Safer Recruitment Policy

XCL Education Malaysia

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XCL Education Malaysia Safer Recruitment Policy

Keeping Every Child Safe
Memelihara Keselamatan Kanak-Kanak

Last Update: August 2025

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1. Our Commitment

1.1 At XCL Education Malaysia, safeguarding begins with recruitment. We are committed to hiring only those suitable to work with children and to maintaining the highest standards in safer recruitment, aligned to Malaysian law, Keeping Children Safe in Education (KCSIE 2025), COBIS, and the BISSC Code of Conduct.

"It is vital that the approach to safeguarding create a culture that safeguards and promotes the welfare of children. As part of this culture, it is important that they adopt robust recruitment procedures that deter and prevent people who are unsuitable to work with children from applying for or securing employment, or volunteering opportunities in schools and colleges."
– Keeping Children Safe in Education, UK Department for Education, 2025

1.2 This policy outlines our approach through four principles: Deter, Prevent, Reject, Observe, and includes processes for compliance, oversight, and continuous improvement.

1.3 Our approach reflects both Malaysian legal requirements and international best practice, including the standards set out in Keeping Children Safe in Education (KCSIE, UK, 2025), COBIS standards, and our obligations under Malaysian legislation such as the Child Act 2001 and the Sexual Offences Against Children Act 2017.

1.4 Key safeguarding terms and ideas are referenced in Appendix 1. We recognise that some terminology may be complex or unfamiliar, so this glossary has been provided to support clarity and consistency of understanding across our schools.

2. Policy Principles

2.1 We embed safer recruitment practices that are proactive, rigorous, and continuously upheld throughout employment:

Deter unsuitable individuals by fostering a visible safeguarding culture, clear expectations in job materials, and unambiguous language in all recruitment communications.

Prevent unsuitable appointments through structured processes, thorough vetting, and transparent decision-making.

Reject any applicants where verified concerns, safeguarding risks, or unexplained gaps in employment history raise doubts about their suitability.

Observe all adults regularly post-appointment through probation checks, safeguarding induction, and ongoing vigilance to ensure they continue to meet our high standards.

2.2 These apply to all adults on campus, including staff, contractors, coaches, volunteers, interns, and vendors.

2.3 Recruitment is not complete when an offer is made. Observation and induction are vital parts of safer recruitment.

3. Safer Recruitment Training

3.1 All HR Business Partners, Hiring Managers, and staff involved in recruitment must complete safer recruitment / safeguarding training every two years. This ensures a consistent understanding of current legal, regulatory, and safeguarding expectations.

3.2 A short e-learning module is available on TEAMS and must be completed by all relevant staff prior to participating in any recruitment activity.

3.3 Ongoing training is delivered to HR Business Partners and hiring managers through a regular safeguarding forum. This form focuses on risk indicators, process and procedure, interview questions, documentation standards, and emerging safeguarding concerns, and recommends amendments to our policy when the need arises.

3.4 Staff responsible for managing the Single Central Record (SCR) must complete annual training tailored to their role, covering audit requirements, documentation, and compliance checks.

3.5 All safer recruitment training is recorded, monitored, and reviewed by HR and the Designated Safeguarding Lead at school level to ensure compliance and identify areas for improvement, and overseen by XCL Education Malaysia Central Team.

4. Safer Recruitment in Practice: Deter, Prevent, Reject, Observe

A checklist of these requirements is included in Appendix 2.

4.1 DETER

- All recruitment adverts and promotional materials include a safeguarding statement outlining our commitment to child protection.
- Job packs contain direct links to the Safer Working Practices document and the full Safeguarding & Child Protection Policy.
- Application forms require candidates to provide a full employment history, with no unexplained gaps, and a signed safeguarding self-disclosure.
- CVs alone are not accepted, ensuring consistency in safeguarding checks and candidate screening.

