2026/2027

Safer Recruitment Policy

WHOLE SCHOOL

MORNA INTERNATIONAL COLLEGE

IBIZA

SINCE 1973

Policy Owner:

Head Teacher

1. Purpose

Morna International College is committed to recruiting and retaining staff who are suitably qualified, competent, professional and committed to safeguarding and promoting the welfare of children. Safer recruitment is an essential part of safeguarding and is intended to prevent unsuitable individuals from gaining access to children through employment, volunteering, agency work or other regular school activity.

This policy sets out the School's approach to recruitment, selection, pre-employment checks, vetting, appointment, induction and ongoing suitability. Recruitment decisions must be fair, transparent, accountable and consistent with the School's safeguarding responsibilities, applicable Spanish requirements and the standards adopted by the School.

2. Scope

This policy applies to appointments and placements made through the School's educational recruitment process, including teaching staff, learning support staff, senior leaders, volunteers, agency or temporary staff, sports coaches and visiting professionals who may have regular contact with students.

Staff employed through Morna Technical Services, including office staff and contractors, are employed or engaged through the Executive Director and are outside the School's educational recruitment process and the Head Teacher's Central Vetting Register. The safer recruitment arrangements applicable to those employees, contractors and other engagements are administered separately by the Executive Director, who is responsible for applying an appropriate safer recruitment process and for compiling and maintaining the Morna Technical Services Central Vetting Register. Where staff employed through Morna Technical Services or contractors have access to students, the Executive Director must ensure that the safeguarding checks and any supervision arrangements required for that access are completed and recorded before unsupervised access is permitted.

3. Recruitment Principles

Recruitment decisions will be based upon safeguarding children; merit and suitability for the role; qualifications and experience; professional competence; integrity; equality of opportunity; and compliance with applicable employment legislation.

The School is committed to promoting diversity and does not unlawfully discriminate on the grounds of race, nationality, ethnic origin, religion or belief, disability, age, sex, sexual orientation, gender identity, family status or any other protected characteristic recognised under applicable legislation.

4. Recruitment Process

All vacancies will follow a structured recruitment process appropriate to the role. This will normally include a job description and person specification; appropriate advertising; application information; shortlisting against published criteria; interview or other selection activity; verification of identity and employment history; references; qualification and professional-status checks; safeguarding and criminal-record checks; and a formal offer subject to satisfactory vetting and final approval.

No person may begin unsupervised work with students until all safeguarding checks required for the role have been completed satisfactorily and recorded. This includes the Spanish Sexual Offences and Human Trafficking Register certificate (Registro Central de Delincuentes Sexuales y Trata de Seres Humanos), referred to thereafter in this policy as the Spanish sexual offences certificate, where the role involves habitual contact with minors, in accordance with applicable Spanish legislation. The certificate must be requested as part of the pre-employment checking process and a satisfactory result must be received, verified and recorded before the individual begins work or activity involving habitual contact with minors. Any exceptional start before completion of a non-safeguarding administrative check must be expressly authorised, documented and risk assessed, with defined supervision and a completion deadline. An outstanding safeguarding clearance must not be treated as a routine administrative exception.

5. Job Descriptions and Advertising

Job descriptions will clearly describe duties and responsibilities, safeguarding responsibilities, required qualifications, experience, and essential and desirable criteria.

Advertisements will include an appropriate safeguarding statement confirming that Morna International College is committed to safeguarding and promoting the welfare of children and that all appointments are subject to satisfactory safer recruitment checks.

6. Selection Procedures

Shortlisting will be undertaken by a recruitment panel appropriate to the role. Normally, more than one person will participate in shortlisting and interview, and at least one panel member must have received appropriate safer-recruitment guidance or training. Panel members must declare any actual or potential conflict of interest and must not participate where that conflict could compromise a fair process.

Selection methods may include structured interviews, teaching observations, presentations, practical tasks, written exercises and leadership activities. Interview questions will explore professional competence, suitability for working with children, safeguarding awareness, motivation, previous employment history and professional conduct. Unexplained gaps, discrepancies, frequent changes of employment or inconsistencies between the application and references will be explored and recorded

before appointment.

