

SAFER RECRUITMENT POLICY 26-27

International School of Creative Science
Nad al Sheba



DOCUMENT INFORMATION

Field	Detail
Created by	Principal
Created	November 2022
Review	November 2026
Last Review	November 2027
Reviewed by	Chair of Governors
Review Cycle	Annual

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INTRODUCTION

The International School of Creative Science (ISCS NAS) recognises that safeguarding children is a fundamental duty of every adult in the school community. Safer recruitment is central to fulfilling that duty and is embedded in every stage of our recruitment and selection processes.

This policy sets out how ISCS NAS will recruit, appoint, and induct staff in a way that protects children and young people from harm. It aligns with:

- the requirements of the Knowledge and Human Development Authority (KHDA), including the Teacher Recruitment and Mobility Guidelines (2025) and the Technical Guide on Staff Deregistration;
- the regulations of the Ministry of Education (MoE) and UAE Labour Law;
- the standards of the British Schools Overseas (BSO) inspection framework; and
- international best practice as reflected in Keeping Children Safe in Education 2026 (KCSIE), which was published on 7 July 2026 and came into force on 1 September 2026.

The policy also reflects the ethos and Barakah culture of ISCS NAS, which emphasise integrity, dignity, fairness and respect. All recruitment decisions are taken with the best interests of children at heart and with respect for the cultural values of Dubai and the United Arab Emirates.

The procedures described in this document apply to the recruitment of all staff — including teachers, leaders, administrators, support staff, peripatetic staff, volunteers and contractors — whether recruited locally or from overseas.

ISCS NAS acknowledges its statutory obligation to keep complete and auditable recruitment records and to cooperate fully with KHDA audits and BSO inspections. The school will regularly review and update this policy whenever KHDA or MoE guidance changes or when new inspection requirements are introduced.

PURPOSE

To set out a clear, consistent framework for safer recruitment across ISCS NAS, ensuring only candidates who meet suitability, safeguarding, qualification, and good-standing requirements are appointed, and that all due diligence records are complete and auditable.

POLICY STATEMENTS

The International School of Creative Science (ISCS NAS) is committed to recruiting and appointing staff who share the school's ethos and Barakah culture and who meet the highest standards of professional and personal conduct. Safeguarding the welfare of children is at the heart of every recruitment decision. Our recruitment practices ensure equality regardless of gender, nationality, disability or belief.

In line with the KHDA Teacher Recruitment and Mobility Guidelines (2025), the Technical Guide on Staff Deregistration, the Ministry of Education regulations, British Schools Overseas (BSO) inspection standards, and the guidance of Keeping Children Safe in Education (KCSIE), the school will:

- ensure that all job advertisements and recruitment materials clearly state the school's commitment to safeguarding and safer recruitment;
- require every applicant to provide a full employment history with explanations for any gaps;
- complete all mandatory pre-employment checks, including identity verification, qualifications and professional registration, criminal record checks in all relevant jurisdictions, two professional references, and an online/social media screening;
- check the KHDA Deregistration List before appointment and report to KHDA within 24 hours of any formal warning, dismissal, or resignation linked to safeguarding or misconduct;
- require all staff to sign both the KHDA Code of Conduct and the ISCS Code of Conduct before starting duties;
- ensure no teacher begins work without a valid KHDA Appointment Notice and that mobility procedures, including the 90-day rule and the KHDA Exit Survey, are followed;
- provide all new teachers with KHDA-mandated induction training on safeguarding, health and safety, and working with Students of Determination;
- maintain full, auditable records of recruitment and vetting checks in compliance with KHDA, MoE, and data-protection requirements.

AIMS

The aim of this policy is to ensure that the International School of Creative Science (ISCS NAS) has safer recruitment procedures that place the safeguarding and welfare of children and young people at the centre of all recruitment activity.

