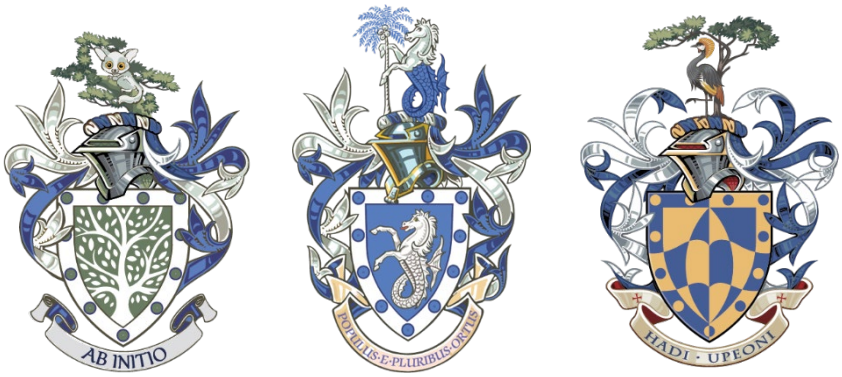

PEPONI SCHOOLS

Safer Recruitment Policy

To be reviewed by:	Headmaster, Peponi School Head, Peponi House Head of Peponi House Kabete Kindergarten
Date of Policy:	September 2026
Review Frequency:	Annually
Review Date:	September 2027

1 Introduction

The Peponi Schools (the School) is committed to maintaining an open and transparent safeguarding culture in which safer recruitment is recognised as a key component of protecting children from harm.

The aims of the School's recruitment policy are as follows:

i. to ensure that the best possible staff are recruited on the basis of their merits, abilities and suitability for the position;

ii. to ensure compliance with all relevant legislation, regulations, recommendations and guidance including the Kenya Children Act 2022, the Basic Education Act 2013 (as amended), the Data Protection Act 2019, Teacher Service Commission (TSC) requirements and Codes of Conduct, Kenya Association of International Schools (KAIS) guidance, Keeping Children Safe in Education 2026 (England) as adopted by the School as a recognised international safeguarding standard, relevant Disclosure and Barring Service (DBS) guidance, and other safeguarding and safer recruitment guidance applicable to the School from time to time, and

iii. to ensure that the School meets its commitment to safeguarding and promoting the welfare of children and young people by carrying out all necessary pre-employment checks.

Employees involved in the recruitment and selection of staff are responsible for familiarising themselves with and complying with the provisions of this policy.

2 Recruitment and selection - general principles

We will:

i. ensure that directors and employees who undertake recruitment receive regular safer recruitment training;

ii. ensure that all job descriptions and person specifications specify the safeguarding responsibilities of the posts;

iii. ensure that safeguarding responsibilities are explicit in the job description of the Designated Safeguarding Lead and any deputies (further guidance can be found in KCSIE 2026);

iv. ensure that all advertisements, applicant information, School policies and our website reflect the fact that we take our responsibilities for child safeguarding very seriously;

v. ensure that every appointment panel includes at least one member who has received safer recruitment training;

vi. implement robust recruitment procedures and checks for appointing employees and volunteers to ensure that all reasonable steps are taken to avoid appointing anyone who is unsuitable to work with children, is disqualified from working with children or does not have suitable skills and experience for their intended role;

vii. maintain a single central record of recruitment and vetting checks in line with the Kenyan Ministry of Education, KAIS, TSC and the DfE requirements;

viii. ensure that the terms of engagement for any contract with a contractor or agency require them to adopt and implement the same standards as are described in this policy, which we will monitor; and

ix. require employees who are convicted or cautioned for any offence during their employment with the School to notify the Head in writing of the offence and the penalty without delay.

x. If a member of staff involved in the recruitment process has a close personal or familial relationship with an applicant they must declare it to the HR department and avoid any involvement in the recruitment and selection decision making process.

2.1 Job descriptions and person specifications

All job descriptions will set out the role's safeguarding responsibilities and will be prepared using the School's standard templates. The precise range of responsibilities will differ but every post will include responsibility for ensuring the safety and security of children and young people. A person specification is required for every job role and will specify, if appropriate, the qualifications and/or level of experience required for that role.