4.2 PREVENT

- A minimum of three verified references is required, including one from the most recent Principal/Head Teacher (Academic) or Line Manager (Non-Academic) or HR Manager.
- All references must be verified by phone and must come from professional sources, not personal contacts.
- Interviews are conducted using a structured format that includes specific safeguarding questions.
- Background checks must be completed prior to any unsupervised access to students and include:
    - Verity screening (all candidates)
    - IC verification for Malaysian staff; Passport and visa checks for expatriates
    - International Child Protection Certificate (ICPC) for applicants who have lived in the UK; Certificate of Good Conduct (COGC) for other nationalities

4.3 REJECT

Applicants are rejected if:

- References cannot be verified
- Gaps in employment history remain unexplained
- Concerns, patterns of behaviour, or discrepancies arise during screening or interview

4.4 OBSERVE

- A safeguarding induction must take place before the official start date, led or approved by the DSL.
- All staff must read and sign the Safer Working Practices policy.
- Documentation is entered and maintained accurately in the Single Central Record (SCR).
- A probation period includes safeguarding observation, feedback, and required annual training.
- Vigilance is maintained through a culture of open dialogue, professional curiosity, and routine supervisory oversight.

5. Roles and Responsibilities

5.1 A full breakdown of responsibilities is provided in Appendix 3.

To ensure robust and consistent implementation of safer recruitment practices, the following roles are defined:

- **HR Business Partner (HRBP):** Oversees recruitment compliance, verifies all documentation, manages background checks, and ensures SCR accuracy.

- **Hiring Manager:** Leads the interview process, assesses safeguarding attitudes, and flags any concerns related to candidate suitability.

- **Principal / Head of School (HOS/CP):** Provides leadership oversight, conducts key references, and authorises risk assessments and final appointments.

- **Designated Safeguarding Lead (DSL):** Reviews red flags, supports suitability decisions, and delivers safeguarding inductions and declarations.

- **Purchasing Officer:** Verifies third-party staff compliance and ensures vendor safeguarding requirements are met.

- **Vendor Manager / External Provider Lead:** Ensures all contracted staff meet pre-employment safeguarding standards and replaces unsuitable personnel.

- **Marketing & Communications Team:** Publishes safeguarding policies online and promotes XCL's safeguarding culture through recruitment materials.

- **XCL Malaysia Central Office (XCMO):** Provides oversight, ensures policy compliance across campuses, and monitors safer recruitment implementation.

Everyone involved in recruitment plays a role in keeping children safe.

6. Single Central Record (SCR)

6.1 The Single Central Record (SCR) is a live, auditable record of all adults who have been vetted and approved to work or volunteer across XCL Education Malaysia campuses. It is a core safeguarding control, maintained with diligence and accuracy.

6.2 Each entry in the SCR includes documentation verifying identity, qualifications, references, safeguarding checks (including ICPC or COGC where applicable), and evidence of completed induction and signed policies.

6.3 No one may begin unsupervised work with students until all background checks are complete and recorded on the SCR. This applies to all staff, contractors, and volunteers. If checks (e.g. certificates of good conduct or ICPC) are delayed, the Head of School or Campus Principal may, in exceptional cases, complete a risk assessment outlining additional supervision measures.

6.4 Reference checks must be completed in all cases before work begins. The urgency to fill a vacancy - such as needing to cover a teaching role - does not justify bypassing safer recruitment procedures.

6.5 Roles and documentation requirements are defined by staff category and risk level in the SCR Matrix (see Appendix 4). This ensures role-appropriate vetting and consistency across sites.

6.6 Any legacy staff employed prior to the formalisation of the current SCR process (pre-2025) must undergo a documented risk assessment. Missing or incomplete documentation must be clearly noted, explained, and followed up within an agreed timeline.

6.7 The SCR is subject to regular internal audits by Central HR and reviewed by the DSL to ensure that safeguarding compliance is embedded and monitored at every level.

7. Raising Concerns

7.1 Concerns about recruitment processes — including irregularities, incomplete vetting, pressure to bypass checks, or safeguarding doubts about a candidate — must be reported immediately to the Principal, or XCL Education Malaysia Central Office Team.

7.2 Staff can also raise concerns through the whistleblowing process if they do not feel safe or confident using internal channels. This process is outlined in the Code of Conduct policy HRM003.

7.2 All concerns are taken seriously and treated with confidentiality. Investigations are conducted impartially and without retaliation. Staff who raise concerns in good faith are protected under whistleblowing procedures and the organisation's duty of care.

8. Sharing Concerns with Future Employers

8.1 Where safeguarding concerns meet the threshold for risk or harm (on the balance of probabilities), XCL Education Malaysia reserves the right to share relevant information with future employers. This is part of our duty of care to protect children and uphold international safeguarding standards.