This policy aims to:

- deter and prevent unsuitable individuals from working with children by applying robust and consistent recruitment checks;
- ensure that recruitment processes are fair, transparent, and free from discrimination or bias;
- comply fully with KHDA Teacher Recruitment and Mobility Guidelines (2025), including the Appointment Notice system, the 90-day mobility rule, and the requirement for departing staff to complete the KHDA Exit Survey before joining another school;
- require all candidates to undergo full pre-employment checks, including identity verification, attested qualifications, professional registration, criminal record checks in all relevant jurisdictions, two verified references, and online or social-media screening;
- ensure that no staff member begins duties without a valid KHDA Appointment Notice and signed KHDA and ISCS Codes of Conduct;
- provide KHDA-mandated induction professional development for all new teachers, including safeguarding, health and safety, the KHDA Code of Conduct, and working with Students of Determination;
- maintain a Single Central Record and complete personnel files containing all evidence of vetting checks, induction training, and signed Codes of Conduct;
- ensure that recruitment practices reflect both local regulatory requirements and international best practice as set out by British Schools Overseas (BSO) inspection standards and by Keeping Children Safe in Education (KCSIE);
- train all staff involved in recruitment in safer-recruitment principles and refresh this training regularly;

- ensure that the Principal, Governing Board, and recruitment panels are accountable for consistently implementing this policy and complying with KHDA reporting requirements, including the 24-hour notification rule for warnings and dismissals.

ROLES & RESPONSIBILITIES

The responsibility for safer recruitment rests with the entire school, with overall accountability held by the Governing Board and the Principal. Recruitment at the International School of Creative Science (ISCS NAS) is carried out transparently, fairly, and consistently, with safeguarding at the centre of every decision.

GOVERNING BOARD

The Governing Board ensures that the school has a compliant Safer Recruitment Policy and that it reflects KHDA, MoE, BSO, and KCSIE requirements. The Board oversees implementation and holds the Principal accountable for compliance with safer recruitment standards.

PRINCIPAL

The Principal is responsible for the operational delivery of the policy, ensuring that all appointments meet KHDA Teacher Recruitment and Mobility Guidelines (2025) and the KHDA Technical Guide on Staff Deregistration. The Principal ensures all pre-employment checks are complete, that no one begins duties without a KHDA Appointment Notice, and that KHDA is notified within 24 hours of any warnings, dismissals, or relevant resignations.

HUMAN RESOURCES TEAM AND KHDA COMPLIANCE OFFICER

The HR team manages all vetting checks, including identity, qualifications, police clearances, references, and the Single Central Record. They ensure all records are audit-ready for KHDA and BSO inspection, confirm the signing of the KHDA and ISCS Codes of Conduct, and monitor completion of KHDA-mandated induction training. The KHDA Compliance Officer supports HR in managing Appointment Notices, Exit Surveys, and KHDA notifications.

RECRUITMENT MANAGERS

Recruitment Managers, including Heads of Department and Phase Leaders, assist in shortlisting and interviewing using agreed criteria. They raise safeguarding concerns where necessary and collaborate with HR to ensure documentation is complete.

DESIGNATED SAFEGUARDING LEAD (DSL)

The DSL provides safeguarding oversight during recruitment, ensuring safeguarding-related questions are included at interview, reviewing references and disclosures, and advising on any safeguarding risks before appointment.

DIGITAL SAFEGUARDING LEAD

The Digital Safeguarding Lead ensures that candidates' digital conduct aligns with school expectations, including professional use of technology and social media, and flags any concerns identified during online screening or throughout employment.

DATA PROTECTION LEAD

The Data Protection Lead ensures that all recruitment evidence, including identity documents, clearances, references, and signed Codes of Conduct, is collected and stored in accordance with the school's Data Protection Policy, with access restricted to authorised staff.

ALL STAFF INVOLVED IN RECRUITMENT

All staff participating in recruitment must act with integrity, confidentiality, and fairness, complete safer recruitment training where required, and uphold the school's safeguarding and equality standards.

APPLICANTS

Applicants must provide full and accurate information, including disclosure of any criminal convictions or safeguarding concerns. Failure to disclose relevant information may result in withdrawal of an offer, dismissal, or reporting to KHDA or other authorities.

PROCEDURES

Recruitment at the International School of Creative Science (ISCS NAS) follows a transparent process designed to ensure fairness, safeguarding, and compliance with KHDA Teacher Recruitment and Mobility Guidelines (2025), the KHDA Technical Guide on Staff Deregistration, Ministry of Education requirements, BSO standards, and the principles of Keeping Children Safe in Education (KCSIE).

1. Advertising and Vacancy Management

All job advertisements include a safeguarding statement and specify that safer recruitment checks will be carried out. Positions are advertised only after approval by the Principal and HR and must accurately describe the role and required qualifications.