Online checks

As part of due diligence for shortlisted candidates, the School may carry out a proportionate online safeguarding search using publicly available information where this is considered relevant to the role or to information arising during shortlisting. The decision to undertake a search, its scope and the reason for it must be safeguarding-focused, consistent and documented by the recruitment panel. Searches must be limited to publicly available information relevant to suitability to work with children. Any information that may affect an appointment must be verified and discussed fairly with the candidate before a decision is made.

7. References

The School will obtain at least two professional references before confirming employment. One should normally be from the applicant's current or most recent employer and, for applicants who have worked in education, should include an appropriate school or education employer where

available. References must be obtained directly from the referee using independently verified professional contact details rather than relying solely on details supplied by the applicant.

References should confirm dates and role, professional conduct and suitability, and include appropriate safeguarding questions. Open references or testimonials supplied by an applicant will not normally be accepted as a substitute for direct references. Where authenticity is uncertain, or information is incomplete or inconsistent, the School will verify the reference through an independently obtained school or business email address and/or telephone contact and record the clarification before appointment.

8. Pre-employment Checks

Employment or placement is conditional upon satisfactory completion of the checks required for the role, as identified in Appendix 1 (Role-Based Pre-Employment Checklist). These include identity; right to work where required; employment history; references; qualifications and professional registration required for the post; recognition or homologation where required for the role in Spain; the Spanish sexual offences certificate; overseas police or criminal-record evidence where applicable; and prohibition or professional-status checks where the post requires them. The Head Teacher will use Appendix 1 to record whether each check is required, completed or not applicable, the basis for any item marked not applicable, and completion on the School's Central Vetting Register. Safeguarding checks required for unsupervised access must be satisfactorily completed before that access is permitted.

Verification standards

Original or otherwise reliably authenticated evidence must be checked against the individual. Copies or verification records must identify what was seen, by whom and when. Qualification and professional-status evidence must be checked with the issuing body or an appropriate official source where authenticity, recognition or status is material to the role. Overseas police or criminal-record evidence must meet the requirements set out in section 9. The Spanish sexual offences certificate must be verified and recorded in accordance with section 4 and Appendix 1.

9. Overseas Recruitment

All newly appointed staff recruited from overseas must provide, before an appointment is confirmed, appropriate police or criminal-record evidence from their current country of residence and, where relevant to their residence or employment history, from other countries in which they have lived or worked. For applicants recruited from the United Kingdom, the School normally requires an ACRO Police Certificate or other appropriate police or criminal-record evidence. For applicants recruited from other jurisdictions, the recognised national equivalent from the relevant police or competent authority must be provided. International qualifications and professional registration will be verified where relevant, together with immigration or visa evidence and recognition or homologation of qualifications in Spain where required. The Spanish sexual offences certificate remains a separate safeguarding requirement for appointments involving habitual contact with minors, in accordance with applicable Spanish legislation, and must be satisfactorily completed before such work or activity begins.

10. Agency Staff and Volunteers

Before agency staff who may have contact with students are given access, the School must obtain written assurance from the supplying organisation identifying the individual and confirming the checks completed for that role. The School will verify identity on arrival and retain the required

documentary confirmation, or record its verified location or reference, on the Central Vetting Register. Any discrepancy must be resolved before unsupervised access is permitted.

Volunteers will be assessed according to their duties, frequency of attendance and level of supervised or unsupervised access to students. Required checks and any supervision arrangements must be documented before work begins. Volunteers must receive safeguarding information relevant to their role and understand the School's reporting procedures.

11. Central Vetting Register

The School maintains a secure Central Vetting Register for recruitment and suitability checks completed for staff and other adults within the scope of this policy. The register will record, as applicable, identity, right to work, qualifications and professional status, references, criminal-record evidence, the Spanish sexual offences certificate, overseas checks, safeguarding clearance, agency assurance, the date each check was completed, and any recorded risk-assessed exception or supervision arrangement. The Executive Director maintains a separate Morna Technical Services Central Vetting Register for staff employed through Morna Technical Services, including office staff and contractors.

The Head Teacher is responsible for maintaining the School's Central Vetting Register and supporting evidence for appointments within the scope of this policy. Access is restricted to authorised staff. The Head Teacher will ensure that the register is formally reviewed at least annually and monitored throughout the year, with omissions, expired documents, discrepancies and overdue actions followed up promptly. The audit process will record the date, reviewer and actions required. The Executive Director is separately responsible for the Morna Technical Services Central Vetting Register and equivalent audit arrangements for staff employed through Morna Technical Services, including office staff and contractors.

