



THE WALSALL FOOTBALL CLUB LIMITED

POLICY TITLE: SAFER RECRUITMENT POLICY

Introduction

The safe recruitment of staff at Walsall Football Club is the first step to safeguarding and promoting the welfare of all children and young people who are involved in activities within the Club. Walsall Football Club is committed to safeguarding and promoting the welfare of all young people in its care. As an employer, the Club expects all staff and volunteers to share this commitment.

Aims and Objectives

The aims of the Safer Recruitment Policy are to help deter, reject or identify people who might abuse children or vulnerable adults or are otherwise unsuited to working with them by having appropriate procedures for appointing staff.

The aims of the Clubs Recruitment Policy are as follows:

- To ensure that the best possible staff are recruited on the basis of their merits, abilities and suitability for the position;
- To ensure that all job applicants are considered equally and consistently;
- To ensure that no job applicant is treated unfairly on any grounds including race, colour, nationality, ethnic or national origin, religion or religious belief, sex or sexual orientation, marital or civil partner status, disability or age;
- To ensure compliance with all relevant legislation, recommendations and guidance;
- To ensure that the Club meets its commitment to safeguarding and promoting the welfare of children, young people and vulnerable adults by carrying out all necessary pre-employment checks.

Employees involved in the recruitment and selection of staff are responsible for familiarising themselves with and complying with the provisions of this policy.

The Club has a principle of open competition in its approach to recruitment and will seek to recruit the best applicant for the job. The recruitment and selection process should ensure the identification of the person best suited to the job at the club based on the applicant's abilities, qualification, experience and merit as measured against the job description and person specification.

The recruitment and selection of staff will be conducted in a professional, timely and responsive manner and in compliance with current employment legislation, and relevant safeguarding legislation and statutory guidance.



If a member of staff involved in the recruitment process has a close personal or familial relationship with an applicant they must declare it as soon as they are aware of the individual's application and avoid any involvement in the recruitment and selection decision-making process.

The Club aims to operate this procedure consistently and thoroughly while obtaining, collating, analysing and evaluating information from and about applicants applying for job vacancies at Walsall FC.

ROLES AND RESPONSIBILITIES

It is the responsibility of the Board to:

- Ensure the Club has effective policies and procedures in place for recruitment of all staff and volunteers in accordance with legal requirements.
- Monitor the Club's compliance with them.

It is the responsibility of the Chief Executive and Managers involved in recruitment to:

- Ensure that the Club operates safe recruitment procedures and makes sure all appropriate checks are carried out on all staff and volunteers who work at the Club.
- Monitor contractors and agencies compliance with this document.
- Promote welfare of children and young people at every stage of the procedure.

The Board has delegated responsibility to the Chief Executive to lead in all appointments. Other staff may be involved in staff appointments but the final decision will rest with the Chief Executive.

Definition of Regulated Activity and Frequency

Any position undertaken at, or on behalf of the Club will amount to "regulated activity" if it is carried out:

- Frequently, meaning once a week or more; or
- Overnight, meaning between 2.00am and 6.00am; or
- Satisfies the "period condition", meaning four times or more in a 30-day period; and
- Provides the opportunity for contact with children

Roles which are carried out on an unpaid / voluntary basis will only amount to regulated activity if, in addition to the above, they are carried out on an unsupervised basis.

The Club is required to carry out an enhanced DBS check for all staff who will be engaging in regulated activity. However, the Club can also carry out an enhanced DBS check on a person who would be carrying



out regulated activity but for the fact that they do not carry out their duties frequently enough i.e. roles which would amount to regulated activity if carried out more frequently.

RECRUITMENT AND SELECTION PROCEDURE

Advertising

To ensure equality of opportunity, the Club will advertise all vacant posts to encourage as wide a field of applicant as possible; normally this entails an external advertisement.

Any advertisement will make clear the Club's commitment to safeguarding and promoting the welfare of children, young people and vulnerable adults.

All documentation relating to applicants will be treated confidentially in accordance with the Data Protection Act (DPA).

Application Forms

Walsall Football Club uses its own application form and all applicants for employment will be required to complete an application form containing questions about their academic and full employment history and their suitability for the role (in addition all applicants are required to account for any gaps or discrepancies in employment history). Incomplete application forms will not be shortlisted.

The application form will include the applicant's declaration regarding convictions and working with children and will make it clear that the post is exempt from the provisions of the Rehabilitation of Offenders Act 1974. CVs will not be accepted.

