemnidad sexuales o por trata de seres humanos con fines de explotación sexual, incluyendo la pornografía, regulados en la Ley Orgánica 10/1995, de 23 de noviembre, del Código Penal, con independencia de la edad de la víctima. Esta información se referirá a las condenas dictadas tanto en España como en otros países, en particular los Estados miembros de la Unión Europea y del Consejo de Europa.

Prohibition from Teaching

This check confirms that the teacher is not excluded and prohibited from teaching.

Prohibition from Management

Also known as the Section 128, this checks that the person has not been prohibited from positions of management in schools.