Such sharing may involve:

- Contacting the next employer's Principal or HR representative
- Submitting a report to the police or Ministry of Education in accordance with legal obligations

8.2 This action may be taken even if no criminal conviction was obtained, provided concerns were substantiated through internal procedures or reflect a pattern of behaviour relevant to child safety. All disclosures will comply with the PDPA 2010 and follow the BISSC Safeguarding Code of Conduct on reference sharing and onward disclosure.

If a concern would make you pause before hiring again as a child may be unsafe, it must be recorded and shared.

9. Monitoring & Compliance

9.1 Ongoing compliance is essential to maintaining the integrity of our safer recruitment process. Regular monitoring activities ensure that systems are working as intended and areas for improvement are promptly addressed. These include:

- Termly recruitment file audits conducted by Central HR to ensure all documentation is complete and correctly stored.
- Routine Single Central Record (SCR) reviews by HR and DSLs to verify accuracy, completeness, and alignment with role requirements.
- Spot checks and recruitment process reviews to test compliance with policy expectations and uncover practice gaps.
- Retrospective vetting and regular risk assessment for legacy staff or volunteers onboarded prior to the implementation of this policy.
- Audit findings and risk areas are reported to the Academic Board and shared with campus leaders to drive improvement.

10. Legal and Policy Alignment

10.1 This policy is informed by and aligned with key national and international legislation, frameworks, and standards that govern the safeguarding of children in education settings. These include:

- Child Act 2001 (Malaysia) – Protects the rights and welfare of children and establishes reporting responsibilities for persons aware of abuse or neglect.
- Sexual Offences Against Children Act 2017 (Malaysia) – Criminalises grooming, child pornography, and abuse of trust by those in positions of authority.
- Personal Data Protection Act (PDPA) 2010, Sections 6 & 39 – Regulates how candidate data is collected, stored, and shared, particularly where safeguarding disclosures are involved.
- Keeping Children Safe in Education (KCSIE), 2025 – Provides best practice guidance for recruitment, vetting, and ongoing vigilance.
- COBIS and BISSC Safeguarding Standards – Set clear expectations for international schools on safer recruitment and record keeping.
- XCL Education Safeguarding & Child Protection Policy – Provides the overarching framework that this policy supports and operationalises.

11. Review

11.1 This policy will be reviewed annually, or earlier following an incident, legal change, or identified weakness.

Safe schools start with safe recruitment. Everyone has a part to play.

Appendix 1: Key Terms Glossary for Safer Recruitment

i. **Single Central Record (SCR)**
A live, centralised record of all adults who work in a school and have regular access to students. It includes documented evidence of safer recruitment checks (e.g. ID, references, background screening, safeguarding training). No adult should work with students unless they are on the SCR.

ii. **Verity Check**
A third-party background screening process used to verify an individual's criminal history, employment record, and other safeguarding-relevant data. Required for all staff and contractors. XCL Education Malaysia apply for this check with the candidates permission.

iii. **ICPC (International Child Protection Certificate)**
A police certificate specifically for UK nationals or those who have worked in the UK. Issued by the ACRO Criminal Records Office, it confirms whether the individual has a criminal record relevant to working with children overseas. This check must be applied for by the individual named, and shared with XCL Education Malaysia.

iv. **COGC (Certificate of Good Conduct)**
A police clearance certificate issued by an individual's country of origin or most recent employment. It is required for expatriates or foreign nationals working in Malaysia and other international contexts.

v. **Safeguarding Training**
Mandatory training that equips adults with the knowledge to recognise, report, and respond to concerns about child abuse or neglect. Must be completed before working with students. This can be coordinated with the Designated Safeguarding Lead for face-to-face or arranged via an e-learning platform.

vi. **Safeguarding Declaration**
A signed statement where the adult agrees to uphold all safeguarding policies, behave in accordance with the Safer Working Practices Guidelines, and disclose any incidents that may affect their suitability to work with children.

vii. **Safeguarding Reference**
A reference that specifically addresses the individual's suitability to work with children, confirming whether there have been any allegations, concerns, or disciplinary actions related to child safety. Must be verified verbally.

viii. **Professional Reference**
A reference from a current or previous employer, supervisor, or colleague who has worked with the applicant in a professional capacity. It confirms:

- Employment dates, responsibilities, and professional conduct

- Work ethic, reliability, and general performance
  A professional reference must come from an official source and cannot be provided by family or friends.

ix. **Verbal Reference**

A telephone call made to a referee (usually a previous employer or line manager) to verify the written reference or to gather additional safeguarding information. This provides an opportunity to:

