حكومة دبي
GOVERNMENT OF DUBAI

DUBAI
Knowledge المعرفة

Safer Recruitment Policy Template



Safe Space implementation resource

Field	Details
Resource title	Safer Recruitment Policy Template
Resource type	Policy template
Policy Framework section	4.3 Safer Recruitment and Suitability of Staff, with links to 4.2 Training, 4.4 Professional Conduct and Safe Working Practice, 5.3.4 Reporting allegations against staff and 6.1 Monitoring
Relevant MUST directives	Section 4 Enabling Mechanisms for Safeguarding (Directives 82 to 178) Section 5 Safeguarding Processes for Managing Concerns (Directives 179 to 260) Section 6 Safeguarding Rigour (Directives 261 to 297)
Version	1.0
Review	Reviewed annually, and sooner following changes to United Arab Emirates (UAE) legislation or the Knowledge and Human Development Authority (KHDA) Policy Framework.

This document aligns with the KHDA Policy Framework for Safeguarding and Learner Protection in Dubai's Private Educational Institutions (2026).

Source, basis and scope

This template supports institutions in establishing a regulatory-aligned safer recruitment policy covering appointment, vetting, single auditable records, ongoing suitability, and action when adult suitability concerns arise. This resource supports implementation of the KHDA Policy Framework MUST directives, and should not be used to reduce or replace any requirement in the Framework.[1]

The content is written for all KHDA-permitted private educational institutions unless a sector adaptation box states otherwise. Institutions must adapt role names, contact details and operational arrangements to their approved structure without weakening the safeguarding standard.

This document must be read alongside the KHDA Policy Framework for Safeguarding and Learner Protection, applicable KHDA safeguarding guidance, and the KHDA Technical Guide for Appointing Teaching Staff in Private Schools in Dubai.

The KHDA Technical Guide for Appointing Teaching Staff in Private Schools in Dubai, 2025, emphasises that the school owner must conduct thorough background checks on candidates, verify their qualifications and classroom experience, and also implement a rigorous interview process. These measures help ensure that potential hires meet professional standards and uphold the required code of conduct.

Required implementation standard

- Safer recruitment practices must apply to all adults with access to learners in physical and online environments, including employees, contractors, volunteers, governors, and third-party personnel, regardless of whether they are employed directly by the institution or engaged through a third party. Using third-party personnel does not transfer or reduce the institution's safeguarding, safer recruitment, and suitability oversight responsibilities.
- Recruitment must be transparent and documented, including advertising, shortlisting, structured interviews, verified references and recorded decision-making.
- At least one person on every recruitment panel must have recognised safer recruitment training completed within the last two years.
- All candidates must complete comprehensive and satisfactory pre-employment vetting before appointment, including identity, right to work, reference verification and criminal records clearance, including the UAE Good Conduct Certificate where appropriate.
- All recruitment checks and suitability decisions must be recorded in a single, auditable database and retained for compliance, review and audit purposes.
- Concerns about adult suitability must lead to proportionate action in line with safeguarding, allegations, human resources (HR), disciplinary and regulatory procedures.

[1] KHDA, Policy Framework for Safeguarding and Learner Protection in Dubai's Private Educational Institutions (2026).

Institution-ready suggested policy template:

1. Policy statement

[Institution name] is committed to recruiting, appointing and retaining adults who are suitable to work with or around learners. Safer recruitment is part of the institution's safeguarding system and applies before appointment, during induction and throughout employment or engagement.

2. Scope

- This policy applies to employees, leaders, governors, owners where they have access to learners, contractors, volunteers, interns, third-party staff, visiting specialists, online tutors and any adult working in, for, or on behalf of the institution.
- This policy applies to adults who have physical access to learners and adults who may interact with learners through digital platforms, remote teaching, transport, off-site provision, boarding, internships, work placements or extracurricular activities.

3. Safer Recruitment process

Stage	Required action	Evidence to retain
Workforce planning	Define the role, learner contact level, safeguarding responsibilities, required qualifications and suitability requirements before advertising.	Approved job description, person specification, safeguarding role risk assessment.
Advertising	Include the institution's safeguarding commitment and make it clear that appointments are subject to satisfactory checks.	Advertisement, recruitment pack, safeguarding statement.
Application	Use a standard application process that gathers employment history, qualifications, declarations and gaps requiring follow-up.	Application form, declaration, explanation of gaps. CVs alone are not sufficient.
Shortlisting	Shortlist against published criteria and record decisions. At least one person involved in shortlisting should have safer recruitment training. Identify safeguarding or suitability issues requiring interview follow-up.	Shortlisting matrix, notes on concerns to explore.

