

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 2026

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1. Our Commitment

1.1 At XCL Education Malaysia, safeguarding begins with recruitment and continues throughout employment. We are committed to appointing and retaining only those who are suitable to work with children. Our approach is aligned with Malaysian law, current Keeping Children Safe in Education (KCSIE) guidance, Council of British International School (COBIS) standards, the British International Schools Safeguarding Coalition (BISSC) Safer Recruitment Code of Conduct and recognised international safeguarding practice.

"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, 2026), 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.

1.5 Suitability to work with children is not assessed only at the point of appointment. It must be considered before appointment, during induction and probation, throughout employment, and whenever new information or concerns become available.

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 and monitor suitability following appointment through safeguarding induction, probation reviews, annual declarations, training, supervision, performance management, adult conduct reporting and continued professional vigilance.

2.2 These requirements apply to every adult whose work may bring them into contact with children through XCL Education Malaysia, whether employed directly or engaged through another organisation. This includes employees, temporary and agency staff, central office colleagues, contractors, consultants, coaches, volunteers, interns, governors or board representatives, vendors, external providers and adults engaged for off-site or online activities.

2.3 Safer recruitment does not end when an offer is made or when employment begins. Induction, probation, supervision, annual declarations, adult conduct reporting and ongoing review are essential to maintaining confidence in an adult's suitability to work with children.

2.4 Everyone involved in recruitment must exercise professional curiosity. Inconsistencies, unexplained changes, incomplete information, unusual patterns of employment, rehearsed responses or attitudes that suggest weak professional boundaries must be explored and recorded rather than accepted at face value.

2.5 All BISSC safer recruitment standards have been applied with contextual adaptations for Malaysia, ensuring rigorous, pragmatic, and locally relevant verification using National Registration Identity Card (NRIC) and passport-based checks. Full details are provided in Appendix 6.

3. Safer Recruitment Training

3.1 All HR Business Partners, Hiring Managers and any other staff involved in shortlisting, interviewing, checking references or making appointment decisions must complete XCL-approved safer recruitment training before undertaking these responsibilities.

Safer recruitment training is specialist, role-specific training and is separate from the annual basic safeguarding training required for all staff. It must be refreshed at least every two years, or sooner where changes to guidance or policy, or identified gaps in practice, require it.

3.2 Every member of an interview or selection panel must have completed approved safer recruitment training before participating in any recruitment activity. Training may be delivered through an approved face-to-face or online programme, including an approved e-learning module.

3.3 All Maintenance, Operations and Business Services and other relevant staff involved in appointing, managing or checking contractors and vendors must receive role-specific training as part of their induction and before undertaking these responsibilities. This must include:

- Safeguarding requirements for contractors and vendors
- The checks required for different categories of worker
- Which individuals must be included on the Single Central Record
- The evidence that XCL must obtain and retain
- Vendor declarations and assurance requirements
- Arrangements for supervision, access and ongoing monitoring

This training must be refreshed at least every two years, or sooner when responsibilities, policy or procedures change.

3.4 Everyone responsible for entering, maintaining, checking, quality-assuring or auditing information on the Single Central Record must complete role-specific SCR training before undertaking these responsibilities. This training must cover documentation standards, required checks, audit requirements, compliance monitoring and the management of identified gaps. It must be refreshed at least every two years, or sooner where requirements or procedures change.

3.5 Ongoing development and updates will be provided through the XCL Safeguarding Training Hub. Relevant staff are expected to remain informed about emerging risks, safeguarding concerns and changes to safer recruitment practice. Hub content may include professional curiosity, recruitment procedures, safeguarding interview questions, reference checking, documentation standards, contractor and vendor management, lessons from audits and developments in safer recruitment practice.

3.6 Vendors must sign the approved XCL safeguarding declaration before their personnel begin work on an XCL site. The school must provide basic safeguarding training or induction to all contractor and vendor personnel who will work on school premises or have contact with or access to students. This must be completed before work begins and must include:

- Expected standards of conduct
- Professional boundaries
- How to identify and report a safeguarding concern
- The identity and contact details of the school's Designated Safeguarding Lead
- Site-specific access, supervision and emergency arrangements

3.7 Completion of all required training, induction and declarations must be recorded and monitored by the responsible HR, Business Services or school team.

Principals or the relevant appointed school leader must be able to confirm that those involved in recruitment, contractor and vendor management, and the SCR are appropriately trained.

Compliance and identified gaps will be overseen by the XCL Education Malaysia Central HR and Safeguarding teams.

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

XCL Education Malaysia is committed to ensuring that employees and non-employees are appropriately recruited, checked, inducted and monitored according to their role and level of access to children.

Detailed requirements are set out in the relevant safer recruitment and safeguarding checklists. Completion and approval must be recorded on the Single Central Record (SCR).

4.1 Employees

Before an appointment is confirmed, HR and the Hiring Manager must ensure that:

- Recruitment materials clearly state XCL's commitment to safeguarding and child protection.
- The job description includes responsibility for safeguarding children, following the Code of Conduct and reporting concerns.
- The candidate has completed the mandatory XCL application form and safeguarding self-declaration. A CV may provide supplementary information but must not replace the application form.
- The candidate's full employment and activity history has been reviewed, and any gaps, discrepancies, previous names or unexplained changes have been explored and documented.
- Three satisfactory professional references have normally been obtained for employees and independently verified, including the current or most recent employer. For those not employed by XCL safeguarding references should be secured.
- At least one safeguarding-specific reference has been verified through a live telephone or video conversation.
- The candidate has completed a structured interview that includes role-appropriate safeguarding questions. All panel members must have completed approved safer recruitment training.
- Identity, qualifications and required background checks have been verified.
- For Malaysian citizens, identity has been verified through the NRIC.
- For expatriate candidates, the immigration permission required has been identified and the candidate's eligibility has been reviewed. The appropriate Employment Pass or other legal authorisation must be obtained and verified before employment begins.
- Any disclosure, concern or conflicting information has been explored and assessed before a final decision is made.

Where three professional references cannot reasonably be obtained, an exception may be considered. At least two satisfactory references should normally still be obtained, together with alternative verification, a documented risk assessment and joint written approval from the Principal and Central HR Team.

4.2 Concerns Identified During Recruitment

A gap, discrepancy, disclosure, allegation or other concern does not automatically prevent appointment. The candidate must be given a fair opportunity to respond and provide relevant information.

School Leadership and an appropriately senior HR representative must be consulted where information raises a safeguarding, adult-conduct or suitability concern.

A candidate must not be appointed where:

- Identity or the required legal authorisation to work cannot be verified.
- A required background check cannot be satisfactorily completed.
- Information has been deliberately falsified, concealed or materially misrepresented.
- A legal restriction prevents the person from undertaking the role.
- The identified risk to children cannot be reduced to an acceptable level.

Where a concern remains but does not automatically prevent appointment, a written safeguarding risk assessment must be completed. Any decision to proceed must be jointly authorised in writing by the Principal and Central HR Team and must identify any restrictions, control measures, monitoring responsibilities and review date.

4.3 Recording Requirements

The SCR must record the completion date, status, outcome and checker for each required recruitment or safeguarding check.

Applications, self-declarations or disclosure emails, references, verification records, interview notes, risk assessments and supporting evidence must be retained securely on the SCR.