2. Applications

All candidates must submit the school's application form in full, providing a complete employment history and explaining any gaps. CVs alone are not accepted. Applicants are advised that recruitment checks will include identity, criminal record, reference, qualification, and online/social media screening.

3. Shortlisting

Shortlisting is conducted by at least two members of staff against agreed criteria. Any anomalies or safeguarding concerns in employment history are identified and followed up at this stage. The KHDA Deregistration List is checked before interviews are scheduled.

Shortlisted candidates will be asked to complete a self-declaration covering their criminal record and any other information that would make them unsuitable to work with children. This includes whether they are barred or prohibited from working with children in any jurisdiction, and whether they have ever been the subject of a safeguarding investigation. The declaration is signed by the candidate, and anything disclosed is explored with them at interview.

References are sought once a candidate has been selected, and before any offer of employment is confirmed. Given the volume of candidates the school interviews for most posts, obtaining references for every shortlisted applicant in advance of interview is not practicable and would place a disproportionate burden on referees. The school therefore applies the following controls to make sure that concerns are still surfaced early and resolved before anyone is appointed:

- the signed self-declaration is obtained at shortlisting, and anything disclosed is explored with the candidate at interview, so that concerns come to light before selection rather than after it;
- references are requested immediately following selection, are verified directly with the referee rather than accepted at face value, and ask specific questions about the candidate's suitability to work with children;
- open references are not accepted, and at least one reference must come from the candidate's current or most recent employer;
- any concern raised in a reference is explored with the referee and taken up with the candidate before the appointment is confirmed, and the candidate will be invited to a further discussion where that is necessary to resolve it;
- no offer is confirmed, and no candidate begins duties, until all references have been received, scrutinised and any concern resolved.

4. Interviews and Selection

Interviews are conducted by a panel that includes at least one safer-recruitment-trained member. All interviews include questions related to safeguarding and professional values. Where appropriate, candidates may be required to deliver a sample lesson or task to demonstrate competence. Notes are recorded and retained.

5. Pre-employment Checks

Before an appointment is confirmed, the following checks are completed:

- Identity and right-to-work verification
- Attested qualifications and professional registration/licensing where applicable
- Police clearances: UAE (Dubai Police) and, where relevant, home-country and all countries lived in during the last five years, plus any country where the candidate resided for three months or more in the past ten years
- Two professional references, including one from the most recent employer, verified for authenticity and safeguarding comments
- Online and social-media screening
- Confirmation of medical fitness where required
- Check of the KHDA Deregistration List

No staff member may begin duties until all checks are satisfactorily completed and a KHDA Appointment Notice has been issued.

REGULATED ACTIVITY

Regulated activity is the test that determines which roles require the full set of pre-employment vetting checks. It applies to employees, volunteers and contracted individuals alike.

A person is engaged in regulated activity where they are:

- responsible, on a regular basis in a school, for teaching, training, instructing, caring for or supervising children;
- carrying out paid or unpaid work regularly in a school where that work provides an opportunity for contact with children; or
- engaging in intimate or personal care, or in overnight activity, even if this happens only once and regardless of whether they are supervised.

Keeping Children Safe in Education 2026, in line with the Crime and Policing Act 2026, has removed the supervision exemption. Work carried out under supervision is no longer excluded from regulated activity. A role that was previously treated as lower risk because the individual was supervised may now require the full range of checks, and this applies to people already working or volunteering here as well as to new appointments.

The Principal, supported by the Human Resources team and advised by the Designated Safeguarding Lead, will determine whether each role falls within regulated activity before recruitment begins, and will record that determination on the Single Central Record. Where a role falls outside regulated activity, a written risk assessment will be completed and retained as set out in the section on Volunteers below.

The Disclosure and Barring Service and the barred list are United Kingdom mechanisms and are not available to the school for most appointments. Where an enhanced DBS certificate can be obtained it will be sought. In all other cases the school applies the equivalent controls available to us: Dubai Police clearance; police or criminal record certificates from the country of citizenship and from every

country of residence in the relevant period; an ACRO certificate where the individual is a United Kingdom national and one can be obtained; the check against the KHDA Deregistration List; and the UAE visa and labour process.

6. Appointment and Induction

Appointments are confirmed in writing only after all checks are complete and KHDA has issued an Appointment Notice. All new staff must sign both the KHDA and ISCS Codes of Conduct and complete KHDA-mandated induction training on safeguarding, health and safety, and working with Students of Determination before taking on a full teaching load.

