Safer Recruitment Commitment

Approved by: Raúl Fernández Pascual, Principal, Colegio CEDES	**Last reviewed on:** July 2026
Next review due by: July 2027	

1. Purpose

The purpose of this Commitment is to set our Group's minimum expectations for safer recruitment across its schools and Head Office. It is intended to deter unsuitable applicants, identify and reject applicants who are unsuitable to work with children, and support a consistent culture of safeguarding throughout recruitment, appointment, induction and ongoing employment.

This Commitment summarises the overarching requirements. Detailed operational steps, forms, checklists and local procedures should be set out in the relevant Safer Recruitment Policy and local HR guidance.

2. Scope

This Commitment applies to recruitment and appointment processes for all adults who may work with, supervise, support or otherwise have contact with children through Group schools, including:

employees, whether permanent, fixed-term, full-time, part-time or temporary;

senior leaders, teaching staff, support staff, administrative staff and Head Office staff where relevant;

supply, agency and third-party staff;

trainee or student teachers, including salaried and fee-funded routes;

contractors, self-employed contractors, consultants, coaches and peripatetic staff;

volunteers, including regular, occasional and overnight volunteers;

Board members, governors, proprietors, trustees or equivalent local governance figures;

host families, homestay adults and adults supervising work experience or school-arranged activities.

Each school must ensure this Commitment is applied alongside host country law, local regulator requirements, international safer recruitment expectations and the school's own safeguarding arrangements.

3. Legislation and Guidance

This Commitment is informed by the following key sources and should be read in conjunction with the most current versions of each document:

- **Keeping Children Safe in Education 2026**, particularly Part Three: Safer Recruitment;
- **Working Together to Safeguard Children 2026**;
- **Organic Law 8/2021, of 4 June, on the Comprehensive Protection of Children and Adolescents against Violence (LOPIVI)**, particularly Article 57, concerning the requirements for access to and exercise of professions, occupations and activities involving regular contact with children;
- **Royal Decree 1110/2015, of 11 December, regulating the Central Register of Sexual Offenders and Human Trafficking**, as amended by **Royal Decree 407/2024, of 23 April**;
- **Organic Law 1/1996, of 15 January, on the Legal Protection of Minors**, as amended;
- **Organic Law 2/2006, of 3 May, on Education (LOE)**, as amended by **Organic Law 3/2020, of 29 December (LOMLOE)**;

- **Royal Legislative Decree 2/2015, of 23 October, approving the revised text of the Workers' Statute**, in relation to applicable employment and recruitment requirements;
- **Law 31/1995, of 8 November, on Occupational Risk Prevention**, where applicable to pre-employment fitness and occupational health requirements;
- **Organic Law 4/2000, of 11 January, on the Rights and Freedoms of Foreign Nationals in Spain and their Social Integration**, together with its implementing regulations, in relation to immigration, residence and right-to-work requirements;
- **Organic Law 3/2018, of 5 December, on Personal Data Protection and Guarantee of Digital Rights (LOPDGDD)**, together with **Regulation (EU) 2016/679 (General Data Protection Regulation – GDPR)**, particularly in relation to the collection, verification, storage and retention of recruitment and safeguarding information;
- applicable **Spanish legislation governing criminal-record checks, professional qualifications, recognition of overseas qualifications and suitability to work with children**;
- applicable **education, safeguarding, child protection and employment legislation and regulations of Castilla-La Mancha**;
- **International Task Force on Child Protection (ITFCP)** expectations and recommended safer recruitment practices;
- the relevant **Group Child Protection and Safeguarding Policy**;
- the **Group Safer Recruitment Policy** and recruitment practice guidance;
- relevant school policies and procedures relating to **safeguarding, recruitment and staff management, whistleblowing, staff conduct, allegations against staff, low-level concerns and data protection**.

For schools outside England, including Colegio CEDES in Spain, KCSIE is used as an international benchmark of good safeguarding practice. It does not replace Spanish national or regional statutory obligations, which must be applied in full. Where Group requirements and local statutory requirements differ, the higher safeguarding standard should be applied insofar as it is compatible with Spanish law.