Where a reference or other recruitment document contains highly confidential information requiring more restricted access, the SCR must record that the information has been reviewed and identify where the full record is securely held. Sensitive details must not be reproduced unnecessarily on the SCR.

The SCR must be maintained by the responsible HR or administrative team and formally quality-assured each month by the DSL or another appropriately trained senior leader delegated by the Principal.

4.4 Non-Employees Working on Site

This category applies to adults supplied by another organisation whose role does not involve teaching, coaching, caring for, supervising, treating or providing individual support to children.

It may include:

- Cleaners and security personnel
- Canteen, bookstore and uniform-supplier staff
- Maintenance workers, gardeners and IT support
- Photocopier technicians
- Temporary event suppliers and other visiting contractors

The employing organisation remains responsible for recruiting and checking its personnel. Before deployment, XCL must ensure that:

- The contract includes XCL's safeguarding requirements.
- The vendor confirms that the required background checks have been completed.
- The individual's identity and legal right to work have been verified.
- An approved personnel list has been provided.
- The individual has signed the XCL safeguarding declaration.
- The individual has received a basic, site-appropriate safeguarding induction.
- Access, identification and supervision arrangements have been agreed.
- The relevant information has been recorded on the SCR.

The vendor must retain the underlying background-check records and provide evidence of completion when requested. XCL must review the vendor's assurance and approved personnel list at least every 45 days.

A vendor or contractor must inform XCL before introducing a new or replacement worker. Where a person will work on site for more than one day, the vendor's supervisor must complete the approved personnel confirmation process before access is granted.

Adults attending for a one-off event or temporary task must remain within approved areas and under appropriate supervision. They must not be left alone with children.

4.5 Non-Employees Working Directly with Children

This category applies to any non-employee whose role involves teaching, coaching, caring for, supervising, assessing, treating or providing individual support to children. These adults occupy a position of trust and must undergo individual safer recruitment checks.

This may include:

- ECA coaches

- Sports, arts, robotics and SPA instructors
- Peripatetic music or drama teachers
- Swimming instructors and swimming teachers
- Therapists
- 1:1 Learning Aides
- Interns and student teachers (these should be recorded as temporary staff)

Before the individual has contact with children:

- A personal profile or CV and complete employment history must be reviewed.
- Identity and legal right to work must be verified.
- XCL must complete the required background checks for those who work directly with children.
- Three satisfactory safeguarding references must normally be obtained and verified. Where previous schools are listed in the person's employment history, the DSL of each relevant school should be contacted directly regarding safeguarding, adult-conduct and suitability concerns. Business Services may ask the XCL DSL to undertake these conversations.
- At least one safeguarding-specific verbal reference must be completed.
- Required qualifications, registration, licences and role-specific certificates must be verified.
- The individual must complete annual safeguarding training.
- The individual must sign the safeguarding declaration and acknowledge the Safer Working Practices.
- The individual must be entered on the SCR and formally approved before beginning work with children.

Where three professional references cannot reasonably be obtained, at least two should normally be secured. Any exception requires alternative verification, a written risk assessment and the required senior approval.

Additional role-specific checks must include, where applicable:

- Current swimming-teaching or coaching qualifications
- Current lifeguarding and first-aid certification
- Professional qualifications, registration or licences for therapists
- A placement letter and professional references for interns and student teachers
- A clear role description and agreed supervision arrangements for shadow aides

4.6 Induction and Ongoing Monitoring

Before commencing unsupervised work with children, every adult must:

- Complete the required safeguarding induction and role-appropriate training.
- Understand how to identify and report a concern.
- Know the identity and contact details of the school's DSL.

- Acknowledge the Safeguarding and Child Protection Policy, Code of Conduct and Safer Working Practices applicable to their role.

Employees must complete annual safeguarding training and the annual safeguarding and conduct declaration. Probation reviews must explicitly consider safeguarding practice, professional boundaries, conduct, response to feedback and any concerns raised.

New information, complaints, allegations, low-level concerns or adult-conduct concerns must be reported and considered promptly. Leaders must consider concerns collectively, maintain professional curiosity and restrict an adult's access to children where necessary while concerns are assessed.

5. Roles and Responsibilities

5.1 A full breakdown of responsibilities is provided in [Appendix 3](#). The following roles are defined to ensure clear accountability and consistent implementation of safer recruitment:

- **Human Resources Business Partner (HRBP):** Oversees employee recruitment compliance; verifies identity, right to work, references and required checks; maintains recruitment records and the SCR; escalates concerns; and ensures no employee begins unsupervised work until the required clearance is complete.
- **Hiring Manager:** Leads a structured, fair and documented selection process; assesses safeguarding attitudes, professional boundaries and suitability; explores gaps or inconsistencies; records the evidence considered; and escalates concerns rather than making an isolated suitability decision.
- **Principal / Head of School:** Holds school-level accountability for implementing this policy; ensures recruitment panels are appropriately trained; reviews significant concerns; authorises safeguarding risk assessments within the limits of this policy; and jointly approves exceptional appointments with the designated senior HR approver.
- **Designated Safeguarding Lead (DSL):** Provides safeguarding expertise where recruitment information raises concerns about conduct, suitability or risk to children; contributes to risk assessments, induction and monitoring arrangements; and ensures concerns are connected with the appropriate adult-conduct and safeguarding procedures. The DSL does not replace HR's responsibility for completing recruitment checks or maintaining the SCR.
- **Business Services:** Oversees safeguarding assurance for vendors, contractors and temporary site personnel; ensures contracts contain safeguarding requirements; maintains vendor and temporary-access records; coordinates required checks and declarations; reviews vendor assurance every 45 days; and ensures appropriate access and supervision arrangements are in place.
- **School Supervisor / Event Organiser:** Provides day-to-day oversight of temporary vendors and contractors; delivers the required site briefing; maintains agreed access and supervision arrangements; and reports any extension of access or concern immediately.

- **Marketing and Communications:** Ensures XCL's safeguarding commitment is communicated consistently through recruitment materials, websites and public information.
- **XCL Malaysia Central Office:** Provides country-level policy oversight, quality assurance and professional support, including auditing recruitment records, SCR compliance and vendor-assurance arrangements; analysing recurring weaknesses; supporting complex decisions; and reporting significant risks and trends.

Everyone involved in recruitment, appointment, deployment or site access shares responsibility for keeping children safe.

6. Single Central Record (SCR)

6.1 The Single Central Record is a live, secure and auditable record of the recruitment and vetting status of all adults within its defined scope. It provides assurance that the required checks have been completed.

6.2 The SCR must be completed and maintained in accordance with the **XCL Malaysia SCR Guide ([Appendix 5](#))** and **SCR Matrix ([Appendix 4](#))**. These documents define:

- Which adults must be included on the SCR
- The checks required for each staff and non-employee category
- Who is responsible for completing and verifying each check
- How outcomes, exceptions and risk assessments must be recorded
- The evidence that must be retained and where it should be stored
- The required review and quality-assurance arrangements

The current versions of the SCR Guide and Matrix must always be used. Locally amended or previously downloaded versions must not be used.

6.3 For every required check, the SCR must record the completion date, the person who verified it and the outcome or status. Any approved exception, risk assessment, restriction or review date must also be clearly recorded. Supporting evidence must be retained securely in the appropriate personnel, contractor or volunteer record and must not be embedded unnecessarily within the SCR.