Rechecks, Changes and Breaks in Service

The Head Teacher will review whether further checks are required when a person changes name, changes role materially, returns after a break in service, is re-engaged, or when a time-limited document expires. Any required recheck must be completed and recorded before unsupervised duties continue where the outstanding matter affects safeguarding clearance, identity, right to work or professional suitability.

12. Induction

All new employees within the scope of this policy will receive a structured induction appropriate to their role. As part of the induction process, new employees will undertake a full review of the Staff Handbook and receive appropriate training and guidance on iSAMS, safeguarding, child protection procedures, the Staff Code of Conduct, the Workplace Harassment Policy, the Behaviour Management Policy, health and safety, the E-Safety and Device Policy, reporting procedures, and other key school policies and procedures relevant to their role. Employees are expected to understand and comply with these requirements as a condition of their ongoing professional responsibilities.

13. Probation and Ongoing Suitability

Safeguarding responsibilities continue beyond appointment. During probation and throughout employment, the School will monitor professional conduct, provide supervision where appropriate, support professional development, investigate safeguarding concerns promptly and address conduct inconsistent with the Staff Code of Conduct. The School will identify and monitor checks

or documents requiring renewal, review or re-verification through its Central Vetting Register and associated review arrangements.

14. Confidentiality and Data Protection

Recruitment and vetting information will be processed, retained and disposed of in accordance with Regulation (EU) 2016/679 (General Data Protection Regulation - GDPR), Spanish Organic Law 3/2018 of 5 December on the Protection of Personal Data and Guarantee of Digital Rights (LOPDGDD), and the School's applicable data-retention arrangements. Access to recruitment documentation and criminal-record information will be restricted to authorised personnel and limited to what is necessary for recruitment, safeguarding and legal compliance. Records relating to unsuccessful applicants will be retained only for the applicable retention period and then securely disposed of.

Information relating to safeguarding, police and criminal-record checks will be handled confidentially while ensuring that safeguarding responsibilities are fulfilled. Recruitment decisions and supporting evidence will be recorded sufficiently to demonstrate a fair and accountable process. Name changes, breaks in service, re-engagement and expiring documents for staff within the scope of this policy must be notified to the Head Teacher so that the need for re-verification or further checks can be determined and recorded.

15. Roles and Responsibilities

The Executive Director is responsible for final employment approval, contractual and employing-company requirements, and for the safer recruitment process and separate Morna Technical Services Central Vetting Register for staff employed through Morna Technical Services, including office staff and contractors. The Head Teacher is responsible for the educational and safeguarding integrity of recruitment within the scope of this policy, including ensuring that required suitability checks are completed before appointments are confirmed and that safeguarding concerns are escalated appropriately.

The Head Teacher is responsible for coordinating recruitment documentation for appointments within the scope of this policy, verifying evidence, obtaining and checking references, maintaining recruitment files and the School's Central Vetting Register, monitoring outstanding or expiring documentation, and escalating discrepancies. Senior and middle leaders involved in the recruitment process are responsible for accurate job information, fair shortlisting and selection, safeguarding-focused questioning, conflict declarations, induction and ongoing monitoring of suitability. Staff involved in recruitment must receive appropriate safer-recruitment guidance or training relevant to their responsibilities.

Applicants are responsible for providing accurate, complete and honest information and requested evidence promptly, including information necessary to explain employment gaps, name changes and relevant overseas history. Failure to disclose relevant information or provision of false or misleading information may result in withdrawal of an offer or action under applicable employment procedures.

16. Supporting Operational Documents

This policy is supported by Appendix 1 (Role-Based Pre-Employment Checklist) and Appendix 2 (Central Vetting Registers and Audit Procedure). Appendix 1 sets out the checks to be considered and recorded for each appointment within the scope of this policy. Appendix 2 sets out the arrangements for the School's Central Vetting Register and the separate Morna Technical Services

Central Vetting Register maintained by the Executive Director.Appendix 1 - Role-Based Pre-Employment Checklist

The checklist below sets the minimum categories that must be considered for each appointment within the scope of this policy. The Head Teacher must record whether each item is required, completed, not applicable, or requires escalation. The precise legal document required may vary according to the individual's history, employing arrangement and role.

