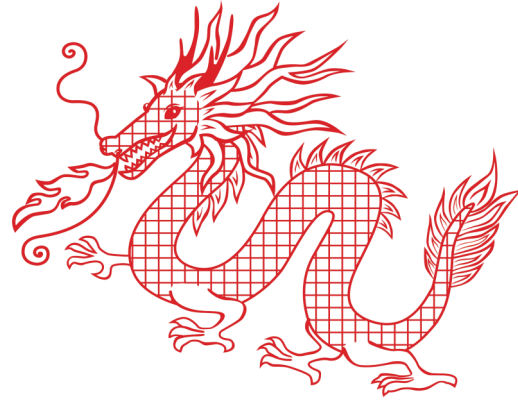


KELLETT SCHOOL HONG KONG

Safer Recruitment Policy

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KELLETT SCHOOL HONG KONG

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1 AIMS

- 1.1 To outline the context of safer recruitment
- 1.2 To ensure robust procedures are in place for the recruitment process.
- 1.3 To use the procedures as part of a toolkit to recruit safely.
- 1.4 To create and maintain a culture of ongoing vigilance.

2 PREAMBLE

- 2.1 This policy complies with the Education Ordinance Cap 279 (Hong Kong), to the extent that it is applicable regarding the screening of new employees and volunteers.
- 2.2 Reference has been given to the following legislation, regulations and guidelines to the extent it may be relevant to this policy:
 - 2.2.1 [Keeping Children Safe in Education 2025](#)
 - 2.2.2 [‘Regulated Activity in relation to children scope – factual note by HM Government, DfE, 2012](#)
 - 2.2.3 [Regulated activity with children guidance leaflets updated 1 September 2025](#)
 - 2.2.4 [Standards for British Schools Overseas, August 2023](#)
 - 2.2.5 [Independent Schools Inspection Framework from 1 September 2023](#)
 - 2.2.6 [Rehabilitation of Offenders Act](#)
 - 2.2.7 [The Teachers' Disciplinary \(England\) Regulations 2012](#)
 - 2.2.8 [The Safeguarding Vulnerable Groups \(SVG\) Act 2006](#)

3 POLICY STATEMENT

- 3.1 Kellett School has a duty to safeguard students (see [Child Protection and Safeguarding Policy](#))
- 3.2 The school is committed to safeguarding and promoting the safety and welfare of all its students. In this context, our aim is to ensure that the policies and the procedures we follow in the selection and appointment of staff and volunteers comply with the latest regulations and guidance on safer recruitment, and that the principles of safer recruitment are embedded in our collective thinking and practice throughout the school.

- 3.3 The recruitment of staff that are committed to the principles of safeguarding is a key part of this strategy.
- 3.4 The school recruits such staff through a process that sets expectations for candidate selection, uses an appropriate application procedure, sets selection criteria, undertakes on-line checks as part of short-listing, obtains useful references and inducts new staff properly. Following this process helps to deter applicants within appropriate motivation, prevents opportunity for abuse and assists in the early detection of any inappropriate behaviour.
- 3.5 The school notes the well-developed English law in relation to safeguarding. Under the law of England and Wales, "Regulated Activity" is work that a barred person must not do and is defined in the Safeguarding Vulnerable Groups (SVG) Act 2006 (as amended).
- 3.5.1 In this regard, the U.K. Government note 'Regulated activity in relation to children: Scope' outlines that a member of staff will be considered to be engaging in 'regulated activity' if as a result of their work they:
- (a) will be responsible, on a regular basis in a school or college, for teaching, training instructing, caring for or supervising children; or
 - (b) will carry out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
 - (c) engage in intimate or personal care or overnight activity, even if this happens only once.

Regulated activity includes (only if done regularly):

Teaching, training, instructing, caring for or supervising children if the person is unsupervised, or providing advice or guidance on well-being, or driving a vehicle only for children, work for a limited range of establishments (known as 'specified places', which include schools and colleges), with the opportunity for contact with children, but not including work done by supervised volunteers.

4 SAFER RECRUITMENT CHECKS - HONG KONG

4.1 School Employees

- 4.1.1 In line with international best practice, the School requires staff to have a full and unbroken criminal-record history. Whilst the School asks all new employees to endeavour to provide evidence of police checks from every country in which they have worked and completed their teacher training, it is recognised that the

international nature of Hong Kong means that the School attracts applications from a range of countries around the world, many of whom do not have developed safeguarding and vetting procedures. Thus, it is not always possible to document a full career of police checks.

