# Safer Recruitment Commitment 2026

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| **Approved by:** | Michael Clack and Andy Edgar | **Last reviewed on:** | September 2026 |
| **Date:** | September 2026 | **Next review due by:** | September 2027 |

*This policy applies to Baleares International College at both sites, Sa Porrassa and Sant Agustí.*

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## 1. Purpose

The purpose of this Commitment is to set out Baleares International College's commitment to safer recruitment, in line with the Ariston Education Group's minimum expectations. 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 and checklists are set out in the school's Safer Recruitment Policy.

## 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 Baleares International College, including:

- employees, whether permanent, fixed-term, full-time, part-time or temporary;
- senior leaders, teaching staff, support staff, administrative staff;
- 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;
- representatives of the proprietor (Ariston Education);

The school applies this Commitment alongside Spanish law, the requirements of the Conselleria d'Educació i Universitats, international safer recruitment expectations and its 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;
- Spanish law, in particular Ley Orgánica 8/2021 (LOPIVI), Article 57, and Ley Orgánica 1/1996, Article 13.5 (the certificado negativo del Registro Central de Delincuentes Sexuales y de Trata de Seres Humanos), the Estatuto de los Trabajadores, Ley Orgánica 4/2000 on the rights of foreign nationals (right to work), and Regulation (EU) 2016/679 (GDPR) with Ley Orgánica 3/2018 (LOPDGDD);
- International Task Force on Child Protection expectations and recommended recruitment practices;
- the relevant Group Child Protection and Safeguarding Policy;
- the Group Safer Recruitment Policy and recruitment practice guidance;
- the school's safeguarding, HR, whistleblowing, code of conduct and privacy policies.

**As the school is outside England, KCSIE is used as a benchmark of good practice. It does not replace Spanish statutory obligations, which are applied in full.**

## 4. Roles and Responsibilities

At Baleares International College: Principals: Alison Colwell (Sa Porrassa) and Andrew Beavon (Sant Agustí). DSLs: Stuart Cadman and Fiona Von Waberer (Sa Porrassa), Mel Eccleshall (Sant Agustí). Deputy DSLs: Lesley

Dixon (Sa Porrassa) and Jacqui Robinson (Sant Agustí). School HR: Myriam Boussoumah. Regional Head of Schools: Jonathan Dey.

| Role | Responsibility |
|---|---|
| **Principal** | 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. |
| **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** | 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. |
| **Ariston Education (proprietor)** | Ariston Education (proprietor) seeks assurance that effective safer recruitment arrangements are in place and that the school complies with statutory safeguarding and pre-employment 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

Baleares International College 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 other habitual contact with children, until required checks are complete or formally risk assessed and mitigated. A risk assessment can never replace the Spanish certificado negativo, which must be received before any habitual contact with children begins, supervised or not.
- Spanish 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.

The school uses the following wording:

*Baleares International College 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 checks (including the Spanish certificado negativo de delitos de naturaleza sexual) 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 school's application form before interview or appointment.
- Application forms must require a full employment history and explain that it is an offence to apply for a role involving regulated activity, or other habitual contact with children, if barred from doing so.
- 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.
- Application forms include a section in which candidates may voluntarily disclose any known offences relevant to working with children. Shortlisted candidates must provide the certificado negativo, together with any equivalent overseas certificate.
- The school 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 other habitual contact with children, and whether the person has lived or worked overseas.

### 7.1 Core pre-appointment checks

- identity check, with original documentation checked where practicable;
- right-to-work or visa eligibility confirmation for Spain;

- 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 checks: the Spanish certificado negativo, and overseas police certificates (for the UK, the ACRO ICPC) appropriate to the person's history;
- In Spain, these include: the certificado negativo del Registro Central de Delincuentes Sexuales y de Trata de Seres Humanos, required by Ley Orgánica 8/2021 (LOPIVI), Article 57, and Ley Orgánica 1/1996, Article 13.5, for every adult whose work, paid or unpaid, involves habitual contact with children; no one may start such work without it;
- for non-Spanish nationals, a criminal record certificate from their country of nationality and from any country of previous residence, translated and apostilled or legalised where required;
- for staff recruited from the United Kingdom, for candidates who have lived in the UK, an ACRO ICPC (or a DBS check only where one can lawfully be obtained), and a Teaching Regulation Agency prohibition check for teachers (with a section 128 check for leadership roles);
- right to work in Spain, including the NIE or TIE and registration with the Social Security system (afiliación), and, for non-EU nationals, the required work authorisation under Ley Orgánica 4/2000 and its regulations;
- prohibition, sanction, restriction or teacher-record checks where relevant;
- further checks for candidates who have lived or worked outside the country of appointment;
- health surveillance through the external prevention service (Arxiduc) under Article 22 of Ley 31/1995, with only the fitness conclusion passed to the school.

### 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.
- Any concern, ambiguity or adverse information must be escalated to the Principal, School HR, 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.

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

The school must maintain an accurate Single Central Record (SCR), 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 checks: the Spanish certificado negativo, and overseas police certificates (for the UK, the ACRO ICPC) appropriate to the person's history;
- prohibition, sanction, restriction or teacher-record checks;
- qualification checks;
- overseas checks and accompanying risk assessments where applicable;
- references and date verified;
- safeguarding and safer recruitment training records where relevant;
- volunteer, proprietor, contractor and agency confirmations where relevant.

## 8. Volunteers, Contractors, Agency Staff and Other Adults

### 8.1 Volunteers

The school must distinguish between volunteers who are in regulated activity, or other habitual contact with children 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.

- No unchecked volunteer may be left unsupervised or allowed to work in regulated activity or other habitual contact with children.
- In Spain, the certificado negativo del Registro Central de Delincuentes Sexuales y de Trata de Seres Humanos is required for any volunteer whose activity involves habitual contact with children, whether or not they are supervised.
- Regular or overnight volunteers in child-facing roles must provide the Spanish certificado negativo and, where they have lived in the UK, an ICPC or basic DBS certificate, and the Spanish certificado negativo, with any international checks available.
- Existing volunteers whose role now falls within regulated activity from 1 September 2026 must hold a current Spanish certificado negativo and have any available overseas checks reviewed.
- For volunteers not in regulated activity, the school 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 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 habitual contact with children must provide the Spanish certificado negativo, and any overseas checks appropriate to their history.
- 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 other habitual contact with children.
- 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.
- The school may record fee-funded trainees on the Single Central Record 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.

## 9. Ongoing Vigilance and Recording

Safer recruitment does not end once appointment checks are complete. The school 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 Part 1.
- 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 other habitual contact with children, where the person is re-employed after a break in service (a return after a break is treated as a new appointment, with all pre-appointment checks repeated; this does not apply to maternity, paternity or other statutory leave), or where law or guidance requires renewed checks.

- Staff and volunteers in habitual contact with children renew their certificado negativo every two years, and the renewal date is recorded on the single central record.
- 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 statutory, regulatory, barred-list or professional body.

## 10. Monitoring and Review

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

The school retains evidence of approval, implementation and staff communication. Any material deviation from this Commitment must be documented, risk assessed and approved by the Principal and a DSL, with School HR, and notified to the Regional Head of Schools; escalated to Group HR or the Group Safeguarding Lead where required.

## 11. Related Policies

- Child Protection and Safeguarding Policy
- Safer Recruitment Policy
- Staff Code of Conduct
- Allegations Against Staff Policy
- Recruitment Practice Guidance for Schools
- Single Central Record Checklist
- Volunteer, Contractor and Visitor Procedures

## 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;