Appendix 1 – Role-Based Pre-Employment Checklist

Check	Teachers / leaders	LSAs / learning support	Volunteers / coaches	Agency staff
Identity	Required	Required	Required	Verify + agency assurance
Right to work / immigration	Required	Required	Where legally or operationally applicable to the individual's role or status	Agency assurance; School verifies where necessary
Employment history / gaps	Required	Required	According to duties, access and safeguarding risk	Agency assurance
Professional references	At least two	At least two	According to duties, access and safeguarding risk	Agency assurance
Qualifications / professional status	Required for role	Required for role	Required for role	Agency assurance + verify role requirement
Spanish sexual offences certificate	Required for appointments involving habitual contact with minors; satisfactory result received, verified and recorded before such work or activity begins	Required for appointments involving habitual contact with minors; satisfactory result received, verified and recorded before such work or activity begins	Required where the role or activity involves habitual contact with minors, in accordance with applicable Spanish legislation; otherwise according to duties and level of contact	Written agency assurance of required checks
Overseas police / criminal-record check	If recruited from overseas: appropriate police or criminal-record evidence from the current country of residence and, where relevant, other countries in the individual's residence or employment history; ACRO Police Certificate or other appropriate evidence for UK applicants	If recruited from overseas: appropriate police or criminal-record evidence from the current country of residence and, where relevant, other countries in the individual's residence or employment history; ACRO Police Certificate or other appropriate evidence for UK applicants	If required by residence history or role	Agency assurance; additional evidence if concerns or gaps arise
Online safeguarding search	Shortlisted candidates where relevant to the role or information arising during shortlisting	Where relevant to the role or information arising during shortlisting	Where proportionate to duties and level of access	Agency assurance; School search where relevant
Central Vetting Register entry	Required	Required	Required where in scope	Required assurance entry
Safeguarding induction	Required	Required	Required for role	Required / School briefing

Appendix 2 - Central Vetting Registers and Audit Procedure

Morna International College and Morna Technical Services maintain two separate Central Vetting Registers. The Head Teacher will maintain the Morna International College Central Vetting Register as the School's authoritative record of completed recruitment and suitability checks for appointments within the scope of this policy. The Executive Director will maintain the Morna Technical Services Central Vetting Register as the authoritative record for staff employed through Morna Technical Services, including office staff and contractors. Supporting evidence for both registers will be stored securely in accordance with access and retention requirements.

Each register entry will identify the individual, role or relationship with the School or company, employing or supplying organisation where relevant, each required check, the date completed, outcome/status, evidence location, reviewer where appropriate, and any expiry, follow-up or risk-assessed supervision arrangement.

The current Morna International College Safeguarding Database forms the School's Central Vetting Register and records the following elements for each person, as applicable:

- Name.
- Recruited from (resident in).
- Relevant qualifications.
- Starting date.
- Identification check: document, date checked and checked by.
- Reference (with safeguarding check): source, date received and received/checked by.
- DBS or equivalent criminal-record evidence: document, date checked and checked by.

These database fields form part of the Morna International College Central Vetting Register and should be maintained alongside any additional role-specific checks, outcomes, evidence locations, expiry dates, follow-up actions or risk-assessed supervision arrangements required by this policy. The Morna Technical Services Central Vetting Register must record equivalent evidence appropriate to the roles and safeguarding access of employees of that company.

Each Central Vetting Register will be formally reviewed at least annually by its responsible owner or a formally delegated senior reviewer: the Head Teacher for Morna International College and the Executive Director for Morna Technical Services. Each review will sample completeness and accuracy, identify missing or expiring evidence, record actions and owners, and confirm closure of previous actions.

No omission on either Central Vetting Register should be treated as evidence that a check is unnecessary. Where applicability is uncertain, the responsible owner must resolve or escalate the matter before unsupervised access is authorised.

Policy Information

Policy Title	Safer Recruitment Policy
Policy Owner	Head Teacher
Responsible Officer	Executive Director
Applies To	Staff involved in educational recruitment; applicants; volunteers; agency staff; sports coaches and visiting professionals within the scope of this policy
Approved By	Executive Director
Date Approved	August 2026
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