Interview	Use a structured interview with safeguarding questions and record responses. Explore gaps in employment history and any inconsistencies identified at shortlisting. Ensure the panel includes a member who has had safer recruitment training.	Interview questions, scoring, panel attendance and training evidence.
References	Verify references by telephone or other documented means before appointment and follow up unclear, incomplete or concerning information.	Reference requests and responses, verification call record log, follow-up notes.
Pre-employment checks	Complete identity, right-to-work, qualifications, role suitability, and criminal record clearance checks, including the UAE Good Conduct Certificate where appropriate, and any other KHDA or legal appointment requirements. Where the candidate has lived or worked outside the UAE, complete international criminal record checks (a home country police clearance certificate, or an Interpol check where available) before appointment. Where such a check cannot be obtained, the institution must document the reason and the risk management action taken.	Single auditable database entry, listing all checks completed, physical evidence provided, name of the person who performed the checks and when, approval to appoint.
Appointment decision	Confirm that all checks are satisfactory before appointment and before any unsupervised access to learners. Any offer made before checks are complete must be conditional on their satisfactory completion.	Appointment approval, check completion sign-off, offer letter conditions.
Induction	Provide safeguarding induction before duties commence, including responsibilities coming under the policy framework, the Code of Conduct, safe working practice, reporting routes, whistleblowing and role-specific safeguards.	Induction checklist, training record, signed Code of Conduct.
Ongoing suitability	Monitor conduct and suitability throughout employment or engagement, including concerns, complaints, low-level concerns, allegations, whistleblowing and supervision feedback. Suitability is an ongoing requirement and does not end once recruitment checks have been completed.	Suitability review notes, conduct records, allegation or concern records where applicable.

4. Single auditable recruitment database

The institution must maintain a single auditable database for recruitment and suitability checks. The database should enable leaders, governance and KHDA to review whether required checks have been completed before appointment and whether renewal or follow-up actions are due.

Minimum field	Purpose
Name, role, department, contract date and start date	Identifies the adult and the area of learner contact.
Employment or engagement type	Distinguishes employee, contractor, volunteer, governor, visitor, third-party staff or online provider.
Identity and right to work checks	Confirms identity and legal eligibility.
Qualification and license checks	Confirms role competence and appointment eligibility where applicable.
Reference checks and verification process	Confirms employment history and suitability information have been verified by telephone or through other documented means.
Criminal records or good conduct clearance	All criminal background checks completed, including the name of the person who checked them and when, and the UAE Good Conduct Certificate where appropriate.
Safer recruitment panel training	Confirms the panel requirement was met.
Safeguarding induction and annual training	Confirms safeguarding training duties are met.
Signed Code of Conduct	Confirms professional conduct acknowledgement.
Social media review	Confirms that the institution has undertaken any lawful and proportionate review of publicly available information relevant to professional suitability and safeguarding risk.
Suitability concerns and restrictions	Records whether any safeguarding, conduct or suitability action is pending or complete.

5. Third-party providers and contractors

The institution retains accountability for safeguarding when third-party staff or contractors work with or around learners. Using third-party providers or contractors does not transfer or reduce the institution's responsibility for safeguarding, safer recruitment, suitability oversight, or learner protection. Contracts and service agreements must require safeguarding standards, safer recruitment and suitability checks consistent with the policy framework and the relevant frameworks, guidelines and protocols adopted in the Emirate of Dubai.

Where agency, supply or outsourced staff are engaged, the institution must obtain written confirmation from the agency or provider that each individual has been subject to checks equivalent in standard to the institution's own vetting requirements before being permitted unsupervised access to learners. The institution may not rely on an agency's assurances alone; it must obtain and retain evidence of the checks performed in the single auditable database.

6. Concerns about adult suitability

- Any concern about an adult's suitability must be reported without delay through safeguarding, allegations, whistleblowing or HR procedures, according to the concern type and reporting route.
- The institution must take proportionate interim safeguarding action where necessary to protect learners. At the same time, concerns are assessed or investigated, including temporary changes to duties, supervision arrangements, restrictions on learner contact or suspension without prejudice in line with applicable HR processes.
- Recruitment or suitability concerns must be reviewed by the appropriate senior leader in consultation with the CPC/DSL, while maintaining separation between safeguarding assessment and HR process where required.

Step-by-step implementation guidance for institutions

1. Approve the Safer Recruitment policy through leadership and governance.
2. Map all adults with access to learners, including temporary, third-party, online and off-site roles.
3. Confirm which recruitment checks apply to each role and where KHDA or legal appointment requirements apply.
4. Ensure every recruitment panel includes at least one member trained in Safer Recruitment practices.
5. Set up or audit the single auditable recruitment database.
6. Prohibit staff from unsupervised learner access until required checks and safeguarding induction are complete.
7. Review third-party contracts to confirm safeguarding and Safer Recruitment expectations are met fully and are aligned with the policy framework.
8. Report termly Safer Recruitment compliance to leadership and governance.
9. Require a minimum of two satisfactory references before any appointment is confirmed, with at least one reference from the most recent employer. Verify references by telephone or other documented means, and follow up on and record any gaps, inconsistencies, or conduct concerns before appointment.
10. Conduct an annual audit of all vetting and suitability records in the single auditable database. The audit must confirm that all records are current, that renewals and re-checks due within the next 12 months are identified and scheduled, and that no adult without satisfactory checks has unsupervised access to learners. The outcomes of the annual audit must be reported to governance.