2.2 Advertising and applicant information

The School will advertise all vacant posts initially within Kenya and then where appropriate internationally to ensure equality of opportunity and encourage as wide a field of candidates as possible. Wherever the advertisement is placed, it will include information about the School's commitment to safeguarding and promoting the welfare of children and the requirement for suitability checks. The applicant information will also include a copy of our Safeguarding and Child Protection Policy and a statement of the School's commitment to child safeguarding.

3 Recruitment and selection procedure

All applicants for employment will be required to complete the School's standard application form containing questions about their academic and employment history and their suitability for the role. Applicants will also be asked to provide details of their online profile, including account names and social media handles so that online searches can be carried out on shortlisted candidates (see section 5 for more information). This information must be provided by the applicant in order for the application to be accepted.

A curriculum vitae will not be accepted in place of the completed application form. However, in the case of support staff a CV will be accepted until support can be provided to the applicant to complete the application form.

The School will then conduct a shortlisting exercise by reviewing all application forms received in order to determine which applicants will be invited for interview.

Shortlisted applicants will then be invited to attend a formal interview at which their relevant skills and experience will be discussed in more detail. All shortlisted applicants will be tested at interview about their suitability to work with children.

All shortlisted applicants will be required to complete a self-declaration form prior to interview in which they will be asked to provide information about their criminal records history and other factors relevant to their suitability to work with children. This information will be considered and discussed with applicants at interview.

If the School decides to make an offer of employment following the formal interview, any such offer will be conditional on the following:

i. the agreement of a mutually acceptable start date and the signing of a contract incorporating the School's standard terms and conditions of employment

ii. verification of the applicant's identity (where that has not previously been verified)

iii. verification of qualifications, whether professional or otherwise, which the School takes into account in making the appointment decision, or which are referred to in the application form, whether a requirement for the role or not

iv. verification of the applicant's employment history

v. the School being satisfied that any information generated through online searches does not make the applicant unsuitable to work at the School

vi. the receipt of two references (one of which must be from the applicant's most recent employer) which the School considers to be satisfactory

vii. for positions which involve candidates from the UK where there is "teaching work", information about whether the applicant has ever been referred to, or is the subject of a sanction, restriction or prohibition issued by the Teaching Regulation Agency which renders them unable or unsuitable to work at the School

viii. for applicants who have carried out teaching work outside the UK, information about whether the applicant has ever been referred to, or is the subject of a sanction issued by a regulator of the teaching profession in any other country which renders them unable or unsuitable to work at the School

ix. where the position amounts to "regulated activity (see section 4.4.2 below) the receipt of an International Child Protection Certificate or a Kenyan Certificate of Good Conduct which the School considers to be satisfactory

x. where the position amounts to "regulated activity" (see section 4.4.2 below) confirmation that any applicant from the UK is not named on the Children's Barred List (referencing current and previous surnames)

xi. information about whether any applicant from the UK has ever been subject to a direction under section 142 of the Education Act 2002 which renders them unable or unsuitable to work at the School

xii. for management positions, information about whether any applicant from the UK has ever been referred to the Department for Education, or is the subject of a direction under section 128 of the Education and Skills Act 2008 which renders them unable or unsuitable to work at the School

xiii. verification of the applicant's medical fitness for the role (see section 4.9 below)

xiv. verification of the applicant's right to work

xv. any further checks which the School decides are necessary as a result of the applicant having lived or worked outside of Kenya which may include an overseas criminal records check, certificate of good conduct or professional references.

4 Pre-employment checks

In accordance with the recommendations set out in KCSIE, DUCA and the requirements of the National minimum standards for boarding schools (September 2022), the School carries out a number of pre-employment checks in respect of all prospective staff.

4.1 Online searches

In addition to the checks set out below, the School reserves the right to obtain such formal or informal background information about an applicant as is reasonable in the circumstances to determine whether they are suitable to work at the School. In accordance with KCSIE this will include online searches on shortlisted candidates (online searches). The School uses a third-party provider to conduct online searches of social media platforms on its behalf. The School's own searches may include searches of internet search engines and websites.