6.4 No adult may begin unsupervised work with students until all checks required by the SCR Guide and Matrix have been completed, assessed as satisfactory and recorded on the SCR. This applies to employees, contractors, volunteers and other non-employees working directly with children.

Where a background check, such as an ICPC or Certificate of Good Conduct, is unavoidably delayed, an exceptional start may only be authorised following completion of the approved safeguarding risk-assessment process set out in the SCR Guide. The assessment must specify the additional supervision, restrictions, responsible person and review date, and must receive the required written approval before work begins.

6.5 The required professional references, including at least one verified safeguarding-specific reference, must be received, independently verified and assessed as satisfactory before work begins. Operational urgency does not justify bypassing this requirement. Any permitted exception must follow the approval and risk-assessment process specified in the SCR Guide.

6.6 The applicable requirements must be determined by the person's staff category, role and level of access to children, using the SCR Matrix in Appendix 4. Where a role does not fit clearly within an existing category, HR or Business Services must consult the DSL and Central HR before access or deployment is approved.

6.7 Legacy employees appointed before the formalisation of the current SCR process in 2025 must be reviewed against the SCR Guide and Matrix. Missing or incomplete documentation must be clearly identified and explained, with a documented risk assessment, responsible person and agreed completion date.

6.8 HR is responsible for maintaining employee SCR records. Business Services is responsible for coordinating the required records for vendors, contractors and temporary site personnel, with HR verification where specified in the SCR Guide and Matrix.

6.9 The SCR must be regularly quality assured and reported on monthly. Central HR and Business Services must review the categories for which they are responsible, and the DSL must provide safeguarding oversight. Identified omissions, expired checks or unauthorised access must be escalated and addressed promptly.

7. Raising Concerns

7.1 Any concern about recruitment practice, incomplete or inaccurate checks, document integrity, pressure to bypass requirements, unauthorised site access or an adult's suitability to work with children must be reported immediately to the Principal, the relevant HR or Business Services leader, or the Group Safeguarding Director, as appropriate.

7.2 A concern involving the Principal must be escalated directly through the central safeguarding or whistleblowing route. A concern involving another senior leader must be reported to a leader with sufficient independence and authority to act.

7.3 Staff may use the whistleblowing process where they do not feel safe or confident raising the matter through normal internal channels. The process is set out in the Code of Conduct Policy HRM003.

7.4 Concerns must be taken seriously, recorded appropriately and considered impartially. Information will be shared only with those who need it to assess the concern, protect children or meet legal and organisational responsibilities. Staff who raise concerns honestly and in good faith must not be subjected to retaliation or disadvantage.

8. Sharing Safeguarding Information with Future Employers

8.1 XCL Education Malaysia will provide references that are accurate, fair, evidence-based and consistent with its duty to safeguard children, Malaysian law and the Personal Data Protection Act 2010. Information materially relevant to an individual's suitability to work with children must not be deliberately concealed where it is lawful and appropriate to disclose it.

8.2 Information considered for disclosure may include:

- Substantiated safeguarding or adult-conduct findings.
- A documented pattern of behaviour relevant to professional boundaries or child safety.
- Relevant disciplinary findings.
- Restrictions placed on the individual's work with children.
- Other information that materially affects their suitability for the proposed role.

The absence of a criminal conviction does not, by itself, prevent XCL from considering whether relevant, substantiated information should lawfully be disclosed.

8.3 Safeguarding information must only be shared by an authorised HR or senior safeguarding leader following appropriate consideration of:

- The evidence available and outcome of any completed process.
- The relevance of the information to the proposed role.
- Fairness, accuracy and proportionality.
- The safety and welfare of children.
- Confidentiality and data-protection requirements.
- Any legal advice required.

Where appropriate, information should be shared directly with the receiving organisation's authorised Principal, HR representative or safeguarding leader through a secure and documented process.

8.4 Where information indicates that a child may have been harmed or a criminal offence may have occurred, XCL will consider its reporting responsibilities to the relevant statutory or law-enforcement authority. Statutory reporting and the provision of an employment reference are separate processes and must be managed accordingly.

8.5 If information about an individual would cause XCL to pause before employing or deploying them again because a child might be placed at risk, the concern must be recorded and escalated for a formal decision about lawful disclosure. It must not be ignored or informally omitted.

8.6 Safeguarding records and relevant findings must not be deleted, concealed or made subject to an agreement that prevents lawful safeguarding disclosure. Any settlement, agreed reference or confidentiality provision must preserve XCL's ability to meet its safeguarding, reporting and legal responsibilities.

9. Monitoring and Compliance

9.1 Ongoing monitoring is essential to ensure that safer recruitment systems operate as intended and that weaknesses are addressed promptly. Monitoring will include:

- Termly sampling of recruitment files by Central HR.
- Formal SCR quality assurance under the oversight of the Principal or Head of School, following the schedule in the SCR Guide.
- Review of role-specific qualifications, professional registrations, licences and time-limited certificates.
- Business Services review of vendor personnel and safeguarding assurance every 45 days.
- Proportionate spot checks of vendor personnel, identification, records and safeguarding awareness.
- Recruitment-process reviews to identify inconsistent or non-compliant practice.
- Follow-up of legacy gaps, exceptional appointments and outstanding risk-assessment actions.
- Confirmation that restrictions, supervision arrangements and review dates remain effective.

9.2 Audit findings must identify required actions, responsible persons and completion dates. Significant risks, recurring weaknesses and overdue actions must be escalated through XCL Education Malaysia's safeguarding governance arrangements.

9.3 Governance reporting should include proportionate information on:

- SCR completeness and accuracy.
- Missing, expired or overdue checks and professional credentials.
- Exceptional appointments and safeguarding risk assessments.
- Recruitment-file audit outcomes.
- Safer recruitment training compliance.
- Vendor-assurance compliance.
- Recurring weaknesses and corrective action.

Personally identifiable information must be included only where necessary for safeguarding, decision-making or legal purposes.

9.4 Central HR, Business Services and Safeguarding will jointly quality-assure the areas for which they are responsible, provide appropriate challenge and support, and require

corrective action where practice does not meet policy expectations. The Principal or Head of School retains setting-level accountability for implementation.

10. Legal, Policy and Standards Alignment

10.1 This policy is informed by the following Malaysian legislation, international-school standards and XCL policies:

- Child Act 2001 (Malaysia) – establishes protections for children and specific duties to report where prescribed by the Act.
- Sexual Offences Against Children Act 2017 (Malaysia) – criminalises sexual offences against children, including grooming and offences involving child sexual-abuse material.
- Personal Data Protection Act 2010 (Malaysia) – governs the processing, retention and disclosure of personal data.
- Keeping Children Safe in Education 2026 – used by XCL as an international best-practice reference for safer recruitment, selection, vetting and ongoing vigilance.
- British International Schools Safeguarding Coalition Safer Recruitment Cross-Association Code of Conduct 2025 – provides international-school safer recruitment expectations, subject to host-country law.
- COBIS Standards for British Schools Overseas 2024 – provides relevant expectations for safeguarding, recruitment and organisational assurance.
- XCL Education Safeguarding and Child Protection Policy – provides the overarching safeguarding framework supported by this policy.
- XCL Code of Conduct and Safer Working Practices – establish the conduct and professional-boundary expectations applicable after appointment or deployment.
- XCL Malaysia SCR Guide and SCR Matrix – define the operational checking, recording and quality-assurance requirements for different categories of adults.