It is unlawful for the Club to employ anyone who is barred from working with children. It is a criminal offence for any person who is barred from working with children to apply for a position at the Club. All applicants will be made aware that providing false information is an offence and could result in the application being rejected or summary dismissal if the applicant has been selected, and referral to the police and/or the DBS.

Job Descriptions and Person Specifications

A job description is a key document in the recruitment process and must be finalised prior to taking any other steps in the recruitment process. It will clearly and accurately set out the duties and responsibilities of the job role.



The person specification is of equal importance and informs the selection decision. It details the skills, experience, abilities and expertise that are required to do the job. The person specification will include a specific reference to suitability to work with children, in the case of academy or community staff.

References

References for shortlisted applicants will be sent for immediately after short listing. The only exception is where an applicant has indicated on their application form that they do not wish their current employer to be contacted at that stage. In such cases, this reference will be taken up immediately after interview.

All offers of employment will be subject to the receipt of a minimum of two written references which are considered satisfactory by the Club. One of the references must be from the applicant's current or most recent employer. If the current / most recent employment does / did not involve work with children, then the second reference should be from the employer with whom the applicant most recently worked with children. The referee should not be a relative. References will always be sought and obtained directly from the referee and their purpose is to provide objective and factual information to support appointment decisions.

All referees will be asked whether they believe the applicant is suitable for the job for which they have applied and whether they have any reason to believe that the applicant is unsuitable to work with children. Referees will also be asked to confirm that the applicant has not been radicalised so that they do not support terrorism or any form of "extremism".

Please note that no questions will be asked about health or medical fitness prior to any offer of employment being made.

Any discrepancies or anomalies will be followed up.

The Club does not accept open references, testimonials or references from relatives.

Interviews

There will be a face-to-face interview wherever possible, and a minimum of two interviewers will see the applicants for the vacant position. The interview process will explore the applicant's ability to carry out the job description and meet the person specification. It will enable the panel to explore any anomalies or gaps have been identified in order to satisfy themselves that the chosen applicant can meet the safeguarding criteria (in line with Safer Recruitment Training).



Any information in regard to past disciplinary action or allegations, cautions or convictions will be discussed and considered in the circumstance of the individual case during the interview process, if it has not been disclosed on the application form.

At least one member of any interviewing panel will have undertaken Safer Recruitment Training or refresher training as applicable.

All applicants who are invited to an interview will be required to bring evidence of their identity, address and qualifications. Original document will only be accepted and photocopies will be taken. Unsuccessful applicant documents will be destroyed six months after the recruitment programme.

OFFER OF APPOINTMENT AND NEW EMPLOYEE PROCESS

If it is decided to make an offer of employment following the formal interview, any such offer will be conditional on the following:

- The agreement of a mutually acceptable start date and the signing of a contract incorporating the Club's standard terms and conditions of employment;
- Verification of the applicants' identity (where that has not previously been verified);
- The receipt of two references (one of which must be from the applicants most recent employer) which the Club considers to be satisfactory;
- Where the position amounts to "regulated activity the receipt of an enhanced disclosure from the DBS which the Club considers to be satisfactory";
- Where the position amounts to "regulated activity" confirmation that the applicant is not named on the Children's Barred List*;
- Verification of the applicants' medical fitness for the role;
- Verification of the applicants right to work in the UK;
- Any further checks which are necessary as a result of the applicant having lived or worked outside of the UK; and
- Verification of professional qualifications which the Club deems a requirement for the post, or which the applicant otherwise cites in support of their application (where they have not been previously verified).

*The Club is not permitted to check the Children's Barred List unless an individual will be engaging in "regulated activity". The Club is required to carry out an enhanced DBS check for all staff who will be engaging in regulated activity. However, the Club can also carry out an enhanced DBS check on a person



who would be carrying out regulated activity but for the fact that they do not carry out their duties frequently enough i.e. roles which would amount to regulated activity if carried out more frequently.

Whether a position amounts to "regulated activity" must therefore be considered by the Club in order to decide which checks are appropriate. It is however likely that in nearly all cases the Club will be able to carry out an enhanced DBS check and a Children's Barred List check.

A personal file checklist will be used to track and audit paperwork obtained in accordance with Safer Recruitment Training. The checklist will be retained on personal files.

The Rehabilitation of Offenders Act 1974

The Rehabilitation of Offenders Act 1974 does not apply to positions which involve working with or having access to the Club's children and vulnerable adults. Therefore, any convictions and cautions that would normally be considered 'SPENT' **must be** declared when applying for any position.