- a) The school contracts with external agencies to conduct thorough online social media searches as part of the short-listing process. We will inform short-listed candidates that this process will be undertaken.
- b) All new employees who are already resident in Hong Kong, must provide a Hong Kong Police clearance (Sexual Conviction Record Check). These are valid for a period of 18 months. Police checks are requested in English.
- c) All new employees who are joining the School directly from the UK will provide the school with an up-to-date International Child Protection Certificate (ICPC) check (within the same calendar year) from ACRO. All new employees joining the School from another country must request a criminal/police check from their current country of residence. This needs to be requested while they are still resident.
- d) The school will conduct a Prohibition Order Check via COBIS (List of those 'struck off' the Teaching Register) on all teaching staff who have ever lived or worked in the UK as an adult. The teacher's permission will be sought beforehand, as per the guidance.
- e) All employees who have worked and lived in the UK will have an up to date ICPC on file.

4.2 Others who work at the school – Non-employee Register

4.2.1 In addition to its employees, the school engages a number of contractors who provide services to the school. These include Catering, Security, Swimming Coaches, Peripatetic Music Teachers, and individuals and organisations who run Clubs for the pupils.

4.2.2 Police Checks and Safeguarding Training must be renewed every year.

4.3 Others who volunteer or visit the school

4.3.1 **Any Volunteer or Visitor who has unsupervised contact**

- a) Hong Kong Police Checks are only available to employees of an organisation; therefore, it is not possible for us to vet volunteers in this way.

- b) All volunteers are required to make a formal declaration that they do not have any criminal convictions that would bar them from working with children.

4.3.2 Parent/ Volunteer helpers or visitors who have **regular contact** (at least three times in a month) with students.

- a) For avoidance of doubt a Parent/Volunteer may be in school but never left alone with students. They must undertake Safeguarding/Child Protection training.
- b) The School will NOT conduct Police checks on Parent/ Volunteer helpers for one-off events (such as helping on a school trip). This is because Parent / Volunteer helpers are never alone with children.
- c) All volunteers who have regular contact are required to make a formal declaration that they do not any criminal convictions that would bar them from working with children.

4.3.3 Safeguarding Training must be renewed every Year.

4.4 Training in Safer Recruitment

4.4.1 All employees who are involved in the pre-appointment of a candidate will undergo Safer Recruitment Training.

4.4.2 At least one member of the selection panel for any appointment made at the School will have successfully completed training in Safer Recruitment within the last two years.

4.4.3 All staff at the School who receive training in Safer Recruitment for this purpose will be expected to renew their training every two years.

Role	Timeframe	Re-Training Period
People and Culture Team	Induction Period (1 month)	Every year
ESLT/ SLT	Within first term	Every year
One Governor	Every 2 years	Every 2 years

5 THE RECRUITMENT PROCESS

- 5.1 The recruitment process should be planned by the People and Culture team and Senior Leadership Team, at least by the beginning of the academic year.
- 5.2 Job Descriptions and Person Specifications should be agreed prior to advertising vacancies.
- 5.3 Job advertisements should encourage suitable applicants and deter those who are unsuitable.

6 HIGHLIGHTING SAFEGUARDING IN ADVERTISEMENTS AND POST DETAILS

- 6.1 Advertisements for staff appointments, whether paid or unpaid, will normally include the following statement:

"Kellett School is committed to safeguarding and promoting the welfare of all the students in our care and expects all applicants to share this commitment. We follow safer recruitment practices, and all appointments are subject to an interview, identity checks, criminal record checks, and successful references."

- 6.2 All statements of 'Post details' which are provided for prospective applicants will contain the following statement:

'Safer Recruitment: Kellett School is committed to safeguarding and promoting the welfare of all its students, and this is a responsibility that is shared by all members of staff. The successful candidate will be subject to ICPC from ACRO or equivalent police check.'

7 APPLICATION FORM

- 7.1 Kellett School application forms must be completed by all applicants, CVs may be used but only as supplementary information.
- 7.2 Applicants are supplied with Kellett School's Child Protection Policy, and policy on employing ex-offenders.
- 7.3 The **application form** will include (but not be limited to)
 - 7.3.1 Personal and contact information
 - 7.3.2 Current employment
 - 7.3.3 Full employment and volunteering history since leaving education
 - 7.3.4 Educational history and qualifications

7.3.5 Details of referees including the current employer

7.3.6 A personal statement demonstrating how the applicant meets the advertised criteria

8 SHORTLISTING

8.1 **Shortlisting** must be carried out by more than one person and be consistent and thorough.