- Confirm the authenticity of the reference

- Ask follow-up safeguarding questions

- Detect hesitations or concerns not included in written feedback
Verbal references must be recorded using a standard template or summary log.

x. **Principal-to-Principal Reference**

A safeguarding-specific reference conducted directly between the current school Principal (or Head of School) and the prospective employer's Principal. This is used for academic positions, particularly teaching and leadership roles. It should:

- Be conducted by phone using a standard reference template

- Confirm the candidate's conduct with students, professional integrity, and any safeguarding concerns

- Be logged as a verbal safeguarding reference, even if written references have been provided
This process ensures school leaders have direct accountability for staff moving between institutions.

xi. **Equivalent Checks**

When a contractor or vendor is not a school employee but works on campus regularly, they must undergo the same level of screening and safeguarding checks as employees. This ensures they meet the same child protection standards.

xii. **Risk Assessment (Safer Recruitment)**

A documented process used when background checks or historical files are incomplete, particularly for legacy staff or delayed checks. It outlines additional supervision or monitoring until compliance is confirmed.

xiii. **Legacy File**

A staff file created before current safeguarding expectations were fully implemented. These may contain gaps that require retrospective checks or formal risk assessments.

xiv. **Conditional Employment**

Employment that is offered subject to the successful completion of all required checks and verifications. Individuals must not begin unsupervised work until this condition is met.

xv. **Safer Working Practices**

A set of expectations, behaviours, and boundaries that protect students and staff. All staff must sign the Safer Working Practices Guidelines before beginning their role and are expected to adhere to them throughout employment.

Appendix 2: Safer Recruitment Checklist - Deter, Prevent, Reject, Observe.

    a. The following measures apply to all recruitment for contracted employees across XCL Education Malaysia.

    b. Specific requirements are outlined for volunteers, contractors, peripatetic staff, ECA coaches, SPA instructors, and other adults working on campus that are not employed by XCL Education Malaysia.

DETER — Discouraging unsuitable applicants	
1. Safeguarding statement included in all job advertisements.	
2. Recruitment packs clearly outline safeguarding expectations and reference the XCL Safer Working Practices and Safeguarding Policy.	

3. Application forms require:
    a. Full employment history, including explanations for gaps.
    b. Self-disclosure of criminal history, including pending investigations.	

4. Website and recruitment materials communicate our safeguarding culture.	
5. Visible messaging that unsuitable applicants will be rejected and concerns shared with authorities if necessary.	
6. CVs alone are not accepted; all candidates must complete a full XCL Application Form.	
PREVENT — Blocking unsuitable individuals from appointment	

1. Structured interview process with:
    a. At least two trained interviewers, one of whom has completed Safer Recruitment Training.
    b. Safeguarding and scenario-based questions. Mandatory safeguarding questions assessed using a structured assessment criteria.	

2. Employment Offers remain provisional until the satisfactory completion of reference and background checks.	

3. Minimum of **<u>three</u>** references, including:
    a. These must be received from a 'professional email' address, or other verifications can be used to ascertain that the referee is in a position to provide reference
    b. One reference must be obtained from the last Principal / HR representative from last employment
    c. Direct verbal verification of all references.	

4. Mandatory background checks:
    a. Verity background screening for all.
    b. Malaysian Nationals: IC copy.
    c. Expatriate Employees: Passport copy, for identity verification. Visa and work permit checks in line with Malaysian law.
UK Nationals or those who have worked in the UK: International Child Protection Certificate (ICPC). (Cost: GBP 99 – to be paid by employee, and refunded by HR)
    d. Other Nationalities: Certificate of Good Conduct from previous country of employment.	

5. Other Adults on School Site:
    a. Employees in the XCL Malaysia Central Team (non-school based) are subject to the same checks as above, and their information stored on the Central Team SCR
    b. Equivalent checks required for contractors, peripatetic staff, ECA coaches, SPA instructors, and other adults who work unsupervised with children.
    c. Parent Volunteers and Visiting Guests from outside agencies are exempt from checks, but will not be allowed unsupervised contact with children.	

6. No unsupervised student contact permitted until all checks are complete and uploaded into SCR	

7. In exceptional cases where external background checks are delayed, a person may begin work **only after** a documented conversation with the Head of School or Campus Principal outlining monitoring measures. The individual must understand their employment remains conditional until all checks are completed.	
8. For staff employed prior to the SCR's implementation, the Head of School or Campus Principal must complete a risk assessment for any missing information and take all reasonable steps to address the gaps within an agreed timeframe.	
REJECT — Where risks or concerns arise	

1. Applicants are rejected where:
   a. References are unsatisfactory or cannot be verified.
   b. Gaps in employment cannot be reasonably explained.
   c. Background checks indicate risk.
   d. Transferable risk or prior concerning conduct is identified.	