4. Roles and Responsibilities

Role	Responsibility
Principal / Head of School	Ensures recruitment is planned, appropriately resourced and compliant; confirms responsible recruiting managers; ensures no appointment is confirmed before required checks have been completed, verified and recorded.
Recruiting Managers	Apply safer recruitment procedures consistently, shortlist against role criteria, explore gaps or concerns, test safeguarding understanding at interview and record decisions.
Local HR / School HR	Maintains recruitment records, mandatory check evidence and the Single Central Record; verifies documents; escalates anomalies or missing evidence.
Designated Safeguarding Lead	Advises on safeguarding-related recruitment risk, induction content, ongoing vigilance and concerns arising during or after appointment.
Regional Head of Schools / Group Safeguarding Lead	Supports oversight, challenge and assurance, particularly where concerns, exceptions or risk assessments are required.
Group HR	Supports group consistency, policy oversight, recruitment standards and escalation of employment or safer recruitment concerns.
Board/Governors	The Board/governing body must ensure effective safer recruitment arrangements are in place and that the school complies with statutory safeguarding and pre-employment

Role	Responsibility
	checking requirements. They must also provide oversight and assurance that recruitment practices are robust, compliant, and place children's welfare at the centre of appointment decisions.

5. Safer Recruitment Principles

The Group is committed to safeguarding and promoting the welfare of children. Safer recruitment is a whole-organisation responsibility and must never be treated as an administrative exercise only.

Safeguarding must be explicit at every stage of recruitment, from advertising through to induction and probation.

Where possible, at least two people should be involved in shortlisting and interviewing.

Recruiters must be appropriately trained in safer recruitment and must understand the relevant safeguarding expectations for the role.

Recruitment decisions must be evidence-based, recorded and capable of later scrutiny.

Any gaps, inconsistencies, unexplained moves, short-term employment patterns or safeguarding concerns must be explored before appointment.

No person should start work unsupervised in regulated activity, or equivalent local child-facing activity, until required checks are complete or formally risk assessed and mitigated.

Local checks must be supplemented by international checks where a candidate has lived or worked outside the current country of appointment.

6. Recruitment and Selection Requirements

6.1 Advertising

All advertisements and recruitment information must make clear the school’s commitment to safeguarding and promoting the welfare of children, the safeguarding responsibilities of the role, and the checks that will be undertaken for shortlisted and successful candidates.

Suggested wording:
Colegio CEDES is committed to safeguarding and promoting the welfare of children and young people. Rigorous checks are conducted during the recruitment process. All appointments are subject to satisfactory references, identity, qualification, right-to-work, criminal-record and other safeguarding checks appropriate to the role, the country of appointment and any country in which the candidate has lived or worked.

6.2 Applications and Shortlisting

- Candidates must complete the relevant school or company application form before interview or appointment.
- Application forms must require a full employment history and explain that **candidates must meet all legal safeguarding and suitability requirements applicable in Spain for roles involving regular contact with children.**
- Shortlisting must consider gaps in employment, repeated short-term employment, unexplained changes in role or location, inconsistencies and any information that may indicate suitability concerns.
- Shortlisted candidates should complete a self-declaration of criminal record or other information that may make them unsuitable to work with children, **insofar as permitted by applicable Spanish law.**
- Schools may conduct online searches on shortlisted candidates as part of due diligence where permitted by law. Candidates must be informed that such checks may be undertaken.

6.3 Interview and Selection

- Interviews should be face-to-face wherever possible, including by video where appropriate.
- Interviewers must probe any gaps, inconsistencies, anomalies or safeguarding-related concerns identified during shortlisting.
- All interviews must include at least one safeguarding question and must assess the candidate's understanding of professional boundaries and child protection responsibilities.
- All information considered and appointment decisions must be recorded.

7. Pre-Appointment Checks and Single Central Record

All offers of appointment are conditional until satisfactory completion, verification and recording of required pre-appointment checks. The specific checks will depend on the legal jurisdiction, the role, whether the person engages in regulated activity or equivalent child-facing work, and whether the person has lived or worked overseas. **In Spain, these checks must be carried out in accordance with applicable Spanish safeguarding, employment, immigration, criminal-record and data protection legislation.**

7.1 Core Pre-Appointment Checks

- identity check, with original documentation checked where practicable;
- right-to-work or visa eligibility confirmation for the relevant country;
- professional qualifications and teacher status or equivalent checks where required;
- satisfactory references, normally including the current or most recent employer and direct line manager;
- criminal-record, barred-list, DBS, ICPC, police certificate or equivalent checks appropriate to the role and jurisdiction. **In Spain, for roles involving regular contact with children, this includes the required negative certificate from the Central Register of Sexual Offenders and Human Trafficking (**Registro Central de Delincuentes Sexuales y de Trata de Seres Humanos**), in accordance with Article 57 of Organic Law 8/2021 (LOPIVI). DBS and barred-list checks apply only where relevant to the candidate's UK history or circumstances;**
- prohibition, sanction, restriction or teacher-record checks where relevant and legally available;
- further checks for candidates who have lived or worked outside the country of appointment;
- medical fitness or fit-to-work declaration where required by local law or role requirements.