DBS (Disclosure and Barring Service) Certificate (formerly known as CRB Disclosure)

The Club applies for an enhanced disclosure from the DBS and a check of the Children's Barred List (now known as an Enhanced Check for Regulated Activity) in respect of all positions at the Club which amount to "regulated activity" as defined in the Safeguarding Vulnerable Groups Act 2006 (as amended). The purpose of carrying out an Enhanced Check for Regulated Activity is to identify whether an applicant is barred from working with children by inclusion on the Children's Barred List and to obtain other relevant suitability information.

It is the Clubs policy that the DBS disclosure **must be** obtained before the commencement of employment of **any** new employee who will be involved in any activity with children or young people.

It is the Club's policy to re-check employee's DBS Certificates every three years and in addition any employee that takes leave for more than three months (ie: maternity leave, career break etc) must be re-checked before they return back to work.

DBS checks will still be requested for applicants with recent periods of overseas residence and those with little or no previous UK residence.

Dealing with convictions

The Club operates a formal procedure if a DBS Certificate is returned with details of convictions. Consideration will be given to the Rehabilitation of Offenders Act 1974 and also:



- The nature, seriousness and relevance of the offence;
- How long ago the offence occurred;
- One-off or history of offences;
- Changes in circumstances
- Decriminalisation and remorse.

A formal meeting will take place face-to-face to establish the facts. A decision will be made following this meeting. In the event that relevant information (whether in relation to previous convictions or otherwise) is volunteered by an applicant during the recruitment process or obtained through a disclosure check, the Chief Executive will evaluate all of the risk factors above before a position is offered or confirmed.

If an applicant wishes to dispute any information contained in a disclosure, they may do so by contacting the DBS. In cases where the applicant would otherwise be offered a position were it not for the disputed information, the Club may, where practicable and at its discretion, defer a final decision about the appointment until the applicant has had a reasonable opportunity to challenge the disclosure information.

Proof of identity, Right to Work in the UK & Verification of Qualifications and/or professional status

All applicants invited to attend an interview at the Club will be required to bring their identification documentation such as passport, birth certificate, driving licence etc. with them as proof of identity/eligibility to work in UK in accordance with those set out in the Immigration, Asylum and Nationality Act 2006 and DBS identity checking guidelines. The Club does not discriminate on the grounds of age.

Where an applicant claims to have changed their name by deed poll or any other means (e.g. marriage, adoption, statutory declaration) they will be required to provide documentary evidence of the change.

Overseas checks

Applicants who have lived/travelled abroad for more than 3 months will need to obtain a criminal record check from the relevant country. The applicant will not be permitted to commence work until the overseas information has been received and is considered satisfactory by the Club.

Induction Programme

All new employees will be given an induction programme which will clearly identify the Club policies and procedures. An overview of the Safeguarding Policy and appropriate Safeguarding staff will be identified to all new starters during the induction process.



Single Central Record of Members of Staff

In addition to the various staff records kept in the club and on individual personnel files, a single central record of recruitment and vetting checks is kept.

This is kept up-to-date and retained by EFL. The Single Central Record will contain details of the following:

- All employees who are employed to work at the Club, full and part-time
- All others who have been chosen by the Club to work in regular contact with children, young people and vulnerable adults.

A designated person will be responsible for auditing the Single Central Record.

Record Retention / Data Protection

The Club is legally required to undertake the above pre-employment checks. Therefore, if an applicant is successful in their application, the Club will retain on their personnel file any relevant information provided as part of the application process. This will include copies of documents used to verify identity, right to work in the UK, medical fitness and qualifications. Medical information may be used to help the Club to discharge its obligations as an employer e.g. so that the Club may consider reasonable adjustments if an employee suffers from a disability or to assist with any other workplace issue.

This documentation will be retained by the Club for the duration of the successful applicant's employment with the Club. All information retained on employees is kept centrally and locked in a secure cabinet.

The same policy applies to any suitability information obtained about volunteers involved with Club activities.

Walsall FC (WFC) will retain all interview notes on all unsuccessful applicants for a period of 6 months, after which time the notes will be confidentially destroyed (ie: shredded). The 6-month retention period is in accordance with the Data Protection Act 1998.

Ongoing Employment

WFC recognises that safer recruitment and selection is not just about the start of employment but should be part of a larger policy framework for all staff. The Club will therefore provide ongoing training and support for all staff, as identified through the Annual Review/appraisal procedure. This training will include any changes to Club policies and regular Safeguarding updates.