2. Where concerns are identified:
   a. The offer is withdrawn.
   b. Relevant authorities and previous employers may be notified in line with safeguarding expectations.	

OBSERVE — Ongoing vigilance after appointment	
1. Signing of the XCL Safer Working Practices and Safeguarding and Child Protection Policy prior to start date.	
2. Safeguarding induction before working with students.	
3. Addition to the Single Central Record (SCR) with documented checks.	
4. Probationary period with clear performance and conduct monitoring.	
5. Regular safeguarding training for all adults.	
6. Open reporting culture where concerns are shared, recorded, and acted upon.	
7. SCR reviewed and updated regularly to ensure full compliance.	
8. Annual Safeguarding Training and Declaration that Safer Working Practices / Safeguarding Policy has been read and understood.	

Appendix 3: Roles and Responsibilities

To ensure effective implementation of the XCL Education Malaysia Safer Recruitment Policy, the following roles have defined responsibilities in maintaining compliance, promoting a safeguarding culture, and protecting student welfare.

1. HR Business Partner (HRBP)

Key Role: Senior HR team member responsible for recruitment compliance, documentation accuracy, SCR management, and safer recruitment training.

Key Responsibilities:

- Include safeguarding statement in job advertisements.
- Ensure recruitment materials and application forms reflect safeguarding culture and require full employment history and safeguarding declarations.
- Reject CV-only applications; require candidates to complete the full XCL Application Form.
- Verify candidate identity matches official documents (IC/passport).
- Escalate any missing or inconsistent information before progression.
- Oversee all background checks: Verity, ICPC (UK), Certificate of Good Conduct (other nationalities).
- Confirm receipt and direct verbal verification of minimum three professional references, including one from the most recent Principal/HR.
- Ensure no friends/family are used as referees; verify all referees via professional means.
- Coordinate Principal-to-Principal references for academic roles.
- Schedule interviews with at least one trained Safer Recruitment panel member (within 2 years).
- Prepare interview packs with mandatory safeguarding questions and structured assessment criteria.
- Collect completed interview feedback, safeguarding responses, and store documents securely.
- Manage SCR entries for all staff and interns; ensure no SCR entry or unsupervised work until checks are complete.
- Coordinate with Purchasing Officers to cross-reference third-party SCR entries.
- Ensure start dates are only agreed once all references and checks are completed (unless risk-assessed).
- Coordinate with Heads of School / Campus Principals for risk assessments due to legacy files or delayed checks.
- Coordinate with the Marketing & Communications Team to ensure recruitment policy and safeguarding statements are published and updated on relevant websites.

2. Hiring Manager

Key Role: School-based leader (e.g., Principal, Head of Department, Coordinator) leading the selection and interview process.

- Key Responsibilities:
- Review application forms and identify gaps or concerns.
- Confirm completeness of documents with HR.
- Ensure interview panel includes at least one Safer Recruitment trained member.
- Ask safeguarding and scenario-based questions; assess and record responses.
- Fully complete interview feedback and submit to HR.
- Raise red flags related to references, safeguarding concerns, or conduct.
- Ensure no applicant begins unsupervised contact with students until HR clearance is confirmed.

3. Principal / Head of School (HOS/CP)

Key Role: Campus leader responsible for recruitment oversight and final appointment decisions.

Key Responsibilities:
- Conduct Principal-to-Principal references for academic roles.
- Review and approve risk assessments for legacy recruitment gaps or delayed checks (in coordination with HR/DSL).
- Ensure SCR entries are reviewed and verified each term.
- Confirm all staff have signed safeguarding declarations and Safer Working Practices before start date.
- Lead a safeguarding culture across hiring and onboarding practices.

4. Designated Safeguarding Lead (DSL)

Key Role: Trained staff member responsible for safeguarding oversight, suitability decisions, and induction.

Key Responsibilities:
- Review references, gaps, or red flags regarding candidate suitability.
- Consulted when safeguarding concerns arise in the recruitment process.
- Review and advise on SCR accuracy and safeguarding declarations.
- Oversee delivery of safeguarding inductions before staff begin working with students.
- Ensure the annual safeguarding declaration process is delivered, collected, and tracked for all staff.
- Contribute to legacy risk assessments.