10.2 Malaysian law takes precedence where it differs from international guidance or standards. This policy must not be interpreted as replacing legal advice or statutory reporting requirements.

11. Review

11.1 This policy will be reviewed at least annually and earlier where required following:

- A safeguarding incident or serious recruitment concern.
- A change in legislation, statutory guidance or organisational structure.
- A significant audit finding or recurring compliance weakness.
- A change to XCL's safeguarding standards, systems or recruitment arrangements.

11.2 Central HR and Safeguarding are responsible for coordinating the review, with input from Business Services, Principals and other relevant stakeholders. Updated versions must be formally approved, communicated and published in the central Teams folder. Superseded local copies must not be used.

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

Appendix 1: Key Terms Glossary for Safer Recruitment

- i. **Adult Conduct Concern**
Information about an adult's behaviour, professional boundaries, conduct or suitability to work with children, including low-level concerns and safeguarding allegations.
- ii. **Certificate of Good Conduct (COGC)**
An official document confirming an individual's criminal-record status in the issuing country. Equivalent checks may be required from relevant countries of nationality, residence or employment.
- iii. **Conditional Offer of Employment**
An employment offer subject to satisfactory completion of all required safer recruitment checks. The individual must not begin unsupervised work until all conditions are met or a formal safeguarding risk assessment is approved.
- iv. **Equivalent Assurance**
Alternative evidence used when a standard check cannot reasonably be obtained. It must provide comparable safeguarding assurance and be documented and approved.
- v. **International Child Protection Certificate (ICPC)**
A safeguarding-focused police check issued by ACRO for eligible individuals applying to work with children overseas. The applicant must apply for and provide the certificate.
- vi. **Legacy File**
A personnel file created before current safer recruitment requirements were introduced and which may require retrospective checks or a documented safeguarding risk assessment.
- vii. **Ongoing Suitability**
The continuing assessment of an adult's suitability to work with children following appointment, including through induction, probation, supervision, declarations and conduct monitoring.
- viii. **Principal-to-Principal Reference**
Direct safeguarding-specific contact between the applicant's current or most recent Principal and the recruiting Principal. The discussion and outcome must be recorded.
- ix. **Professional Curiosity**
The practice of questioning, verifying and following up information that is incomplete, inconsistent or unclear rather than accepting it at face value.
- x. **Professional Reference**
A reference from a current or previous employer or supervisor who can provide objective information about the applicant's employment, performance and conduct. It must not be provided by a relative or friend.
- xi. **Safer Recruitment Training**

Role-specific training required for anyone involved in recruitment, selection, reference checking or SCR oversight. It must be renewed every two years.

- xii. **Safer Working Practices**
XCL's expectations for appropriate professional conduct and boundaries when working with or around children.
- xiii. **Safeguarding Declaration**
A signed declaration confirming relevant information affecting the applicant's suitability to work with children and their agreement to comply with XCL safeguarding requirements.
- xiv. **Safeguarding Reference**
A professional reference that specifically addresses the applicant's conduct, professional boundaries and suitability to work with children, including any relevant concerns, allegations or disciplinary findings.
- xv. **Safeguarding Risk Assessment**
A documented assessment used where a required check is delayed or unavailable, or suitability concerns require formal consideration. It records the risks, safeguards, approvals and review arrangements.
- xvi. **Safeguarding Training**
Mandatory training on recognising, responding to and reporting safeguarding concerns. It must be completed before the individual works with children and renewed annually.
- xvii. **Single Central Record (SCR)**
The central record of required identity, vetting, qualification, training and safeguarding checks for adults working in or regularly attending the school.
- xviii. **Verbal Reference Verification**
A recorded telephone or video conversation with an independently verified referee to confirm a written reference and explore the applicant's suitability to work with children.
- xix. **Verity Check**
Third-party background screening used by XCL to verify relevant identity, criminal-record, employment and other suitability information, with the applicant's consent.

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

- This checklist summarises the minimum safer recruitment requirements that apply across XCL Education Malaysia.
- Appendix 2A outlines the requirements apply to all contracted employees or those who are working full time on site without supervision when working with children.
- Appendix 2B applies to volunteers, contractors, visiting professionals, peripatetic staff, ECA providers, SPA instructors, interns and other adults.

Appendix 2A: Employee Safer Recruitment Checklist

How to use: Tick each item only when the requirement is complete. All evidence should be recorded onto the Single Central Record, which must be completed before the employee starts work.

Candidate	_____
Role and school/campus	_____
HR Business Partner	_____ Hiring Manager: _____
Proposed start date	_____ Checklist opened: _____

1. Prepare the recruitment

Done	Requirement	Notes	Date / initials
☐	Job advertisement and recruitment materials include XCL's safeguarding commitment and state that appointment is subject to safer recruitment checks.		
☐	Job description states the postholder's duty to safeguard children, follow the Code of Conduct and Safer Working Practices, and report concerns.		
☐	Every person involved in shortlisting, interviewing, reference checking or the appointment decision has current XCL-approved safer recruitment training (refreshed at least every two years).		

2. Application and shortlisting

Done	Requirement	Notes	Date / initials
☐	Mandatory XCL application form is complete. A CV or external platform submission has not been accepted as a substitute.		
☐	Complete chronological employment, education and activity history has been reviewed; all gaps, overlaps, short appointments and career changes have been explored and recorded.		
☐	Previous names or aliases have been declared and checked across the application and identity documents.		
☐	Safeguarding and criminal-record self-declaration (or confirming email) has been received and reviewed before interview.		
☐	Any omission, discrepancy, disclosure or change from information supplied elsewhere has been explored, risk assessed and recorded.		

3. Interview and suitability assessment

Done	Requirement	Notes	Date / initials
☐	A structured interview has been completed by a trained panel and includes role-appropriate safeguarding questions and scenarios.		
☐	The candidate's motivation, professional boundaries, response to concerns and understanding of safeguarding responsibilities have been assessed.		
☐	All panel members have made sufficiently detailed notes to show how safeguarding and suitability were considered. These have been recorded onto the SCR.		
☐	Any discrepancy, unresolved concern, investigation, allegation, resignation during a process or pattern of short appointments has been explored fairly with the candidate.		

4. Professional references

Done	Requirement	Notes	Date / initials
☐	Three satisfactory professional references have been obtained, including the current or most recent employer and, wherever possible, two direct supervisors.		
☐	For a school-based role, at least one referee is the Principal, Headteacher or another appropriately senior leader.		
☐	Each reference was obtained directly through an independently verified route; referee identity, role and authority were checked.		
☐	Where a public email address (such as Gmail) is used, HR independently verified that it is the organisation's official address. Candidate confirmation alone not accepted.		
☐	Standard safeguarding questions were asked, including suitability to work with children, concerns/allegations, disciplinary or improvement processes, unresolved investigations and willingness to re-employ.		
☐	At least one reference, normally from the current or most recent employer, was verified through a live telephone or video conversation before appointment.		
☐	Verification notes record the date, person contacted, method of identity verification, questions, response, concerns and follow-up.		
☐	Any vague, incomplete, contradictory or concerning information was followed up and resolved before the decision. This was recorded onto the SCR.		