7. Record Keeping

All recruitment records, including applications, interview notes, clearances, references, induction certificates, signed Codes of Conduct, and Appointment Notices, are stored securely within personnel files and logged in the school's Single Central Record. Records are retained in compliance with the school's Data Protection Policy and are audit-ready for KHDA, MoE, and BSO inspections.

Recruitment of Overseas Staff and Locally Sourced Staff

The International School of Creative Science (ISCS NAS) recognises that recruitment processes differ for staff recruited from overseas and for those transferring from within the UAE. The same safeguarding standards apply to both pathways, and no staff member may begin duties until all checks are complete and a KHDA Appointment Notice has been issued.

1. Overseas Recruits

Applicants recruited from outside the UAE must:

- provide a valid passport and proof of right to work in the UAE;
- submit attested copies of all relevant academic and professional qualifications, attested by the appropriate UAE Embassy or other authorised body;
- provide police clearance certificates from their country of citizenship and from any country where they have lived for three months or more within the past ten years (or five years if specified by KHDA), including the UAE if previously resident;
- provide two verified professional references, one of which must be from the most recent employer;
- undergo online and social-media screening;
- complete a health and medical fitness declaration in line with UAE visa requirements;
- sign the KHDA and ISCS Codes of Conduct before taking up their post;
- complete KHDA-mandated induction professional development covering safeguarding, health and safety, the KHDA Code of Conduct, and working with Students of Determination before taking on a full teaching load.

A KHDA Appointment Notice will not be activated until all checks, attestations, and visa processes have been satisfactorily completed.

2. Locally Sourced Staff

Applicants already residing in the UAE must:

- provide updated police clearance from Dubai Police (or the relevant emirate) and, if applicable, any other country where they have recently lived for three months or more within the past ten years;
- provide attested qualifications and evidence of professional registration or licensing as required by KHDA or MoE;
- provide two verified professional references, including one from their most recent employer;
- undergo online and social-media screening;
- sign the KHDA and ISCS Codes of Conduct;
- complete KHDA-mandated induction professional development before commencing duties at the new school.

Transfers within the UAE are subject to KHDA's 90-day mobility rule: staff cannot transfer to a new school after 90 days from the start of the academic year unless an exemption is granted by KHDA. In addition, KHDA requires that an Exit Survey is completed by the previous employer before a new Appointment Notice can be issued. The school will also check every applicant against the KHDA Deregistration List prior to making an offer of employment.

3. General Requirements

For both overseas and locally sourced staff, employment offers remain conditional on the completion of all pre-employment checks, the signing of required Codes of Conduct, the successful outcome of KHDA-mandated induction training, and the issuance of a valid KHDA Appointment Notice.

No candidate may begin duties until these requirements have been met.

Trainee and student teachers. Where trainee or student teachers are salaried by the school, the school carries out all the checks required for a new member of staff. Where they are placed by and funded through a training provider, the school obtains written confirmation from that provider that the necessary checks have been completed and that the trainee has been judged suitable to work with children. Trainees are recorded on the Single Central Record for the duration of their placement.

EMPLOYMENT OFFER

All offers of employment made by the International School of Creative Science (ISCS NAS) are conditional and will not be finalised until all safer recruitment checks have been completed to the school's satisfaction.

A conditional offer of employment will be issued in writing following the successful completion of the selection process. The offer will clearly state that it is dependent on:

- satisfactory completion of all pre-employment checks, including identity verification, police clearances from all relevant jurisdictions, attested qualifications, verified references, and online/social media screening;
- confirmation that the applicant is not listed on the KHDA Deregistration List and has no outstanding safeguarding or professional-conduct concerns from previous employment;
- the signing of both the KHDA Code of Conduct and the ISCS Code of Conduct;
- the successful processing and issuance of a valid KHDA Appointment Notice;
- completion of KHDA-mandated induction professional development, including safeguarding and health and safety training.

If any of these conditions are not met, the school reserves the right to withdraw the offer or to terminate the contract. Candidates are reminded that providing false or incomplete information during recruitment is grounds for withdrawing the offer, dismissal, and possible referral to KHDA or other authorities.