Sector adaptation box

Sector	Adaptation required
Early childhood centres	Apply Safer Recruitment to all adults with access to children, including care, cleaning, transport, clinic, enrichment and third-party staff. Younger children require heightened vigilance because they may be less able to disclose concerns and may require regular intimate care.
Schools	Align with KHDA school staffing and teacher appointment requirements, including teaching role checks, safeguarding induction and annual Code of Conduct acknowledgement.
Higher education institutions	Apply safeguarding suitability standards to adults working with learners aged 21 and under, including placements, internships, residences, clubs, online platforms and third-party services.
Training and vocational institutes	Apply checks to instructors, assessors, workplace mentors, transport and employer placement contacts where learners aged 21 and under are involved.

Roles and responsibilities

Role	Required responsibilities
Board or Governing Body	Approve policy, receive termly assurance on Safer Recruitment compliance and challenge unresolved gaps.
Head of Institution	Ensure Safer Recruitment is implemented, resourced, monitored and aligned with KHDA requirements. Only appoint and retain staff who meet the requirements of the policy and relevant regulation and legislation, including conduct, professional boundaries and good standing expectations.
HR or Recruitment Lead	Manage recruitment checks, maintain the single auditable database, and escalate concerns promptly.
CPC/DSL	Advise on safeguarding suitability, role risk, induction content and action where adult suitability concerns may create learner risk.
Recruitment panel members	Use structured processes, safeguarding questions, objective scoring and documented decision-making.
Line managers	Monitor ongoing conduct and suitability and report concerns promptly.
Third-party providers	Provide evidence that personnel working with learners meet safeguarding and suitability expectations, and cooperate with institutional monitoring, audit, safeguarding enquiries and investigations. Engaging a third-party provider does not transfer or reduce the institution's responsibility for safeguarding, Safer Recruitment, suitability oversight, and learner protection.

What good practice looks like

- The single auditable database is current, complete and reviewed before every appointment is confirmed.
- Safer Recruitment starts with job design and continues through induction, probation, supervision and conduct monitoring.
- Third-party providers are not accepted based on trust. The organisation checks and periodically reviews their safeguarding and recruitment evidence.
- Panel members can explain why a candidate was appointed and how safeguarding concerns were explored.

Common compliance weaknesses or implementation risks

- Adults begin duties or have access to learners before required checks are complete.
- Recruitment files are held separately without a single auditable overview.
- References are accepted without verification or follow-up of unclear information.
- Third-party, governors, and temporary staff are omitted from Safer Recruitment checks.
- Safeguarding induction is delayed until after the adult starts work with learners.
- The single auditable database is not up to date or monitored, and expired or missing documents are not followed up on.

Evidence to retain for audit, inspection or KHDA review

- Approved Safer Recruitment policy and review record.
- Recruitment advertisements, job descriptions and shortlisting records.
- Interview questions, safeguarding responses and panel training evidence.
- Reference checks, verification notes and pre-employment check records.
- Single auditable recruitment database.
- Safeguarding induction records and signed Code of Conduct acknowledgements.
- Third-party provider due diligence records, criminal background checks and contracts.
- Termly Safer Recruitment monitoring reports to leadership and governance.
- Records of periodic suitability reviews, declarations or re-checks, where required.
- Third-party assurances, monitoring records and corrective actions relating to safeguarding or suitability concerns.

Suggested review frequency

Review annually, and sooner following KHDA or legal updates, recruitment audit findings, adult suitability concerns, allegations, changes to third-party provision, or governance direction.

Minimum compliance self-check

Question	Evidence expected
Do Safer Recruitment practices apply to every adult with access to learners?	Role mapping, policy scope, and provider register.
Is at least one person trained in Safer Recruitment practices on every panel?	Panel records and training registers.
Are checks completed before appointment or unsupervised access?	Single auditable database and appointment sign-off.
Are third-party adults included in due diligence?	Contracts, provider checks, and monitoring records.
Are suitability concerns escalated and acted upon?	Concern records, actions, restrictions, and case outcomes.

References

KHDA. Policy Framework for Safeguarding and Learner Protection in Dubai's Private Educational Institutions, 2026. Knowledge and Human Development Authority, Dubai.

Federal Law No. (3) of 2016 on Child Rights Law, Wadeema. UAE Legislation Portal. https://uaelegislation.gov.ae/en/legislations/1176

Cabinet Resolution No. (52) of 2018 concerning the Executive Regulations of Federal Law No. (3) of 2016 on Child Rights Law, Wadeema. UAE Legislation Portal. https://uaelegislation.gov.ae/en/legislations/1177

National Child Protection Policy in Educational Institutions in the UAE, 2019. UAE Legislation Portal. https://uaelegislation.gov.ae/en/policy/details/lsy-s-lotny-lhm-y-ltfl-fy-lm-ss-t-ltaalymy

KHDA. Technical Guide for Appointing Teaching Staff in Private Schools in Dubai, 2025, as referenced in the Policy.

Administrative Resolution No. (54) of 2025 concerning appointment requirements for private school staff in Dubai, as listed in the Policy Appendix C.

NSPCC Learning. Safer recruitment, updated 2 April 2026. https://learning.nspcc.org.uk/safeguarding-child-protection/safer-recruitment