Reference exception: If three satisfactory references cannot reasonably be obtained for a valid, evidenced reason, at least two should normally still be secured. Alternative verification, a written risk assessment and joint written approval from the Principal and Chief HR Officer are required.

5. Identity, qualifications and background checks

Done	Requirement	Notes	Date / initials
☐	Original identity has been verified: NRIC for a Malaysian citizen, or passport for an expatriate candidate.		
☐	Malaysian citizenship and identity verified through the candidate's NRIC or the candidate's immigration status has been reviewed, the required right-to-work authorisation has been identified, and responsibility for obtaining it has been confirmed.		
☐	Required qualifications and professional credentials have been checked against original or appropriately authenticated evidence and independently verified where necessary.		
☐	Verity screening / other background screening has been completed and the outcome reviewed.		
☐	International Child Protection Certificate has been obtained where the candidate is eligible because of relevant UK history.		
☐	Certificate of Good Conduct or appropriate police clearance covers other relevant countries in which the candidate has lived, worked or studied in the last 10 years.		
☐	Names, dates of birth and other identifiers are consistent across the application and all evidence; any discrepancy has been resolved.		

6. Decision and management of concerns

Done	Requirement	Notes	Date / initials
☐	School Leadership and senior HR representative were consulted where any information raised a safeguarding, adult-conduct or suitability concern.		
☐	The candidate was given a fair opportunity to respond and provide relevant evidence.		
☐	Where a concern remains, a written safeguarding risk assessment considers all evidence, seriousness, pattern, access to children, vulnerabilities and sustainable controls.		
☐	The candidate has not been appointed where a non-deferrable check failed, information was deliberately falsified or concealed, a restriction prevents appointment, or risk cannot be reduced to an acceptable level.		
☐	Any decision to proceed despite a remaining concern or permitted exception has joint written approval from the Principal and HR Central Team, with controls, owner and review date.		

Non-deferrable before starting: Verified identity; confirmed right to work; completed XCL application form and self-declaration; and the Malaysian in-country background checks. No person may have unsupervised access to children while any required safeguarding check remains outstanding. Training may be scheduled for Day 1, and must take place before any contact with children.

7. Recording, induction and start approval

Done	Requirement	Notes	Date / initials
☐	Application, self-declaration/email, references, verification notes, interview notes, risk assessments and supporting evidence are retained securely on the Single Central Record		
☐	Where a reference or other document contains highly confidential information requiring more restricted access, the SCR records that the information has been reviewed and clearly identifies where the full record is securely held. Sensitive details are not reproduced unnecessarily on the SCR.		
☐	Safeguarding induction and role-appropriate training are complete before unsupervised work with children.		
☐	Candidate has read and acknowledged the Safeguarding and Child Protection Policy, Code of Conduct, Safer Working Practices and reporting requirements.		

Appendix 2B: Non-Employee Safeguarding Checklist

Complete the section that applies to the individual's role and access to children.

Extra-Curricular Coach or Teacher Single Central Record Category: Contractor Responsible: Business Services	
1. Non-Employee with Direct Access to Children	Examples: ECA/SPA coaches, sports, arts or robotics instructors, peripatetic teachers and therapists.
☐ Identity verified using NRIC or passport ☐ Verify Address so that personnel is traceable ☐ Required immigration permission/right to work verified ☐ Required background checks completed ☐ Three safeguarding references obtained and independently verified ☐ At least one safeguarding-specific verbal reference completed ☐ Relevant qualifications, registrations or licences verified for swimming coaches / lifeguards or therapists / counsellors ☐ Annual safeguarding training completed ☐ Safeguarding and Child Protection Policy and Safer Working Practices read and signed ☐ Annual Safeguarding declaration completed ☐ Individual recorded on the SCR ☐ Approved before working with children	
2. Employees with required qualifications or credentials that expire.	Examples: Non employed swimming coaches and lifeguards, counsellors, nurses
Complete all direct-access checks above, plus: ☐ Recognised swimming-teaching, counsellor, nursing or coaching qualification verified ☐ Current lifeguarding certification verified, where required ☐ Current first-aid certification verified ☐ Current nursing license certification verified ☐ Current counselling license certification verified ☐ Expiry date of credentials recorded on the SCR ☐ Pool-specific and 1:1 working safeguarding and emergency induction completed	

1:1 Learning Aide and Supply Staff**Single Central Record Category: Contractor****Responsible: HR****1. Non-Employee contracted by a parent to work 1:1 with a child**

Examples: Supply Staff (e.g: Cover Teacher/Admin Personnel) from an external agency, Shadow Aides or 1:1 Learning Assistants employed by a parent and working in school.

- ☐ XCL Malaysia Role outline shared and agreed with parent
- ☐ Identity and right to work verified
- ☐ Verify Address so that personnel is traceable
- ☐ Required background checks completed
- ☐ Three safeguarding references obtained and verified
- ☐ At least one safeguarding-specific verbal reference completed
- ☐ Safeguarding and Child Protection Policy and Safer Working Practices read and signed
- ☐ Annual Safeguarding declaration completed
- ☐ Policy and Safer Working Practices read and signed
- ☐ Individual recorded on the SCR before contact with children
- ☐ Approved by HR and the school

Intern or Student Teacher**Single Central Record Category: Temporary Staff****Responsible: HR****1. Non-Employee contracted by school to work with students**

Examples: Interns and Student Teachers

- ☐ University or placement letter obtained
- ☐ Identity and right to work verified
- ☐ Verify Address so that personnel is traceable
- ☐ Required background check completed
- ☐ Three safeguarding references normally obtained and verified
- ☐ Verbal reference completed
- ☐ Any reference shortfall risk-assessed and approved
- ☐ Safeguarding and Child Protection Policy and Safer Working Practices read and signed
- ☐ Annual Safeguarding declaration completed
- ☐ Individual recorded on the SCR before placement
- ☐ Approved by HR and the school

Regular Vendor Employee Single Central Record Category: Agency Responsible: Business Services; Campus Administration/HR to verify	
1. Regular Vendor Personnel	Examples: cleaners, security personnel, canteen operators, bookstore or uniform-shop staff.
☐ Contract contains XCL safeguarding clauses ☐ Vendor confirms that required background checks have been completed ☐ Identity verified by XCL ☐ Right to work verified by XCL ☐ Annual safeguarding training completed ☐ Annual declaration and Safer Working Practices read and signed ☐ Individual recorded on the relevant SCR category ☐ Vendor assurance and personnel list reviewed every 45 days	

Temporary One-Day Site Access Single Central Record Category: Not Required Responsible: Business Services and the event/site supervisor	
1. Temporary Vendor Personnel	Examples: event or Sports Day vendors, canteen-event personnel and a one-day replacement cleaner.
☐ Identity checked ☐ Purpose, location and duration of visit recorded ☐ Responsible school supervisor identified ☐ Short-Term Safeguarding Declaration signed ☐ Access restrictions and emergency arrangements explained ☐ Individual appropriately supervised ☐ No direct responsibility for children ☐ Business Services records the visit ☐ Vendor instructed to notify Business Services if attendance extends beyond one day If the individual will attend for more than one day, they must complete the standard vendor personnel process before further access is permitted.	

Appendix 3: Roles and Responsibilities

Effective safer recruitment requires clear accountability across Human Resources, Business Services, school leadership and safeguarding teams.

Responsibilities vary according to whether the adult is an employee, works directly with children, is regular vendor personnel or has temporary site access.