Applicants are asked in the application form to provide details of any websites they are involved with, in or featured on or named on and any other publicly available online information about them of which the School should be made aware.

Shortlisted candidates will also be asked to provide details of their online profile, including account names and social media handles directly to the third party provider. This information will be used to carry out online searches as part of the School's due diligence checks. Applicants are not required to provide account passwords or to grant the School access to private social media accounts.

Online searches may be carried out at the shortlisting stage or after an offer of employment has been made (but prior to work commencing). The School will not carry out online searches as part of its initial sift of applications.

The School will determine how it approaches online searches on a case by case basis. However, all applicants for a role at the School will be treated consistently with regard to online searches.

Wherever possible, the School's own online searches will be undertaken by a person who will play no other part in the recruitment process (including the shortlisting exercise) or the appointment decision. In carrying out online searches the School is looking for any publicly available information about an applicant that:

i. may be relevant to their suitability to carry out the role for which they have applied;
ii. may be relevant to their suitability to work at the School or in an education setting;
iii. is of a safeguarding nature; and / or
iv. may have an impact on the School's reputation (whether positive or negative)

Any information generated from online searches will be entered in an 'Online search results record'. Where online searches are undertaken on shortlisted applicants any relevant information generated will be provided to the interview panel for discussion with shortlisted applicants at interview. Where online searches are undertaken on the successful applicant only any relevant information generated will be discussed prior to employment commencing. All offers of employment will be conditional upon the School being satisfied that the successful applicant is suitable to work at the School in light of any information generated from online searches.

In evaluating any online information for relevance the School will use the following criteria:

i. whether the information is relevant to the position applied for;
ii. whether the information is relevant to the applicant's suitability to work at the School or in an education setting;
iii. whether the information could have an impact on the School's reputation (whether positive or negative);
iv. whether the information calls into doubt the applicant's willingness or ability to uphold the School's commitment to safeguarding and promoting the welfare of children;
v. the length of time since the information became publicly available and whether the applicant's circumstances have changed since the information was published;
vi. whether the information reveals a pattern of concerning behaviour; and
vii. the relevant circumstances and the explanation(s) offered by the applicant.

For successful candidates, the School will retain information generated through online searches for the duration of the individual's employment and in accordance with its Information and Records Retention Policy after employment ends.

For unsuccessful candidates, the School retains the information generated from online searches for three months from the date on which they are informed their application was unsuccessful, after which it will be securely destroyed.

4.2 Verification of identity, address, right to work and qualifications

All applicants who are invited to an interview will be required to bring with them evidence of their identity, right to work, address and qualifications.

The School asks for this information at the interview to ensure that the person attending the interview is who they claim to be, that they are permitted to work for the School if appointed and that they hold appropriate qualifications.

Identity and address: all applicants must bring with them to interview, original documents which evidence their identity.

Right to work: all applicants residing in Kenya must also bring to the interview a valid form of evidence which confirms their right to work in Kenya. Overseas applicants who are successful will be supported by the School to obtain their work permit and right to work.

Qualifications: all applicants must also bring to the interview original documents which evidence any educational and professional qualifications referred to in their application form and / or which the School requests.

Proof of identity and other documentation will be verified by an appropriately trained employee, as designated by the Head. Candidates will be expected to produce original documents, e.g. birth certificates, qualification certificates and other documentation.

If the original documents cannot be produced, we will require a properly certified copy.

4.3 References

All offers of employment will be subject to the receipt of a minimum of two references which are considered satisfactory by the School. One of the references must be from the applicant's current or most recent employer. Where the candidate has previously worked with children and the current / most recent employment does / did not involve work with children, then the second reference should be from the employer with whom the applicant most recently worked with children. Neither referee should be a relative or someone known to the applicant solely as a friend.