Leaving Employment at Walsall FC

Despite the best efforts to recruit safely there will be occasions when allegations of serious misconduct or abuse against children and young people are raised. This policy is primarily concerned with the promotion of safer recruitment and details the pre-employment checks that will be undertaken prior to employment being confirmed. Whilst these are pre-employment checks the Club also has a legal duty to make a referral to the DBS in circumstances where an individual:

- Has applied for a position at the Club despite being barred from working with children; or
- Has been removed by the Club from working in regulated activity (whether paid or unpaid), or has resigned prior to being removed, because they have harmed, or pose a risk of harm to, a child.

Contractors and agency staff

Contractors engaged by the Club must complete the same checks for their employees that the Club is required to complete for its staff. The Club requires confirmation that these checks have been completed before employees of the Contractor can commence work at the Club.

The Club will independently verify the identity of staff supplied by contractors or an agency in and will require the provision of the original DBS certificate before contractors or agency staff can commence work at the Club.

Visiting Speakers (and Prevent Duty)

The Prevent Duty Guidance requires the Club to have clear protocols for ensuring that any visiting speakers are suitable and appropriately supervised.

The Club is not permitted to obtain a DBS disclosure or Children's Barred List information on any visiting speaker who does not engage in regulated activity at the School or perform any other regular duties for or on behalf of the Club.

All visiting speakers will be subject to the Club's usual visitors signing in protocol. [Security on Site Policy] This will include signing in and out at Reception, the wearing of a visitors badge at all times and being escorted by a fully vetted member of staff between appointments.

The Club will also obtain such formal or informal background information about a visiting speaker as is reasonable in the circumstances to decide whether to invite and/or permit a speaker to attend the Club. In doing so the Club will always have regard to the [Visitors and Security Policy] and the Prevent Duty Guidance.



In fulfilling its Prevent Duty obligations the Club does not discriminate on the grounds of race, colour, nationality, ethnic or national origin, religion or religious belief, sex or sexual orientation, marital or civil partner status, disability or age.

Volunteers

The Club will request an enhanced DBS disclosure and Children's Barred List information on all volunteers undertaking regulated activity with children/young people at or on behalf of the Club (the definition of regulated activity set out above will be applied to all volunteers).

Under no circumstances will the Club permit an unchecked volunteer to have unsupervised contact with pupils.

Monitoring and Evaluation

The Chief Executive, or designated staff will be responsible for ensuring that this policy is monitored and evaluated throughout the Club. This will be undertaken through formal audits of job vacancies and a yearly Safer Recruitment Evaluation audit.

Document Created	:	28th June 2018	Version	:	3
Document Reviewed	:	23rd February 2021			
Document Approved	:	26th February 2021			
Next Review Date	:	1st March 2022			



Appendix 1

**Disclosure and Barring Service (DBS) Checks - Approved / Not Approved
Risk Assessment Form**

Name: Department:

Date of Start:

Does the applicant have a previous DBS certificate? Yes / No

Level of Certificate? Enhanced / Standard

Certificate Number: Date of Issue of Certificate:

Clearing Organisation Details:

Is the DBS clear of any convictions: Yes / No

Items to Discuss	Risk Identified – this requires a frequency and likelihood scale	Outcomes / Actions
Job Role / Level of contact to learners		
Impact on the business needs delaying start date		
What is the offence?		
What is the candidate's explanation of the circumstances of the offence? Please include date and time of the meeting with candidate, continue on a separate sheet if necessary.		
Did the individual tell the organisation about the offences when they applied for the job and was their information accurate?		
Is the conviction spent? Please seek guidance if unsure.		
How old was the individual at the time?		



How long ago was the most recent offence?		
Did the offence include possession and selling of drugs, burglary or theft or other issues that may carry risk to the organisation?		
Was the offence violent or sexual? If relating to under 18's or vulnerable adult, seek guidance from Director of HR or DSO.		

Signed: Name: Date:

(Person completing form)

Signed: Name: Date:

(Director of HR or DSO)

Outcome	Signature	Date
Approved		
Not Approved		



Guidance Notes for Completion

A risk assessment will only be used in exceptional circumstances, so as not to cause disruption to critical business needs.

Employment prior to obtaining a DBS will only be considered in EXCEPTIONAL circumstances and where the work is NOT REGULATED ACTIVITY.

The Club will only consider DBS certificates if they are less than 12 months old.

The member of staff completing this form must have sight of the original DBS certificate. They must complete the risk assessment outlining any potential risks they can envisage.

The risk assessment form and DBS certificate are forwarded to HR for discussion and consideration with the DSO.