8.2 Shortlisted candidates are asked to complete a self-declaration of their criminal record.

8.3 During shortlisting, checks should be made on

8.3.1 A properly completed form

8.3.2 Any inconsistent information

8.3.3 Information relevant to the advertised criteria

8.3.4 Gaps in employment or voluntary work since leaving education

8.3.5 Criminal records declaration

8.3.6 Review of on-line social media checks

9 REFERENCES

9.1 Wherever possible **references** should be obtained before interviewing.

9.2 At least two referees are required, three for teaching posts;

9.3 The current employer must be one referee;

9.4 References should be from employment in the last five years wherever possible;

9.5 Reference should be compared with information on the application form;

9.5.1 Referees should be asked about the applicant's suitability working with children;

9.5.2 Referees should be asked about any disciplinary matters of which they are aware;

9.5.3 Reference should be followed up with a call prior to an offer of employment;

9.5.4 Open references supplied by the applicants should not be accepted;

9.5.5 Discrepancies between verbal and written references should not be ignored.

10 SAFEGUARDING-RELATED QUESTIONS DURING THE SELECTION PROCESS

- 10.1 In the course of selection interviews, and among other things, candidates will be expected to be ready to:
 - 10.1.1 explain any gaps in employment;
 - 10.1.2 explain satisfactorily any anomalies or discrepancies in the information available to the panel;
 - 10.1.3 declare any information that is likely to appear on the ICPC disclosure or other police checks;
 - 10.1.4 demonstrate their ability to safeguard and protect the welfare of children and young people and their ability and willingness to promote fundamental British values.

11 INTERVIEWS

- 11.1 At least one member of any interview panel should hold a certified Safer Recruitment qualification.
- 11.2 Interview questions should be planned well and include questions to deter unsuitable applicants.
- 11.3 Candidates should provide documentary evidence of their identity at the interview.
- 11.4 Candidates should provide original documents to verify educational and professional qualifications.
- 11.5 All information including the application form, face to face interview and reference should be considered before making an offer of employment.
- 11.6 Other selection tools may be used such as discussion groups, psychometric tests, in tray exercises, observations and candidate presentations.

12 JOB OFFERS

- 12.1 Unconditional offers will not be made to candidates. Written offers of employment should be made verification of the candidate's identity, eligibility to work in Hong Kong, satisfactory references and verification of qualifications.

13 ALLOWING A NEW MEMBER OF STAFF TO START WORK BEFORE RECEIPT OF OR RELEVANT POLICE CHECK

13.1 Overview

- 13.1.1 Offers of employment at the School are always predicated upon the receipt of a satisfactory ICPC disclosure / relevant police check(s).
- 13.1.2 We conduct our own checks even where the new member of staff has a current disclosure from another school.
- 13.1.3 The following standard wording appears in all our offers of employment. It makes clear that the appointment is not definitively confirmed until such time as the disclosure has been received.

‘Please note that this offer of employment is subject to a satisfactory outcome to the ICPC / police checks that, as a school, we are obliged to request on all our staff, and that the school is entitled to end this employment without notice in the event of any details resulting from the ICPC / police checks which in the school’s opinion render you unsuitable for employment involving work with children and young people. The offer is also subject to satisfactory receipt of proof of qualifications and (where relevant) evidence of meeting visa requirements conferring the right to work in Hong Kong.’

- 13.1.4 The ICPC is preferred over a DBS for anyone who lives or who has lived, in the UK and who is looking to work with children overseas. An ICPC acts as a criminal records check. An ICPC confirms whether or not the applicant has a criminal history and provide details, including relevant conviction and non-conviction data
 - The certificate is produced in two parts:
 - Part 1 - disclosure of any convictions, impending prosecutions, cautions, reprimands, warnings and current investigations held on UK databases
 - Part 1 - disclosure of any convictions, impending prosecutions, cautions, reprimands, warnings and current investigations held on UK databases

13.2 Starting work

- 13.2.1 We will normally seek to ensure that we have received the ICPC /police check before a new member of staff takes up his or her position. Exceptionally, however, there may be a strong operational need for a newly appointed member of staff to take up his or her position before we have received the disclosure/check. Under current regulations, ‘a short period of work is allowed under controlled conditions, at the head’s discretion’ (ISI Handbook for the inspection of schools, April 2015 – Part 4, paragraph 216). In such circumstances, the following steps will, in all cases, be followed before the member of staff is allowed to start work:

13.2.2 The appointment will not be confirmed, in the sense that it will explicitly remain subject to a satisfactory outcome of the ICPC /Police checks. The standard wording cited above which appears in all offers of employment covers this point.

- d) Where possible the ICPC/Police check application will be submitted before the new member of staff starts work.
- e) In the case of a newly appointed member of the teaching staff, a check is conducted against the Prohibited List to ensure that the candidate is not subject to a prohibition order issued by the Secretary of State. The check is carried out using the Employer Access Online service, 'Prohibited List'.
- f) A note of the above checks is made on the Single Central Register of appointments (SCR).
- g) At least two satisfactory references must have been received and verified.
- h) A written risk assessment is put in place and approved by the Director in each warranted case. The risk assessment will be kept on the relevant person's HR file.
- i) The risk assessment sets out appropriate safeguards to be put in place, such as appropriate supervision.
- j) The member of staff concerned is informed of these safeguards.
- k) The safeguards are reviewed regularly, at least every two weeks, until the relevant ICPC /Police check is received.

14 STAFF INDUCTION

- 14.1 The induction process should set out expectations for acceptable and unacceptable behaviours of staff towards students and include information regarding the schools Safeguarding Policy.
- 14.2 Staff or students who raise concerns about an individual after employment will be supported and the school will take action over those concerns.