Proof of Identity and Right to Work

Before an appointment is confirmed, each candidate must provide:

- a valid passport with at least six months' validity;
- Emirates ID or residence visa, if already resident in the UAE;
- recent passport-sized photographs as required for visa processing;
- attested academic and professional qualification certificates;
- any other documents required by UAE immigration authorities or KHDA.

Identity verification must be completed prior to the issue of a KHDA Appointment Notice. No employee may commence work without their identity and right-to-work status being confirmed.

Personnel File and Records

A full personnel file is maintained for every employee and kept securely by the Human Resources team in accordance with the school's Data Protection Policy. Each file will include, at minimum:

- completed application form and curriculum vitae;
- copies of all identity documents and proof of right to work;
- attested qualification and professional registration certificates;

- police clearance certificates from all relevant jurisdictions;
- two verified professional references;
- signed KHDA Code of Conduct and ISCS Code of Conduct;
- KHDA Appointment Notice and, where applicable, records of any KHDA Exit Survey;
- records of KHDA-mandated induction professional development;
- confirmation of completion of safeguarding and health and safety training;
- notes from interviews and any risk assessments or additional checks undertaken.

Personnel files are held securely and are accessible only to authorised staff. All entries are also logged on the school's Single Central Record (SCR) for auditing purposes. Records are retained in line with KHDA, MoE, and BSO requirements and may be reviewed during inspections or audits.

Single Central Record

The International School of Creative Science (ISCS NAS) maintains a Single Central Record (SCR) as required by KHDA, BSO, and Keeping Children Safe in Education (KCSIE). The SCR provides a single point of reference for all pre-employment vetting checks undertaken for every member of staff, volunteer, and contractor who has direct or regular contact with students.

Following the removal of the supervision exemption in Keeping Children Safe in Education 2026, the population recorded on the Single Central Record has been reviewed and widened to include supervised staff, volunteers and contracted individuals who now fall within regulated activity. The regulated activity determination for each individual is recorded on the SCR.

The SCR is maintained and updated by the Human Resources team and is reviewed regularly by the Principal. It includes, at minimum, the following information for each individual:

- full name and job title;
- date of recruitment and start date;
- confirmation of identity and right-to-work checks;
- details of attested qualifications and professional registrations;
- police clearance certificates from all relevant jurisdictions;
- confirmation of reference checks;
- check against the KHDA Deregistration List;
- confirmation of signing the MOE, KHDA and ISCS Codes of Conduct;
- completion date of KHDA-mandated induction professional development;
- confirmation of level 1 safeguarding training
- notes of any risk assessments or additional vetting undertaken.

The SCR is held securely, is accessible only to authorised staff, and is kept audit-ready for KHDA and BSO inspections. The SCR is reviewed at least once each term to ensure accuracy and compliance.

Audit and Assurance of the Single Central Record

The Single Central Record is subject to three separate lines of assurance. Each is carried out by a different person, each produces a written record, and each is retained as evidence. A review that is not recorded cannot be evidenced at inspection and will be treated as not having taken place.

First line — operational check by Human Resources. Monthly. Carried out by the HR Manager, supported by the KHDA Compliance Officer. The check confirms that every new starter, leaver and change of role since the previous check is correctly reflected; that no field is blank or marked pending; and that no check has expired or is due to expire within the next three months, including police clearances, residence visas and KHDA Teacher Permits. The outcome is recorded as a dated entry in the SCR audit log.

Second line — management check by the Principal or Vice Principal. Termly. This check tests the record against the underlying evidence rather than simply confirming that fields are populated. It covers one hundred per cent of individuals who have joined, left or changed role since the previous audit, together with a sample of at least ten per cent of all entries or twenty records, whichever is the greater, verified against the personnel files. The outcome is recorded on the Single Central Record Audit Record, signed and dated.

Third line — independent check by a governor. At least annually, and termly wherever practicable. Carried out by the BEAM Safeguarding Governor, or by another governor nominated by the Chair of Governors, who must not be the Designated Safeguarding Lead. The governor samples entries against source documents, tests that gaps identified at previous audits have been closed, and confirms that the audit log is being maintained. The outcome is recorded on the Single Central Record Audit Record, signed, reported to the full governing board and minuted.

The third line check provides independent assurance and will not be delegated to the school's leadership team. It is not satisfied by a report to the governing board in place of an inspection of the record itself.