1. Human Resources Business Partner (HRBP)

Key role: Responsible for employee recruitment compliance, recruitment records, background checks and maintenance of the Single Central Record (SCR).

Key responsibilities:

- Ensure job advertisements, job descriptions and application materials reflect XCL's safeguarding commitment.
- Require candidates to complete the XCL Employment Application Form and safeguarding self-declaration; a CV must not replace the application form.
- Review employment history, gaps, discrepancies, previous names and changes of identity.
- Verify identity, qualifications and relevant professional registrations.
- Identify the immigration permission required and verify legal authorisation before employment begins.
- Arrange and review the required background checks, including Verity, ICPC and Certificates of Good Conduct, as applicable.
- Obtain and independently verify three professional references, including the current or most recent employer.
- Ensure at least one safeguarding-specific reference is verified through a live telephone or video conversation.
- Ensure referees are professionally appropriate and contacted through independently verified organisational details.
- Coordinate Principal-to-Principal references for academic appointments.
- Ensure recruitment panels include appropriately trained members.
- Provide structured interview documentation and mandatory safeguarding questions.
- Retain completed applications, interview records, references, verification notes, decisions and risk assessments securely.
- Record recruitment decisions and any approved exceptions or restrictions.
- Create and maintain accurate SCR records.
- Ensure nobody begins unsupervised work with children until the required clearance has been confirmed.
- Escalate discrepancies, disclosures or suitability concerns promptly.
- Retain safeguarding risk assessments and evidence of the required approvals.
- Work with Business Services to verify SCR information for non-employees working directly with children.

2. Hiring Manager

Key role: Leads the selection process and assesses the candidate's suitability for the role and for work with children.

Key responsibilities:

- Review the application form and identify gaps, inconsistencies or areas requiring further exploration.

- Confirm with HR that the required documentation has been received.
- Ensure the interview panel meets XCL's safer recruitment requirements.
- Ask the mandatory safeguarding and role-appropriate scenario questions.
- Maintain professional curiosity and explore unclear, inconsistent or concerning information.
- Record the candidate's safeguarding responses and the evidence considered.
- Complete and submit interview and appointment records to HR.
- Escalate safeguarding, conduct, reference or suitability concerns immediately.
- Confirm that HR clearance has been received before allowing unsupervised contact with children.

3. Principal / Head of School

Key role: Accountable for safer recruitment practice and appointment decisions at school level.

Key responsibilities:

- Ensure safer recruitment requirements are consistently implemented across the school.
- Participate in or arrange Principal-to-Principal references for academic appointments.
- Ensure recruitment decisions are evidence-based and appropriately documented.
- Review and authorise safeguarding risk assessments within the limits of this policy.
- Jointly approve exceptional appointments with the Central HR Team.
- Ensure any restrictions, supervision arrangements and review dates are implemented.
- Ensure the school's SCR is maintained and quality-assured as required.
- Ensure safeguarding induction is completed before unsupervised work begins.
- Promote a culture of professional curiosity and challenge throughout recruitment and onboarding.

4. Designated Safeguarding Lead (DSL)

Key role: Provides safeguarding advice where recruitment information raises concerns about conduct, suitability or risk to children.

Key responsibilities:

- Advise HR and the Principal when a disclosure, reference, interview response, background check or other information raises a safeguarding concern.
- Contribute to safeguarding risk assessments and decisions about appropriate control measures.
- Complete or support safeguarding-specific verbal reference conversations when requested.
- Contact previous-school DSLs where required for adults working directly with children.
- Advise on safeguarding declarations, professional boundaries and Safer Working Practices.
- Oversee or assure safeguarding induction before an adult begins unsupervised work with children.
- Support the annual safeguarding declaration and refresher-training process.

- Quality-assure the SCR monthly or ensure this is completed by another appropriately trained senior leader delegated by the Principal.
- Escalate unresolved omissions or concerns that may affect an adult's access to children.

The DSL does not replace HR's responsibility for recruitment checks, employment decisions or SCR maintenance.

5. Business Services

Key role: Responsible for the safeguarding assurance, access arrangements and records relating to vendors, contractors and temporary site personnel.

Key responsibilities:

- Ensure vendor contracts contain appropriate safeguarding requirements.
- Obtain the vendor's safeguarding declaration and assurance that required background checks have been completed.
- Maintain an up-to-date list of vendor personnel assigned to each campus.
- Ensure relevant vendor personnel are recorded in the correct SCR category.
- Coordinate with HR to verify the identity and legal right to work of vendor personnel.
- Ensure regular vendor personnel complete the required safeguarding induction, training and Safer Working Practices declaration.
- Review vendor safeguarding assurance and personnel information every 45 days.
- Conduct proportionate spot checks of personnel, identification, documentation and safeguarding awareness.
- Ensure vendors report new or replacement personnel before deployment.
- Maintain records of temporary site access.
- Ensure one-day personnel sign the Short-Term Safeguarding Declaration and have appropriate access and supervision arrangements.
- Escalate missing documentation, unauthorised personnel or safeguarding concerns to HR, the DSL and school leadership.

6. School Supervisor / Event Organiser

Key role: Responsible for the day-to-day oversight of temporary vendors, contractors and other adults granted limited site access.

Key responsibilities:

- Confirm the purpose, location and duration of the visit.
- Verify that Business Services has approved the person's access.
- Provide the required site safeguarding and emergency briefing.
- Explain restricted areas, identification requirements and reporting arrangements.
- Ensure agreed supervision arrangements are maintained.
- Prevent temporary personnel from assuming responsibility for or being left alone with children.
- Inform Business Services if the person's attendance will extend beyond one day.
- Report any conduct or safeguarding concern immediately.

7. Vendor Manager / External Provider

Key role: Responsible for the suitability and conduct of personnel supplied to XCL campuses.

Key responsibilities:

- Recruit personnel safely and complete the background checks required by the contract.
- Retain background-check evidence securely and provide evidence to XCL when requested.
- Provide accurate and current details of all personnel assigned to XCL.
- Notify Business Services before deploying any new or replacement worker.
- Ensure personnel complete required XCL safeguarding training, declarations and induction.
- Ensure personnel comply with XCL's Code of Conduct, Safer Working Practices and site-access requirements.
- Notify XCL promptly of any information that may affect a worker's suitability.
- Remove immediately any person whom XCL has not approved or who presents a safeguarding or conduct concern.
- Participate in XCL's 45-day assurance and spot-check processes.

8. Marketing and Communications

Key role: Ensures that XCL's safeguarding commitment is communicated consistently through recruitment materials and public information.

Key responsibilities:

- Publish and maintain approved safeguarding and safer recruitment statements on relevant websites.
- Ensure recruitment campaigns and materials reflect XCL's safeguarding culture.
- Use only wording and documents approved by HR and safeguarding leaders.
- Remove or update outdated versions promptly.
- Maintain consistency across school and group communications.

9. XCL Malaysia Central Office

Key role: Provides country-level oversight, quality assurance and support.

Key responsibilities:

- Monitor implementation of the Safer Recruitment Policy across campuses.
- Audit recruitment files, SCR records and vendor-assurance arrangements.
- Provide advice on complex appointments and safeguarding risk assessments.
- Support consistent policy interpretation and implementation.
- Identify recurring weaknesses and coordinate corrective action.
- Report significant risks and non-identifiable trends to the appropriate country and group leaders.