In some circumstances it may be relevant for these forms to be considered by the Senior Safeguarding Manager.

HR will confirm whether approval has/has not been given to use this DBS.

Please be advised all other employment checks must be in place, ie qualifications, references before employment can commence.



Appendix 2

Walsall Football Club Job Application Form				
Title of post applied for:	Closing Date:			
Before completing this form, please read the accompanying guidance notes. Please write clearly in black ink or type.				
Confidential				
1. PERSONAL DETAILS (BLOCK CAPITALS PLEASE)				
Surname:	First Name or Initials:			
Former surnames if different:	Preferred Name or Title (Optional):			
Address:	Telephone Number			
	Email Address			
	Nat. Insurance No:			
Nationality:	If you are not a British passport holder or a European Citizen, or you do not have the permanent right to remain in the UK, you will require a work permit.			
Do you need a work permit to be employed in the UK? <input type="checkbox"/> Yes <input type="checkbox"/> No	If you already have a work permit, when does it expire? (Please note that your current work permit may not be valid for this post.)			
Where did you learn of the post?				
Preferred work arrangements: <input type="checkbox"/> Full-time <input type="checkbox"/> Job share <input type="checkbox"/> Term time only <input type="checkbox"/> 30 hrs a week				
2. EDUCATION AND PROFESSIONAL QUALIFICATIONS RELEVANT TO THE ROLE (Original documents as proof of qualification will be required at interview)				
Secondary School / College / University	Dates From To	Examinations taken	Date	Result
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Professional Qualifications currently held: how obtained, grade and date

Other relevant Educational or Training Courses, with dates

3. PRESENT POST

Title of Post:		Salary:	
Name of Employer:		Business of Employer:	
Address:	Date Commenced:		
	Date Ended (if applicable):		
Town:	Post Code:		
Please outline your responsibilities, to whom you are responsible and staff responsible to you (if applicable):			
Reason for leaving or wishing to leave:			
Period of notice required to terminate present employment:			
Please notify us of any dates you are available for interview:			



4. PREVIOUS EMPLOYMENT

(Please use continuation sheet if necessary.)

Name and Address of Employers	Position held	Reason for leaving	Final salary
Description of duties:			
Description of duties:			
Description of duties:			
Description of duties:			



5. RELEVANT SKILLS, ABILITIES, KNOWLEDGE, EXPERIENCE AND YOUR REASONS FOR APPLYING FOR THIS JOB



6. OTHER INFORMATION

What activities outside work interest you? (State any positions held you consider relevant.)

Do you hold a current driving licence? Yes No Do you have access to a car? Yes No

Disabilities

If selected for interview, do you require any special arrangements to be made on account of a disability? Yes No

If "yes", please give brief details of the effects of your disability on your day-to-day activities, and any other information that you feel would help us to accommodate your needs during your interview and fulfil our obligations under the Equality Act 2010:

Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975

Have you any convictions that are not spent under Rehabilitation of Offenders Act? Yes No

If Yes, please provide further details:

As this post is covered by the Rehabilitation of Offenders Act 1974(Exceptions) Order 1975, both spent and unspent convictions must be declared.



7. REFERENCES

Referee 1		Referee 2	
Title (Mr, Mrs etc):		Title (Mr, Mrs etc):	
Full Name:		Full Name:	
Job Title:		Job Title:	
Organisation:		Organisation:	
Address:		Address:	
Town	Post Code	Town	Post Code
Tel No:		Tel No:	
E-mail address:		E-mail address:	
Please state if we may obtain this reference prior to interview.	<input type="checkbox"/> Yes <input type="checkbox"/> No	Please state if we may obtain this reference prior to interview.	<input type="checkbox"/> Yes <input type="checkbox"/> No

8. DECLARATION

I declare that the information given in this application form is true and complete. I understand that if I have given any misleading information on this form or made any omissions, this will be sufficient grounds for terminating my employment.			
Signature:		Date:	
Name:			
The information provided by you on this form may be processed for purposes permitted by the General Data Protection Regulation. You have, on written request, the right of access to personal data held about you. The company treats personal data collected during the recruitment process in accordance with our Data Protection Policy.			

PLEASE NOTE:

Due to the current COVID-19 restrictions, you may be asked to attend an initial interview online via Zoom. However, any subsequent interview will be face to face with specific social distancing guidelines in place in accordance with the Company protocols.

Only those candidates shortlisted for interview will be contacted. Your details will not be retained on file if you are not short listed for interview in accordance with the Company's GDPR policies.

Applications received after the closing deadline will not be considered.