All referees will be asked whether they believe the applicant is suitable for the job for which they have applied and whether they have any reason to believe that the applicant is unsuitable to work with children. All referees will be sent a copy of the job description and person specification for the role for which the applicant has applied. If the referee is a current or previous employer, they will also be asked to confirm the following:

i. the applicant's dates of employment, salary, job title / duties, reason for leaving, performance, attendance and disciplinary record

ii. whether the applicant has ever been the subject of disciplinary procedures involving issues related to the safety and welfare of children (including any in which the disciplinary sanction has expired), except where the issues were deemed to have resulted from allegations which were found to be unsubstantiated, unfounded, false or malicious

iii. whether any allegations or concerns have been raised about the applicant that relate to the safety and welfare of children or young people or behaviour towards children or young people, except where the allegation or concerns were found to be unsubstantiated, unfounded, false or malicious

iv. whether the applicant could be considered to be involved in "extremism" (see the definition of "extremism" at section 7 below).

The School will only accept references obtained directly from the referee and it will not rely on references or testimonials provided by the applicant or on open references or testimonials.

The School will compare all references with any information given on the application form. Any discrepancies or inconsistencies in the information will be taken up with the applicant and the relevant referee before any appointment is confirmed.

If it has not been possible to obtain a reference prior to interview it will be reviewed upon receipt. Any discrepancies identified between the reference and the application form and/or the interview assessment form will be considered by the School. The applicant may be asked to provide further information or clarification before an appointment can be confirmed.

If factual references are received i.e. those which contain limited information such as job title and dates of employment, this will not necessarily disadvantage an applicant although additional references may be sought before an appointment can be confirmed.

The School may at its discretion make contact with any referee to verify the details of the written reference provided.

The School treats all references given or received as confidential which means that the applicant will not usually be provided with a copy.

For internal applicants for new posts, a review of their personnel file will be conducted and documented by the chair of the selection panel and a member of the HR department, to ensure that any information held by the School in relation to the bullet points above is identified. Where appropriate, a risk assessment will be conducted to ensure that any risks identified from the review are considered. As part of the risk assessment, senior staff may be consulted by the chair of the selection panel to determine whether any issues affect the candidate's suitability.

4.3.1 Regulated activity

The School requires an International Child Protection Certificate or Kenyan Certificate of Good Conduct in respect of all positions at the School which amount to "regulated activity" as defined in the Safeguarding Vulnerable Groups Act 2006 (as amended). Any position undertaken at, or on behalf of the School will amount to "regulated activity" if it:

i. is carried out frequently, meaning once a week or more; or
ii. is carried out overnight, meaning between 2.00 a.m. and 6.00 a.m.; or
iii. satisfies the "period condition", meaning four times or more in a 30 day period; and
iv. provides the opportunity for contact with children.

School will assess all volunteer and unpaid roles against the current statutory definition of regulated activity. Supervision alone will not automatically remove a role from regulated activity status. Where a role constitutes regulated activity, all required safeguarding checks, including barred-list information where applicable, will be completed before duties commence

It is for the School to decide whether a role amounts to "regulated activity" taking into account all the relevant circumstances. However, nearly all posts at the School amount to regulated activity. Limited exceptions could include an administrative post undertaken on a temporary basis in the School office outside of term time or voluntary posts which are supervised.

4.3.2 Starting work pending receipt of the ICPC or Kenyan CID check

If there is a delay in receiving the appropriate check, the Head has discretion to allow an individual to begin work pending receipt of the certificate. This will only be allowed if all other checks, have been completed and once appropriate supervision has been put in place. A pending risk assessment must be completed and regularly reviewed until the certificate is seen.

A full risk assessment will be undertaken by a senior member of staff designated by the Head, who will document their decision.

4.3.3 Applicants with periods of overseas residence

For applicants who are living overseas, the applicant will be required to provide additional information about their suitability from the country (or countries) in which they have lived. The School's policy is to request such information from each overseas country in which the applicant has lived for a period of three months or more in the previous five years.

When requesting such information the School has regard to relevant government guidance and will therefore always require the applicant to apply for a formal check from the country in question i.e. a criminal records check (or equivalent) or a certificate of good conduct.

The School recognises that formal checks are not available from some countries, that they can be significantly delayed or that a response may not be provided. In such circumstances, the School will seek to obtain further information from the country in question, such as a reference from any employment undertaken in that country.