7.2 References

- Open references or testimonials provided by the candidate must not be accepted as substitutes for direct references.
- References should be obtained directly from referees and verified where appropriate.
- Referees should be asked directly about suitability to work with children, safeguarding or disciplinary concerns, reasons for leaving and whether the referee would re-employ the candidate, **insofar as such information may lawfully be requested and processed under applicable Spanish law.**
- Any concern, ambiguity or adverse information must be escalated to the **Principal, Regional Head of Schools, Group HR and/or Group Safeguarding Lead**, as appropriate, before appointment is confirmed.

7.3 Overseas and International Checks

Where a candidate has lived or worked outside the country of appointment, the school must make further checks it considers appropriate so that relevant events outside the country can be considered. These may include overseas criminal record checks, police certificates, certificates of good conduct, ICPC where relevant, and confirmation from professional or regulatory authorities that no sanctions, restrictions or concerns have been imposed.

For appointments in Spain, overseas checks must be considered alongside any additional certificates or information required under Spanish law, particularly where the candidate has lived or worked outside Spain or holds a nationality for which additional criminal-record information is required.

Where such information is unavailable or incomplete, the school must document the steps taken and complete a written risk assessment before deciding whether to proceed.

7.4 Single Central Record

Each school must maintain an accurate Single Central Record, or local equivalent, in a form that can be scrutinised by internal reviewers, external regulators and inspectors. As a minimum, it should record the date and outcome of required checks, the name or initials of the person completing or verifying each check, and any written confirmation received from agencies or third-party providers.

- identity and right-to-work checks;
- criminal-record, DBS, ICPC, police certificate, barred-list or equivalent checks, **including, in Spain, the required check against the Central Register of Sexual Offenders and Human Trafficking where applicable;**
- prohibition, sanction, restriction or teacher-record checks, where relevant and legally available;
- qualification checks;
- overseas checks and accompanying risk assessments where applicable;
- references and date verified;
- safeguarding and safer recruitment training records where relevant;
- volunteer, governor, contractor and agency confirmations where relevant.

All recruitment records and personal data collected as part of these checks must be processed, stored and retained in accordance with applicable Spanish data protection legislation, including Organic Law 3/2018 (LOPDGDD) and Regulation (EU) 2016/679 (GDPR).

8. Volunteers, Contractors, Agency Staff and Other Adults

8.1 Volunteers

Schools must distinguish between volunteers who are in regulated activity, or equivalent local child-facing activity and volunteers who are not. KCSIE 2026 removes the previous supervision exemption from regulated activity for relevant school and college volunteering. Therefore, regular or overnight volunteering which involves teaching, training, instructing, caring for or supervising children must be treated as regulated activity for English benchmark purposes. **For schools in Spain, the equivalent safeguarding requirements and checks must be determined in accordance with applicable Spanish law, including the requirements applicable to activities involving regular contact with children under Article 57 of Organic Law 8/2021 (LOPIVI).**

- No unchecked volunteer may be left unsupervised or allowed to work in regulated activity or equivalent local child-facing activity.
- Regular or overnight volunteers in relevant child-facing roles should have an enhanced DBS check with children's barred-list information, **or, in Spain, the equivalent safeguarding checks required under Spanish law, including a negative certificate from the Central Register of Sexual Offenders and Human Trafficking (**Registro Central de Delincuentes Sexuales y de Trata de Seres Humanos**) where applicable.**
- Existing volunteers whose role now falls within regulated activity from 1 September 2026 must have their barred-list status checked **or, for schools in Spain, have the equivalent local safeguarding checks reviewed in accordance with applicable Spanish law.**
- For volunteers not in regulated activity, schools must complete a written risk assessment and record what checks, supervision and restrictions are appropriate.

8.2 Agency and Third-Party Staff

- The school must obtain written confirmation from the agency or third party that required checks have been carried out.
- The confirmation must specify whether criminal-record, barred-list, safeguarding and identity checks, **or the equivalent checks required under applicable Spanish law**, were completed and whether any certificate or information disclosed concerns.

- Where disclosed information or concerns exist, the school must obtain sufficient information to make its own suitability decision before the person begins work.
- The school must verify that the person presenting for work is the same person on whom the checks were completed.

8.3 Contractors and Self-Employed Workers

- Safeguarding requirements must be set out in contracts with external providers.
- Contractors in regulated activity or equivalent child-facing work require the appropriate enhanced or local safeguarding checks, **in accordance with applicable Spanish law.**
- Contractors with regular opportunity for contact with children but not regulated activity should be risk assessed and checked at the appropriate level.
- No contractor without appropriate checks may work unsupervised or engage in regulated activity or equivalent child-facing duties.
- Self-employed individuals must either be checked by the school or provide evidence of an appropriate check that the school verifies and records.

