

Safeguarding and Foreign Nationals – Risk Assessment Form Template and Guidance

Notes

Safeguarding and UK Citizens who have lived or worked overseas.

The following guidance outlines Hertfordshire County Council's procedure when recruiting either UK citizens who have lived overseas or recruiting non UK citizens into a post that requires an enhanced DBS disclosure. This document should be read in conjunction with the Safe Staffing (DBS (Disclosure and Barring Service)) Policy and Procedure. The subsequent risk assessment form on page 2 must be completed by a manager with knowledge of the role and service, ensuring that the appropriate safeguards are in place.

The Disclosure and Barring Service cannot currently access criminal records held overseas, therefore a DBS check may not provide a complete picture of an individual's criminal record. It is considered good practice to obtain a certificate of good conduct from the embassy of the country the applicant has specified they have spent a significant period of time in.

As stipulated within the Safe Staffing (DBS (Disclosure and Barring Service)) Policy and Procedure this is part of an applicant's pre-employment checks please note that a DBS and all other recruitment checks must be sought taking extra care with references and other background checks.

Limitations of Certificate of Good Conduct/Letter of Good repute

Managers and heads should note that the information provided on certificates of good conduct / letters of good repute can be subjective due to the following reasons;

- Data protection
- Political willingness e.g. Countries with political unrest are unlikely to provide information.
- Culture e.g. age of consent in a number of EU countries is less than 16.
- Each country may provide different information, and in some cases, will not provide any information. For details of what each country is able to provide, please refer to the [CPNI Website](#).

Obtaining a Certificate of good conduct/good repute

The **applicant** is responsible for requesting a 'Certificate of Good Repute/Letter of Good Conduct' from the home embassy of that country which can authenticate the document. It also reduces the need and cost for potential translation requirements. Costs for the certificate/letter can vary according to the country and the applicant must cover this charge.

Applicants must provide a certificate of good repute / letter of good conduct from a country that is able to provide one. If this is not obtained, they must provide evidence that an attempt was made to obtain a certificate / letter.

Useful Contacts/Links

Foreign and Commonwealth website www.fco.gov.uk or telephone 020 7008 1500

[CPNI – Centre for the protection of National Infrastructure](#) -

[Safeguarding Children and Safer Recruitment in Education document](#)

NCSL safeguarding training which can be found at www.ncsl.org.uk

Herts HR – Safe Staffing Team – 01992 555692

Risk Assessment Template- Overseas Certificate of Good Repute/ Letter of Good Conduct

What is this assessment for?

If an applicant has lived or worked overseas within the last five years for a period 6 months or more, they must seek to obtain a certificate of good reputation/letter of good conduct. If the applicant is unable to provide a certificate of Good Repute / Letter of Good Conduct from the embassy of the country they have spent time in, Line Managers/head teacher should make an assessment of any potential risks.

Who completes it?

The Line Manager/ head teacher must complete this assessment with knowledge of the role and service, ensuring that appropriate safeguards are put in place.

Where do I keep it?

This form should be retained on the personal file of the individual involved.

Risk Assessment

Considerations (tick Yes/No, and add necessary comments)	Yes	No	N/A	Comments
Has the applicant provided evidence that a Cert. good conduct / Letter of Good Repute have been requested?				
If one has not been requested, please state reasons?				
Is the certificate/ letter from a country where it may prove difficult to obtain?				
Have satisfactory employment references been sought and received?				
Have references been validated to ensure accurate? E.g. dates stated match, from a genuine source.				
Have satisfactory other pre-employment checks been completed? E.g. Proof of right to work, health, qualifications etc.				
Has the person completed their DBS application form?				
Have they declared any information				

N.B - Following on from completing this assessment of risks, if the applicant is employed, it is imperative that the employee is provided with an in-depth induction and any relevant professional codes of conduct are issued.

Line Manager / Headteacher's name:

Date:

Outcome: Agreement to continue with offer/withdraw offer (if not agreed please give details)