Sanctions and restrictions issued by the regulating authority of another country will not prevent a person from working as a teacher at the School. However, the School will take all relevant information into account in determining whether an applicant is suitable to work at the School.

The School may allow an applicant to commence work pending receipt of a formal check from a particular country if it has received a reference and/or letter of professional standing from that country and considers the applicant suitable to start work. Decisions on suitability will be based on all of the information that has been obtained during the recruitment process. Unless expressly waived by the School, continued employment will remain conditional upon the School being provided with the outcome of the formal check and it being considered satisfactory.

If no information is available from a particular country the School may allow an applicant to commence work if they are considered suitable based on all of the information that has been obtained during the recruitment process.

The School will take proportionate risk based decisions on a person's suitability in these circumstances. All suitability assessments must be documented and retained on file.

If the formal check is delayed and the School is not satisfied about the applicant's suitability in the absence of that information, the applicant's proposed start date may be delayed until the formal check is received.

4.4 Prohibition from teaching check

The School is required to check whether staff coming from the UK who carry out "teaching work" are prohibited from doing so. The School uses COBIS to support them to check whether successful applicants are the subject of a prohibition, or prohibition order issued by a professional conduct panel on behalf of the Teaching Regulation Agency.

4.5 Prohibition from management check

The School is required to check whether any UK applicant for a management position is subject to a direction under section 128 of the Education and Skills Act 2008 which prohibits, disqualifies or restricts them from being involved in the management of an independent school (a section 128 direction).

The School will carry out checks for section 128 directions when appointing applicants into management positions from both outside the School and by internal promotion.

4.6 Childcare Disqualification

All applicants to whom an offer of employment is made to carry out a relevant role in Early Years provision will be required to complete a self-declaration form confirming whether they meet any of the criteria for disqualification under the Regulations.

4.7 Medical fitness

The School is required to verify the medical fitness of anyone to be appointed to a post at the School, after an offer of employment has been made but before the appointment can be confirmed.

Successful applicants will be required to sign a declaration of medical fitness confirming that there are no reasons, on grounds of mental or physical health, why they should not be able to discharge the responsibilities required by the role.

5 Contractors and agency staff

The School must complete the same checks for contractors and their employees undertaking regulated activity at the School as it does for its own employees. The School requires written confirmation from the contractor that it has completed these checks and the date on which they were completed on all of those individuals whom it intends will work at the School before any such individual can commence work at the School.

Agencies who supply staff to the School must also complete the pre-employment checks which the School would otherwise complete for its staff. Again, the School requires confirmation that these checks have been completed and the date on which the checks were completed before an individual can commence work at the School.

The School will independently verify the identity of individuals supplied by contractors or an agency in accordance with section 3.2 above and requires the provision of the ICPC or Kenyan CID certificate before those individuals can commence work at the School. If the certificate reveals a positive disclosure, the School will require the contractor or agency to provide a copy of their risk assessment in relation to the positive disclosure and/or the School will complete its own, following the procedure set out in section 7.2 below. Staff will also check the date of the certificate and, where the certificate has been issued over three months prior to the date of checking, the School will request confirmation from the contractor/agency that the individual has been working in a school in the previous three months.

6 Volunteers

6.1 General Principles

The School welcomes volunteers and recognises the valuable contribution they make to the education and welfare of pupils. The School is committed to ensuring that all volunteers are recruited and managed in a manner that safeguards and promotes the welfare of children.

All volunteers will be subject to an assessment of their role, responsibilities, level of contact with pupils, frequency of attendance and degree of supervision. Appropriate safeguarding checks will be undertaken before a volunteer commences work within the School.

6.2 Assessment of Volunteer Roles

Prior to appointment, the School will determine whether a volunteer role constitutes regulated activity in accordance with current legislation and statutory guidance.

The School will not assume that supervision alone removes a volunteer role from regulated activity. Each role will be assessed individually against the statutory definition of regulated activity and the nature of the work undertaken with children.

The Headteacher, Designated Safeguarding Lead (DSL), HR Manager or other designated senior leader will determine the level of checks required.