Gaps, actions and closure. Every gap identified at any of the three levels is recorded with a named owner and a deadline for resolution. Where a gap means that an individual is working or volunteering in school without a check that is required for their role, it is escalated to the Principal on the day it is found, the individual's access and duties are reviewed immediately, and the action taken is recorded. Closure of every action is verified at the following audit, and any action still open at that point is reported to the governing board.

Retention and availability. Audit records and the SCR audit log are retained for the current academic year and the two preceding academic years, and are made available at KHDA and BSO inspection. The proforma used for the second and third line checks is the Single Central Record Audit Record, which accompanies this policy.

Purpose of this regime. Together these three lines provide the evidence required by the BSO safeguarding audit that the school has appropriate procedures for the central recording of police checks and recruitment data, that a nominated governor monitors safeguarding arrangements, and that governors check those arrangements are adequate and that any deficiency or weakness is remedied without delay.

Probation Periods

All new staff at ISCS NAS are subject to a probation period as outlined in their contract of employment and in accordance with UAE Labour Law. The probation period allows the school to assess the employee's suitability for the role, including professional competence, conduct, and alignment with the school's ethos and Barakah culture.

During the probation period:

- line managers conduct regular performance reviews and provide feedback to support professional development;
- any safeguarding or professional conduct concerns are investigated promptly;
- where a formal warning or dismissal arises during probation, the school will notify KHDA within 24 hours, as required by KHDA regulations.

Successful completion of probation will be confirmed in writing. If concerns arise, the school may extend the probation period in line with UAE Labour Law or terminate the employment if appropriate. All decisions during probation are documented and retained in the employee's personnel file.

Volunteers

The school welcomes volunteers and values the contribution they make. Volunteers are subject to the same safeguarding standards as employees, applied proportionately to the role they undertake.

Volunteers within regulated activity. A volunteer is engaged in regulated activity, and must therefore receive the same pre-employment vetting as a new member of staff, where they:

- teach, train, instruct, care for or supervise children on more than three days in any thirty-day period;
- are involved in any overnight activity, however infrequently; or
- provide intimate or personal care, however infrequently.

This applies to existing volunteers as well as to new ones. Following the removal of the supervision exemption, the Human Resources team will review all current volunteer arrangements and apply the full checks to any volunteer who now falls within regulated activity.

Volunteers outside regulated activity. Where a volunteer does not meet any of the thresholds above, the school will complete and retain a written risk assessment before the volunteer begins. The risk assessment will consider:

- the nature of the role and the work the volunteer will actually do;
- what is known about the volunteer, including anything disclosed in their self-declaration or raised by a reference;
- whether the volunteer will be supervised at all times, by whom, and how that supervision will work in practice;
- the level and nature of their contact with children, and in particular whether they could at any point be alone with a child;

- whether the volunteer is known to the school and to the school community, and for how long; and
- what checks, if any, are required as a result.

The risk assessment is approved by the Principal, recorded on the Single Central Record, and reviewed at least annually or whenever the volunteer's role changes.

All volunteers. Regardless of whether the role falls within regulated activity, every volunteer will:

- provide their Emirates ID and residence visa, and confirm that their visa and sponsorship permit them to volunteer;
- complete a signed self-declaration covering criminal convictions and any other matter that might make them unsuitable to work with children;
- receive a safeguarding briefing before they start, covering the signs of abuse, the school's reporting route and the identity of the Designated Safeguarding Leads, with the briefing recorded;
- sign the Volunteer Code of Conduct and the confidentiality agreement; and
- be recorded on the Single Central Record.

No volunteer who has not been checked to the standard required for regulated activity will be left unsupervised with a child at any time. The recruitment, induction and day-to-day management of volunteers is set out in full in the Volunteer Policy.

Adults Who Supervise Children on Work Experience

Where the school arranges work experience or external placements for pupils, the adults who supervise them in the host organisation are not employed by the school. The school nonetheless remains responsible for satisfying itself that the placement is safe before a pupil begins.

Before a placement starts, the school will:

- establish who in the host organisation will supervise the pupil, and whether that supervision amounts to regulated activity;
- obtain written confirmation from the host organisation that the individuals concerned have been appropriately checked under the law of the jurisdiction in which the placement takes place;
- carry out a risk assessment of the placement covering the working environment, the hours, transport arrangements, and whether the pupil could at any point be alone with an adult;
- brief the pupil on how to raise a concern, and give them a named contact at school and a direct means of reaching that person; and
- record the placement, the confirmations obtained and the risk assessment.