5. Purchasing Officer

Key Role: Oversees vendor onboarding and compliance of third-party personnel (e.g., contractors, ECA staff).

Key Responsibilities:

- Collect and verify ID, background checks, safeguarding declarations, and training records.
- Ensure no vendor staff begin work before appearing on the SCR.
- Conduct termly spot checks for conduct, ID, and safeguarding awareness.
- Ensure safeguarding clauses are included in all vendor contracts.
- Coordinate with HR and DSL on missing records or safeguarding risks.

6. Vendor Manager / External Provider Lead

Key Role: Point of contact from a contracted company responsible for staff assigned to XCL campuses.

Key Responsibilities:

- Confirm that all assigned staff have completed required background checks.
- Provide up-to-date lists and documents for replacements and new hires.
- Enforce and uphold safeguarding clauses outlined in XCL contracts.
- Remove or replace any staff identified as a safeguarding concern.

7. Marketing & Communications Team

Key Role: Supports communication of XCL's safeguarding and recruitment standards via digital and printed media.

Key Responsibilities:

- Publish and maintain the Safer Recruitment Policy, safeguarding statement, and Code of Conduct on school and group websites.
- Collaborate with HR to ensure recruitment communications reflect XCL's safeguarding culture.
- Ensure consistency in safeguarding messaging across advertisements, websites, and recruitment events.

8. XCL Malaysia Central Office (XCMO)

Key Role: Oversight body for group-wide policy implementation and compliance assurance.

Key Responsibilities:

- Monitor safer recruitment compliance across campuses.
- Support policy updates and cross-campus consistency.
- Review safer recruitment data and audit findings termly.
- Ensure all teams (HR, Principals, DSLs) are meeting expectations outlined in the Safer Recruitment Policy.

Appendix 4: Single Central Record Matrix

Category of Adult	Examples	Who Updates the SCR	Checks & Actions
Employees (including temporary staff)	Teachers, Admin Staff, Leadership, Facilities Staff, Live-in Wardens, Boarding Support	HR Department	✅ Address ✅ Personal profile ✅ ID Verification (IC/Passport) ✅ Background Check (Verity/ICPC/COGC) ✅ Right to Work (MOE Pass/Employment Pass) ✅ Medical for Teachers ✅ 3 verified references ✅ Safeguarding training (annual) ✅ Signed Safer Working Practices
ECA Coaches / SPA Instructors / Peripatetic Staff	Sports, Arts, Robotics Instructors, Music/Drama teachers, Therapists	Purchasing, HR to verify	✅ Address ✅ Personal profile ✅ ID Verification (IC/Passport) ✅ Background Check (Verity/ICPC/COGC) ✅ 3 verified references ✅ Safeguarding training (annual) ✅ Signed Safer Working Practices
Vendors with Regular Student Contact	Cleaners, Security, Uniform suppliers, Bookstore, Food stall operators	Purchasing, Campus Admin / HR to verify	✅ ID Verification ✅ Background Check (Verity/ICPC/COGC) ✅ Safeguarding training (annual) ✅ Signed Safer Working Practices ✅ Contract safeguarding clauses ✅ Spot checks termly ✅ Equivalent checks as employees
Contractors (no direct contact)	Maintenance, IT Support, Gardeners	Facilities/Operations	✅ ID Verification ✅ Background Check ✅ Vendor safeguarding declaration 🚫 No student contact – must be supervised
Shadow Aides	Parent-funded classroom support	HR Department	✅ Verity check ✅ 3 safeguarding references ✅ ID Verification ✅ Safeguarding declaration ✅ Safeguarding training (annual) ✅ SCR entry before contact
Interns / Student Teachers	University placement students	HR Department	✅ Placement letter ✅ 3 professional references ✅ Verity/police screening ✅ Safeguarding training (annual) ✅ ID Verification ✅ SCR entry before placement
Volunteers / Advisory Board	Parent readers, Event helpers, Board members	Not on SCR unless unsupervised	✅ Supervised at all times ✅ Safeguarding declaration if regular 🚫 No checks unless unsupervised with students

Appendix 5: XCL Malaysia Safer Recruitment – Implementation Flow

This appendix provides a high-level implementation flow for the recruitment of staff employed directly by XCL Malaysia. For daily use and role-specific execution, schools must refer to the editable **Safer Recruitment Implementation Pack** in the XCL Central Teams Folder. This includes templates, checklists, and forms required throughout the recruitment process.