Appendix 4: Single Central Record Matrix

•	XCL obtains and verifies	▲	Third party obtains; XCL verifies assurance	–	Not normally required
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Application notes

References	Three satisfactory professional references are normally required for employees and direct-access non-employees. If three cannot reasonably be obtained, at least two should normally be secured, with alternative verification, a written risk assessment and the required senior approval.
Previous-school checks	For direct-access non-employees who list previous schools, the DSL of each relevant previous school must be contacted about safeguarding, adult-conduct and suitability concerns. Procurement may ask the XCL DSL to undertake the call.
Overseas checks	ICPC, COGC or another police-clearance certificate is determined by relevant residence, work and education history and eligibility—not nationality alone.
Role-specific evidence	Examples include swimming-teaching/coaching qualifications, lifeguard and first-aid certification, therapist registration or license, and a university placement letter for interns or student teachers.
Temporary access	One-off visitors and temporary contractors are recorded through the visitor/event access process rather than as individual SCR records, provided they remain supervised, stay within approved areas and are never left alone with children. During events, vendors (for example: milo truck) should provide NRIC verified document and sign a Short term vendor safeguarding declaration.
Sensitive records	The SCR records completion, status, outcome, checker and the location of supporting evidence. If a reference or other document contains highly confidential information, the SCR may note that it was reviewed and where the restricted record is held; sensitive details should not be reproduced unnecessarily.

Responsibility Codes: **HR** – Human Resources - **BS** – Business Services

Table 1 : Recruitment, identity, references and screening

●	XCL obtains and verifies	▲	Third party obtains; XCL verifies assurance				—	Not normally required		
SCR role category / example	Application / profile and full history	Address / contact details	Identity: NRIC / passport	Immigration / legal right to work	Qualification/ professional registration	Background screening	Overseas police / ICPC / COGC	Three professional references	Three safeguarding only references	Safeguarding verbal reference
Malaysian employees	●	●	●	●	●	●	●*	●	—	●
Expatriate employees	●	●	●	●	●	●	●	●	—	●
Employees with Expiring Professional Credentials (Lifeguard, Nurse, Counsellor)	●	●	●	●	●	●	●	●	—	●
ECA / SPA coaches; sports, arts, robotics and peripatetic teachers; therapists	●	●	●	●	●	●	—	—	●	●
Direct-Access Non-Employees with Expiring Professional Credentials	●	●	●	●	●	●	—	—	●	●
1:1 Learning Aides	●	●	●	●	—	●	—	—	●	●
Interns / student teachers	●	●	●	●	●	●	—	—	●	●
Professionally personnel supposed / supply staff working directly with children	●	●	●	●	●	●	—	—	●	●
Regular vendor personnel Cleaners, security, canteen, bookstore and uniform-supplier personnel	●	●	●	●	—	▲\$	—	—	—	—
Visitors / temporary access One-off event suppliers, delivery teams and short-term contractors	—	—	●	—	—	—	—	—	—	—

Important: For direct-access non-employees, XCL completes the individual background screening. \$ For regular vendor personnel and contractors, the employing organisation completes and retains the underlying screening; XCL spot checks, and verifies the assurance and reviews it every 45 days. *Overseas checks apply according to the person's residence, work and study history and eligibility, not nationality alone. See Appendix 6.

Table 2: Declarations, induction, access and ongoing assurance

SCR role category / example	Safeguarding / criminal-record self-declaration	Annual safeguarding training	Code of Conduct / Safer Working Practices annual declaration	Short-Term Safeguarding Declaration	Role-specific certificates / placement evidence - <i>Must be recorded with expiry dates</i>	Contract safeguarding clauses	45-day vendor assurance review	Monthly School leadership QA	Responsibility
Malaysian employees	●	●	●	—	- First Aid Certificates - Safer Recruitment Training	—	—	●	HR
Expatriate employees	●	●	●	—		—	—	●	HR
Swimming teachers / lifeguards / Counsellors / Nurses / psychologists employed by XCL (Staff)	●	●	●	—	- First Aid Certificates - Lifeguard Certificate - Counsellor / Health Professional License	—	—	●	HR
ECA / SPA coaches; sports, arts, robotics and peripatetic teachers; visiting therapists working unsupervised with children. Swimming instructors / lifeguards supplied externally must provide qualifications. (Contractor)	●	●	●	—	- Counsellor / Health Professional Registration - First Aid Certificates - Lifeguard Certificate	●	—	●	BS
1:1 Learning Aides	●	●	●	—	—	—	—	●	HR
Interns / student teachers (Temporary Staff)	●	●	●	—	●	—	—	●	HR
Professionally personnel supposed / supply staff working directly with children (Contractor)	●	●	●	—	—	●	●	●	HR
Regular vendor personnel Cleaners, security, canteen, bookstore and uniform-supplier personnel (Agency)	●	●	●	—	—	●	●	●	BS
Visitors / temporary access One-off event suppliers, delivery teams and short-term contractors	—	—	—	●	—	—	—	—	BS

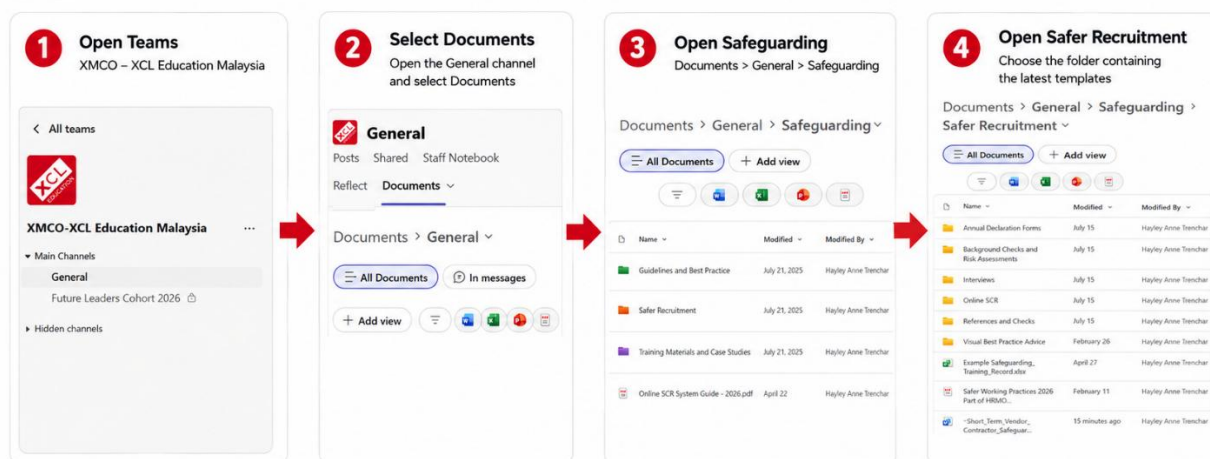
Temporary Site Access: This applies to adults attending for one day only, such as event vendors or a temporary cleaner. Their ID must be checked, they must sign the Short-Term Safeguarding Declaration, remain appropriately supervised and have no direct responsibility for children. Event organizers must ensure records are shared and Business Services must record the visit. They do not need to appear on SCR.

Appendix 5: Available Resources:

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.



How to access the safer recruitment templates



Always use the live versions in Teams. Do not save local copies.