Where the school cannot satisfy itself that the arrangements are safe, the placement will not proceed.

Duty to Refer and Report

Where an individual is dismissed, or resigns or otherwise ceases to provide their services in circumstances where they would have been dismissed, because they have harmed a child or pose a

risk of harm to children, the school has a duty to report the matter. The individual will not simply be allowed to leave.

In those circumstances the school will:

- notify the KHDA within twenty-four hours, in accordance with KHDA reporting requirements and the Technical Guide on Staff Deregistration;
- ensure the individual is recorded on the KHDA Deregistration List where the criteria are met;
- refer the matter to Dubai Police where a criminal offence may have been committed;
- where the individual is supplied by an employment agency, a contractor or another third party, notify that organisation and share the relevant information with them; and
- where the individual holds a professional registration, or is a national of a country that operates its own barring or prohibition arrangements, consider whether a referral to that body is appropriate.

A settlement or compromise agreement will never be used to avoid a referral or report that would otherwise be required. The full procedure for managing allegations against staff is set out in Appendix 3 of the Child Protection and Safeguarding Policy.

EXTERNAL PROVIDERS AND CONTRACTORS

All adults working on site or in direct contact with students, including bus drivers, bus attendants, catering staff, cleaners, maintenance teams, and security personnel employed by external contractors, must meet the same safeguarding and vetting standards as school employees.

Following the removal of the supervision exemption in Keeping Children Safe in Education 2026, contracted staff who work under supervision now fall within regulated activity. The Operations Department, in consultation with the Designated Safeguarding Lead, will identify which contracted roles fall within regulated activity, record that determination, and ensure the checks applied match it.

The Operations Department will ensure that all external providers:

- have formal agreements requiring compliance with KHDA, MoE, and UAE safeguarding and recruitment regulations;
- provide written confirmation that their staff have completed identity, right-to-work, police clearances from all relevant jurisdictions, and medical fitness checks;
- supply copies of key vetting records for audit by the school;
- maintain updated staff lists and immediately notify the school of personnel changes.
- confirm, for each individual, whether their role falls within regulated activity, and provide evidence of the checks appropriate to that determination;
- where the individual is self-employed and contracts directly with the school — for example a peripatetic music tutor, a sports coach, an external therapist or an after-school activity provider — provide those checks themselves, since there is no employing organisation to provide them. The school will apply the same standard to such individuals as it applies to volunteers, including a written risk assessment where the role falls outside regulated activity; acknowledge in writing that where an allegation is made against one of their staff, the school

and the contractor share responsibility for the safeguarding response: the school will gather the facts and manage the safeguarding process, while the contractor will usually lead any disciplinary action.

The Operations team will keep a central register of all contracted staff and ensure records are available for inspection by KHDA or other regulators. The school reserves the right to deny access or request removal of any contracted staff who do not meet these standards.

No contracted individual will be left unsupervised with a child unless the checks appropriate to regulated activity have been completed and the Principal has approved it in writing.

REVIEW AND MONITORING

The International School of Creative Science (ISCS NAS) is committed to keeping this Safer Recruitment Policy up to date with changes in law, regulatory guidance, and best practice in safeguarding.

This policy will be:

- formally reviewed at least once every academic year by the Principal in consultation with the Human Resources team, the Designated Safeguarding Lead, the Digital Safeguarding Lead, and the Governing Board;
- reviewed whenever KHDA, the Ministry of Education, British Schools Overseas (BSO), or Keeping Children Safe in Education (KCSIE) issue updated requirements or guidance relevant to recruitment or safeguarding;
- adjusted in response to recommendations from KHDA inspections, BSO inspections, or internal safeguarding audits;
- updated whenever significant changes occur in UAE Labour Law or other relevant legislation.

The school will ensure that all staff involved in recruitment are made aware of any changes to the policy and receive additional training as required.

The latest approved version of this policy will be made available on ISCS Central and on the school's official website for reference by all staff and stakeholders.

Regular monitoring of the application of this policy will include spot checks of the Single Central Record, periodic audits of personnel files, and an annual compliance review led by the Principal and reported to the Governing Board.

The audit regime for the Single Central Record specifically, including the independent governor check, is set out in full under Audit and Assurance of the Single Central Record above. The Principal reports the outcome of each audit cycle to the governing board, together with any action still outstanding.



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