1. Vacancy & Advertising
- Include safeguarding statement in all adverts
- Use approved Application Form (must include full employment history with gap explanations and self-disclosure of criminal history or safeguarding concerns).
- CVs alone are not accepted.

2. Shortlisting
- HR and Hiring Manager screen for gaps, red flags, and matching ID.
- Incomplete or inconsistent applications must be rejected.
- Only applicants meeting minimum criteria proceed to interview.

3. Interview Process
- Minimum of two interviewers, with at least one holding valid Safer Recruitment training.
- Use structured safeguarding questions (from Interview Best Practice Guide).
- Record all responses and evaluation notes.
- Explore motivations, boundary awareness, and child protection reporting confidence.
- For non-academic roles, conduct a safeguarding screening conversation pre-interview.

4. Reference Collection & Verification
- Minimum of three references:
  - One from most recent employer's Principal or HR.
  - None from friends, family, or personal email accounts unless verified.
- References must be:
  - Cross-checked against application history.
  - Verified by phone using the 3-in-1 Reference Call Template.
  - Signed off and securely stored in the candidate's file.

5. Background Checks
- Must be completed before confirming start date:
  - Verity screening (all roles)
  - ICPC (UK nationals or those who've worked in the UK)
  - Certificate of Good Conduct (other nationalities)
  - IC copy (Malaysians) or passport + visa (expats)
- All checks must be verified by HR and recorded in the candidate file.

6. Conditional Offer
- Issued only after all references and checks are complete.
- Must include:
  - Conditional offer letter
  - Signed Safer Working Practices
  - Signed Safeguarding & Child Protection Policy
- If concerns arise:
  - Withdraw the offer
  - Notify relevant authorities and/or former employer
- If checks are incomplete but urgent start is requested:

    o Principal and Central HR must complete a documented risk assessment outlining additional monitoring. This does not apply to reference checks, which must be complete.

7. SCR Entry (Single Central Record)
- Candidate added to SCR only once:
  - All checks and references are verified
  - Code of Conduct is signed
  - Identity is confirmed
  - Safeguarding documents are uploaded to the personnel file
- Final compliance check by HR before SCR entry.
- Monthly SCR reviews conducted by DSL or Principal.

8. Safeguarding Induction & Training
- Must be completed before student contact.
- Includes:
  - Face-to-face induction with DSL
  - Completion of XCL safeguarding e-learning module (within two weeks)
  - Assignment of onboarding mentor or line manager

9. Probation & Conduct Monitoring
- Probation includes regular check-ins on performance and safeguarding conduct.
- Reinforcement of safer working practices and reporting duties.

10. Annual & Ongoing Compliance
- SCR spot checks and full reviews at least once annually.
- Mandatory annual safeguarding training and signed declarations.
- Legacy staff (employed before SCR implementation) must have a documented risk assessment where gaps exist (see Appendices 2 & 3).
- Any recruitment concerns must be escalated to the Principal, Central HR, or XCMO.

📌 **Note:** This flow applies only to XCL-employed staff. For ECA coaches, vendors, interns, or shadow aides, refer to Appendix 3: SCR Matrix.

To ensure that this implementation flow is successful, Schools must use the editable Implementation Pack. This ensures full compliance and consistency across all campuses.

To ensure consistency across the XCL Malaysia group, a central Teams folder has been created. This folder contains up-to-date documents to support the implementation of safer recruitment procedures across all campuses. The following documents are available:

- ***Application Form Template*** *– Standardised format to ensure all required information is collected from candidates.*

- ***Interview Questions – Best Practice Guide*** *– A resource to support structured interviews, including mandatory safeguarding questions and suggested prompts.*

- ***Risk Assessment Template (Safer Recruitment)*** *– Used for documenting additional supervision or justification when background checks are delayed or legacy gaps are identified.*

- ***Principal-to-Principal Reference Template*** *– A standard form to ensure consistency in academic reference collection.*

- ***Verbal Reference Log Template*** *– To record outcomes of verbal reference checks, including safeguarding follow-up questions.*

- ***Safeguarding Declaration Form*** *– Standard form to be signed by all adults working with children.*

All staff involved in recruitment must use the most recent versions of these documents to maintain compliance and uphold safeguarding standards.