6.3 Recruitment and Vetting Checks

Depending upon the nature of the role, the School may require:

proof of identity;

- verification of address;
- references where appropriate;
- Kenyan Police Clearance Certificate

overseas criminal record information and/or certificates of good conduct where appropriate;

a written risk assessment where a volunteer commences duties before all checks are completed.

No volunteer will be permitted to undertake regulated activity if they are barred from working with children.

6.4 Risk Assessment

Where a volunteer is not undertaking regulated activity, the School will undertake a written risk assessment to determine:

- the level of supervision required;
- the nature and frequency of contact with pupils;
- the setting in which activities will occur;
- whether a Kenyan Police Clearance check is appropriate;
- any additional safeguarding measures required.

The assessment will be proportionate to the risks associated with the role and will be reviewed where duties change.

6.5 Supervision

All volunteers will receive appropriate supervision by a member of staff.

The level of supervision will reflect:

- the volunteer's role;
- their experience;
- the age and needs of the children involved;
- the outcome of any safeguarding risk assessment.

Volunteers will not be permitted to work in a manner that is inconsistent with the safeguarding measures identified by the School.

6.6 Safeguarding Induction and Conduct

Before commencing duties, volunteers will receive safeguarding information through training and documentation appropriate to their role, including:

- the School's Child Protection and Safeguarding Policy;
- the Staff Code of Conduct;
- the identity of the DSL and Deputy DSLs;
- procedures for reporting safeguarding concerns;

- whistleblowing procedures;

expectations regarding professional boundaries and acceptable conduct.

Volunteers are required to report immediately any safeguarding concern, allegation, disclosure, unsafe practice or concern regarding the behaviour of a member of staff, volunteer or visitor.

6.7 Record Keeping

The School will maintain appropriate records of all safeguarding checks undertaken in relation to volunteers.

Where volunteers undertake regulated activity, the relevant checks will be recorded on the Single Central Record. The School may also record the checks and risk assessments undertaken in relation to other volunteers where it considers this appropriate.

6.8 Visitors Acting as Volunteers

Individuals who volunteer on a one-off or occasional basis, such as assisting at school events, accompanying trips or supporting enrichment activities, will be assessed on a case-by-case basis.

The School will determine the level of supervision and safeguarding checks required, taking account of the frequency of contact with pupils, the nature of the activities and any potential safeguarding risks.

7 Visitors and Visiting Speakers Procedures and the Prevent Duty

The Prevent Duty Guidance requires the School to have clear protocols for ensuring that any visiting speakers, whether invited by staff or by pupils, are suitable and appropriately supervised.

All visiting speakers will be subject to the School's Visitors and Visiting Speakers Procedures. This will include signing in and out at Reception, the wearing of a visitors badge at all times and being escorted by a fully vetted member of staff between appointments.

The School will also obtain such formal or informal background information about a visiting speaker as is reasonable in the circumstances to decide whether to invite and/or permit a speaker to attend the School. In doing so the School will always have regard to these Visitors and Visiting Speakers Procedures, the Prevent Duty Guidance and the definition of "extremism" set out in KCSIE which states:

""Extremism" is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas. Terrorist groups very often draw on extremist ideas developed by extremist organisations."

8 Single Central Record (SCR)

The School will maintain a Single Central Record (SCR) of recruitment and vetting checks i in accordance with KCSIE 2026 and applicable safeguarding requirements. The record will include details of all employees and other individuals providing services to the School such as casual staff, agency workers (whether paid directly or through an agency), directors and those who provide additional teaching or instruction for pupils but are not directly employed e.g. sports coaches, artists, language tutors, individual music teachers etc.

In accordance with KCSIE 2026, the SCR will indicate whether the following checks have been carried out or certificates obtained, and the date on which each check was completed or certificate obtained:

i. an identity check;
ii. an ICPC or Kenyan CID certificate provided;

iii. a prohibition from teaching check for staff coming from the UK;
iv. further checks on people who have lived or worked outside Kenya;
v. a check of professional qualifications, where required;
vi. a check to establish the person's right to work; and
vii. details of the section 128 checks undertaken for those in management positions moving from the UK.