



BONDED BY BELIEF
SINCE 1878

Recruitment of Ex-Offenders Policy



Metadata

Policy Owner	Human Resources (HR)
Policy Author	HR Department
Effective date	01 September 2026
Review date	September 2027

Policy details

This policy does not form part of any contract with an individual and/or any employee's contract of employment and may be amended by the Club at any time.

- As an organisation assessing applicants' suitability for positions which are included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order using criminal record checks processed through the Disclosure and Barring Service (DBS), West Bromwich Albion Football Club (WBAFC) complies fully with the code of practice and undertakes to treat all applicants for positions fairly.
- WBAFC undertakes not to discriminate unfairly against any subject of a criminal record check on the basis of a conviction or other information revealed.
- WBAFC can only ask an individual to provide details of convictions and cautions that WBAFC are legally entitled to know about. Where a DBS certificate at either standard or enhanced level can legally be requested (where the position is one that is included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 as amended, and where appropriate Police Act Regulations as amended) WBAFC can only ask an individual about convictions and cautions that are not protected.
- WBAFC is committed to the fair treatment of its staff, potential staff or users of its services, regardless of age, sex or sexual orientation, gender reassignment, marital or civil partnership status; disability, pregnancy or maternity, religion and belief, race (which includes colour and ethnic/national origin) and offending background.
- This written policy is made available to all applicable DBS applicants at the start of the recruitment process.
- WBAFC actively promotes equality of opportunity for all with the right mix of talent, skills and potential and welcome applications from a wide range of candidates, including those with criminal records.
- WBAFC select all candidates for interview based on their skills, qualifications and experience.
- A self-declaration form is issued to all new starters after a conditional offer of employment; engagement of services has been made.



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- Completion of a self-declaration form will be required by all staff every season
- An application for a criminal record check is only submitted to the DBS after a thorough risk assessment has indicated that one is both proportionate and relevant to the position concerned. For those positions where a criminal record check is identified as necessary, all application forms, job adverts and recruitment briefs will contain a statement that an application for a DBS certificate will be submitted in the event of the individual being offered the position.
- WBAFC ensures that WBAFC staff involved in the recruitment process that involves DBS checks will be suitably trained to identify and assess the relevance and circumstances of offences. WBAFC also ensures that such persons have received appropriate guidance and training in the relevant legislation relating to the employment of ex-offenders, e.g. the Rehabilitation of Offenders Act 1974.
- At interview, or in a separate discussion, WBAFC ensures that an open and measured discussion takes place on the subject of any offences or other matter that might be relevant to the position. Failure to reveal information that is directly relevant to the position sought could lead to withdrawal of an offer of employment.
- WBAFC makes every subject of a criminal record check submitted to DBS directly by WBAFC aware of the existence of this policy and makes a copy available on request.
- In the event of any disclosures arising from any part of the recruitment process, The Director of HR and/or the Head of Safeguarding & Welfare will meet with and speak to the applicant and seek an explanation from them. WBAFC undertakes to discuss any matter revealed on a DBS certificate with the individual seeking the position before making any decisions on employment including withdrawing any conditional offer of employment. All information gathered will then be considered by the appropriate Safeguarding Case Management Group to ensure that aggravating and mitigating factors relevant to the role and responsibilities of the job applied for are considered by those with appropriate experience and expertise (factors considered will be any pattern of offending, the seriousness of any offence(s), the relevance to the post, how long ago the offence occurred, whether it was a one-off offence or a history of offences and any potentially continuing safeguarding risk). Confidentiality will be strictly maintained at all times.

Monitoring and Evaluation

This policy will be reviewed every 12 months or in line with legislative and business changes.



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Revision History

<u>Version</u>	<u>Date</u>	<u>Comments/reason for amendments</u>	<u>Amended by</u>
September 2021	01.10.22	Updated branding Update of policy author Inclusion of policy monitoring timeline Inclusion of page numbers and review date Greater explanation of process around disclosures on DBS certificate	S. Foxall
01.10.22	01.04.24	Branding Update Revision history moved to the end of the policy	S. Foxall
01.04.24	01.07.25	Branding Update Inclusion of self-declaration form	S. Foxall
01.07.25	01.09.26	Branding Update Inclusion of self dec form to be completed by all staff every season Update to include this policy will be made available to subjects Job title changes	S. Foxall Director of HR