Some examples of templates include:

- **Employment 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.
- **Telephone Verification 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. It is therefore advised not to download local copies, but to use the most up-to-date versions within XCL Education Malaysia TEAMS folder. These documents are saved centrally and available to all employees of XCL Education Malaysia.

Appendix 6: Contextual Application in Malaysia:

XCL Education Malaysia has considered relevant international safer recruitment standards when developing this policy. This appendix explains where specific decisions have been made to achieve equivalent safeguarding assurance within Malaysia's legal, administrative and employment context.

These contextual adaptations do not lower safeguarding standards. All requirements must be applied alongside the current **XCL Malaysia SCR Operational Handbook** and [SCR Matrix](#).

1. Identity and Name Verification

International practice requires an applicant's identity and complete name history to be established. For Malaysian citizens, the National Registration Identity Card (NRIC or IC) provides the principal means of verification.

XCL Education Malaysia has therefore determined that:

- The original IC must be sighted and verified.
- All current and previous names must be declared.
- A birth certificate is not routinely required where identity and name history are satisfactorily established.
- Additional evidence, such as a birth certificate, marriage certificate or name-change document, must be obtained where names or personal information differ across records.

For expatriate applicants, the original passport and relevant immigration documentation must be verified, and all previous names and nationalities declared.

2. Address Verification and History

Malaysian checks ordinarily rely on IC or passport numbers rather than residential address history.

XCL Education Malaysia has therefore determined that:

- A ten-year address history is not routinely required from Malaysian applicants who have lived, studied and worked exclusively in Malaysia.
- Applicants who have lived, studied or worked outside Malaysia during the previous ten years must provide the information required to complete relevant international checks.
- All applicants must provide a complete employment and education history, with gaps explained.
- Where the address on the Employment Application Form differs from the IC, current proof of address must be provided in the applicant's own name and meet the requirements of the SCR Guide.

3. Background Checks

Checks must reflect the applicant's nationality, history, role and access to children.

The SCR Guide and SCR Matrix determine the checks required, which may include:

- Verity background screening.
- Checks using IC or passport details.
- An International Child Protection Certificate for eligible applicants.
- A Certificate of Good Conduct, police clearance or equivalent from relevant countries.
- Additional checks where required by the individual's history or role.

Where a required check is unavailable or unavoidably delayed, the formal risk-assessment and approval process must be followed. Operational urgency is not sufficient justification for reducing requirements.

4. Reference Verification

International practice requires references to be obtained from appropriate professional sources, independently verified and scrutinised for safeguarding information. Within the Malaysian context, references may be requested following a conditional offer. However, all required references must be received, verified and assessed as satisfactory before work begins, unless an exception is expressly authorised.

XCL Education Malaysia requires:

- A minimum of three appropriate professional references.
- A reference from the current or most recent employer.
- For academic appointments, a reference from the most recent Principal or equivalent senior leader.
- At least one independently verified safeguarding-specific reference.
- At least one live telephone or video verification.
- Independently confirmed referee contact details.
- Principal-to-Principal and, where required, DSL-to-DSL contact for relevant roles.
- Comparison of references with the application, employment history and interview evidence.
- Investigation and recording of omissions, inconsistencies or vague responses.

XCL recognises that some schools, particularly in Singapore and other international contexts, routinely provide only factual HR references or decline Principal reference requests. Such a refusal must not automatically be treated as an adverse indication.

Where there is reasonable evidence that this reflects school policy rather than a concern about the candidate:

- The attempts made and the school's response must be recorded.
- The school's usual practice should be independently confirmed wherever possible.
- Alternative assurance must be sought from an appropriately senior, professionally verified person with sufficient knowledge of the candidate.
- The alternative evidence and reasons for accepting it must be documented.

Where the refusal cannot be established as routine policy, or appears specific to the candidate, it must be treated as a potential concern and explored fully.

Any allowance relates only to the source or format of the reference. It does not remove the requirement for satisfactory assurance about the candidate's employment, conduct and suitability to work with children.

5. Educational Qualifications

International practice requires verification that an applicant holds the qualifications claimed.

XCL Education Malaysia has determined that:

- Only the formal certificate issued by the awarding institution will be accepted as evidence that a degree or qualification was awarded.
- A transcript is supporting evidence only and cannot replace the formal certificate.
- The original certificate, or an authorised and securely verifiable digital certificate, must be sighted wherever possible.
- The name on the certificate must correspond with the applicant's verified name history.
- Discrepancies must be resolved and direct verification undertaken where authenticity cannot otherwise be established.

This ensures that XCL verifies the formal award of a qualification rather than relying only on evidence of study.

6. Professional and Safety-Critical Credentials

Roles requiring professional registration, licensing or safety certification need additional assurance.

Where applicable, XCL must verify:

- Registration and practising credentials for nurses, counsellors and therapists.
- Lifeguarding and swimming-teaching qualifications.
- First-aid, CPR and emergency-response certificates.
- Teaching, coaching and other role-specific qualifications or licences.

The credential, issuing organisation, verification details, expiry date and status must be recorded on the SCR. An individual must not undertake duties requiring an expired, missing or unverified credential.

7. Certification, Attestation and Immigration

Documents do not routinely require notarisation or certification as true copies solely for XCL's internal safer recruitment process where the original has been sighted and verification recorded.

However:

- Copies retained must record who sighted the original and the verification date.
- Certification, legalisation or attestation is required where stipulated by immigration, government or another applicable authority.
- XCL may request independently certified evidence where authenticity is uncertain.
- Immigration compliance does not replace safeguarding and suitability checks.

8. Safeguarding Interviews

Candidates may have limited familiarity with UK safeguarding terminology or formal reporting systems. XCL has therefore contextualised its interview questions while retaining the same assessment of suitability.

- All candidates must be asked the required safeguarding questions.
- Structured prompts and an agreed assessment rubric must be used.
- Assessment must consider judgement, professional boundaries, willingness to report and ability to prioritise children's welfare.
- Limited knowledge of UK terminology may indicate a training need; it must not automatically disqualify a candidate.
- Unsafe judgement, poor boundaries, minimisation or reluctance to report must be treated seriously.
- Responses and the panel's assessment must be recorded.

9. Professional Curiosity and Determination

Local variation in systems and documentation does not justify accepting unclear or incomplete information.

Recruitment staff must:

- Follow up information that is missing, vague or inconsistent.
- Consider the combined evidence rather than viewing each check in isolation.
- Seek alternative evidence where standard documentation is unavailable.
- Escalate concerns and record the basis for decisions.
- Maintain the mindset that **"it could happen here"**.

An uneasy feeling is not evidence by itself, but objective inconsistencies, behaviour or unexplained gaps must prompt further enquiry.

10. Principle of Equivalent Assurance

Contextualisation enables international safer recruitment principles to operate effectively in Malaysia; it must never result in fewer or weaker checks.

Every Malaysian and expatriate applicant remains subject to:

- Verified identity, current address and name history.
- Scrutiny of employment and education history.
- Role-appropriate background screening.
- Independently verified professional references.
- Verification of formal certificates and relevant professional credentials.
- A safeguarding declaration.
- Structured assessment of suitability to work with children.
- Recording and quality assurance through the SCR process.

Where the usual evidence cannot be obtained, proportionate alternative assurance must be sought and documented. Any remaining safeguarding gap must follow the formal risk-assessment and approval process.