8.4 Trainee and Student Teachers

- Where trainees are salaried by the school, the school must complete all necessary pre-appointment checks.
- Where trainees are fee-funded through a provider, the school must obtain written confirmation that the provider has completed required checks and judged the trainee suitable to work with children.
- Schools may record fee-funded trainees on the Single Central Record or local equivalent as non-statutory information where this supports assurance.

8.5 Visitors, Work Experience and Homestay

- Visitor management arrangements must be set out in the relevant safeguarding policy, including ID checks, supervision expectations and assessment of educational value and age appropriateness.
- Adults supervising children on work experience must be assessed according to the frequency, nature and supervision of the activity.
- Where a school arranges homestay or host-family accommodation, required safeguarding checks and local assurances must be obtained and recorded.
- Where overseas criminality information is not available for host families abroad, the school must liaise with partner schools or organisations to establish clear shared safeguarding arrangements and inform parents of the agreed arrangements.

9. Ongoing Vigilance and Recording

Safer recruitment does not end once appointment checks are complete. Schools must maintain a culture of vigilance, professional curiosity and safe reporting. Leaders should ensure that staff understand how to raise low-level concerns, allegations, whistleblowing concerns and safeguarding concerns about adults working with children.

- New staff must receive safeguarding induction, including the child protection policy, staff code of conduct, local reporting procedures, whistleblowing arrangements and the relevant parts of KCSIE **as an international benchmark of good safeguarding practice, together with applicable Spanish safeguarding and child protection requirements.**
- Managers must monitor conduct, professional boundaries and integration during induction and probation, especially during the early period of employment.
- New checks must be considered where there are concerns about an existing staff member's or volunteer's suitability, where a person moves into regulated activity or equivalent child-facing duties, where there has been a break in service of 12 weeks or more, or where **applicable Spanish law, Group policy or safeguarding guidance** requires renewed checks.
- Where a person is dismissed, removed or would have been removed because they harmed, or posed a risk of harm to, a child, the school must consider and make any required referral to the **relevant Spanish statutory, judicial,**

law-enforcement, safeguarding or professional authority, as applicable, and to the relevant Group safeguarding structures in accordance with Group procedures.

10. Monitoring and Review

This Commitment will be **reviewed annually**, or sooner where statutory guidance, **applicable Spanish national or regional law**, regulatory standards or Group requirements change. Compliance will be monitored through Group and local school review, **Group HR review**, safeguarding audits, Single Central Record checks and escalation of recruitment exceptions.

Schools must retain evidence of local adaptation, approval, implementation and staff communication. Any material deviation from this Commitment must be documented, risk assessed and approved by the Principal, Regional Head of Schools, Group HR and/or the Group Safeguarding Lead as appropriate.

11. Related Policies

Child Protection and Safeguarding Policy

Safer Recruitment Policy

Staff Code of Conduct

Allegations Against Staff Policy

Low-Level Concerns Procedure

Whistleblowing Policy

Data Protection and Records Retention Policy

Recruitment Practice Guidance for Schools

Single Central Record Checklist

Volunteer, Contractor and Visitor Procedures

Appendix A: School Adaptation Checklist

Area	School to confirm	Complete
Document control	Insert local document ID, approver, approval date, effective date and review date.	☐
Local law	Confirm host-country criminal-record, employment, immigration and data protection requirements.	☐
Safeguarding contacts	DSL: Verónica Carrión López.	☐
Recruitment forms	Check application form, self-declaration, reference request and interview record align with this Commitment.	☐
Advertising wording	Insert school name and local safeguarding statement in all advertisements.	☐
Checks matrix	Confirm role-by-role checks for staff, volunteers, contractors, agency staff, Board members and host families.	☐
SCR/local record	Confirm all required columns, dates, checker details and evidence storage arrangements.	☐
Training	Confirm safer recruitment training requirements for all recruiters and record completion.	☐
Induction	Confirm safeguarding induction content and KCSIE or local-equivalent reading requirements.	☐
Approval	Record local approval and publish or circulate the final version.	☐

Appendix B: 2026 Update Summary

The following updates have been reflected in this 2026 version:

updated reference from KCSIE 2025 to KCSIE 2026, with implementation from 1 September 2026;

clearer treatment of volunteers in regulated activity and removal of the supervision exemption for relevant volunteering roles;

additional wording on existing volunteers whose role falls within regulated activity from September 2026;

updated references to checking teacher records and professional restrictions;

stronger requirements on agency, third-party, contractor, self-employed and visitor assurance;

expanded treatment of trainee and student teachers;

greater emphasis on ongoing vigilance beyond appointment checks;

clearer expectation for written risk assessment where checks are unavailable, incomplete or role-specific judgement is required;

template-aligned document control, review arrangements, related policies and school adaptation checklist.