

# Club and Academy Safer Recruitment Policy

Will Cowell  
Head of Safeguarding, Welfare & Education

Blackpool Football Club & Academy

October 2020



## **Aims and vision**

The purpose of this recruitment and selection policy is to ensure the practice of safe and equitable recruitment and deployment of staff and volunteers, ensuring the process is conducted in a fair, effective and economic manner and to ensure those that are responsible for each stage of the recruitment process demonstrate a professional approach by dealing honestly, efficiently and fairly with all internal and external applicants.

The Club and Academy is committed to attracting, selecting and retaining the best possible employees who will successfully and positively contribute to providing a valuable service. A motivated and committed workforce with appropriate knowledge, skills, experience and ability to do the job is critical to the's performance and fundamental to the delivery of a high quality of football development.

The recruitment and selection process will seek to identify the person best suited to the job based on the applicant's abilities, qualifications, experience and merit, measured against a clear job description and person specification for each role.

## **2. Equal opportunities**

The Club and Academy is committed to providing the quality of opportunity for all and to ensuring that all stages of recruitment and selection are consistent, transparent and fair. Recruitment and selection procedures will be reviewed on a regular basis to ensure that applicants are not discriminated against on the grounds of race, nationality, gender, religion, age, disability, marital status or sexual orientation. The Club and Academy will ensure that equal opportunities are promoted in line with its Equality Policy.

### 3. Roles and responsibilities

It is the responsibility of the Academy Director to ensure the Club and Academy has effective policies and procedures in place for recruitment of all staff, contractors, volunteers and agency workers in accordance with legal requirements and guidance. This individual will also monitor compliance.

It is the responsibility of the Academy Director, Designated Safeguarding Officer and others involved in recruitment to ensure that the Club and Academy operates safer recruitment procedures and makes sure all appropriate checks are carried out on all staff, contractors who work at the Club and Academy, agency workers and volunteers before the work or volunteering commences. Responsibilities also include monitoring contractors' and agencies' compliance with this document and ensuring that a focus is maintained upon ensuring a safe and appropriate workforce in the in line with the Club and Academy's commitment to safeguarding and promoting the welfare of children, young people and adults at Risk (See Blackpool Football Club and Academy's Safeguarding children and Safeguarding Adults Policies).

All line managers should be aware that satisfactory enhanced DBS disclosures must be received for all new staff who are taking up Regulated Positions. The Academy Director or Designated Safeguarding Officer may only authorise a new member of staff to start work in exceptional circumstances prior to receipt of a satisfactory DBS disclosure providing that:

- Arrangements are in place to ensure that the individual is supervised at all times <sup>[L]</sup><sub>[SEP]</sub>
- The enhanced DBS disclosure has been applied for before the start date <sup>[L]</sup><sub>[SEP]</sub>
- A satisfactory separate barred list check has been completed <sup>[L]</sup><sub>[SEP]</sub>
- All other checks (including references) have been completed <sup>[L]</sup><sub>[SEP]</sub>

## **4. Advertising and the initial process of recruiting**

### **4.1. Advertising**

The following procedures and practices are in place to ensure the safe recruitment of staff and to ensure equality of opportunity. The Club and Academy will generally advertise vacant posts to encourage as wide a field of applicants as possible. Normally this entails internal and external advertisement in relevant publications or websites, including the Club and Academy's own website. Any advertisement will include a clear statement of the Club and Academy's commitment to safeguarding and promoting the welfare of children.

### **4.2. Job description and Criminal Record Checking**

The job description outlines the general nature of the post including the main duties and responsibilities and it will identify the line manager for the post. It also incorporates the person specification (qualifications, attributes and skills required) and it is these criteria that are used as short-listing criteria by those scrutinising the applications. Other information included is a description of the department, background information to the post, further details such as closing date, salary, etc.

Blackpool Football Club and Academy endorses the use of The FA Criminal Records Checks (FACRC) through the Disclosure and Barring Service (DBS) to ensure appropriate assessment for clearance for work in football for those working with children, young people or vulnerable groups.

GBG administer the criminal records checking process on behalf of The Football association. This includes those roles that are defined by law as a Regulated Activity, or those roles for which the National Governing Body (NGB), that is The FA, has identified to require Enhanced Disclosures in football. These are defined as unsupervised roles in football that involve teaching, training and instruction or caring for and supervising.

Blackpool Football Club and Academy complies with the DBS and The FA Criminal Records Body (FA CRB) Code of Practice and seeks to treat all applicants for positions fairly. The Club and Academy undertakes not to discriminate unfairly against any subject of a disclosure on the basis of a conviction or other information revealed.

Blackpool Football Club and Academy is committed to safeguarding children, to the fair treatment of its staff/prospective employees and to equality of opportunity for all. We will select candidates for interview based on their skills, qualifications and experience. A DBS disclosure is requested only after consideration has been given to the roles and responsibilities included in the Job Description. Any decision to request a disclosure will be relevant to the position concerned. For those positions where an enhanced disclosure is required, the recruitment documents used will contain a statement that a disclosure will be requested in the event of the individual being offered the position as follows:

*“This post requires Enhanced Criminal Records Checks and checks against the Barred Lists and is exempt from Rehabilitation of Offenders Act (1974). Therefore all convictions including spent convictions that have not been subject to filtering by the DBS should be declared”.*

The definition of ‘spent conviction’ has changed in recent years, for further information on if a conviction is considered ‘spent’ go to: <https://www.gov.uk/exoffenders-and-employment>

Where a disclosure is to form part of the recruitment process, we encourage all applicants called for interview to provide details of their criminal record, if any, at an early stage in the application process. A self-disclosure form is included in the application pack too support this process.

We request that this information is sent under separate, confidential cover, to the Club’s designated Safeguarding Officer (DSO) or one of the

other safeguarding officers in our team who will be named in the recruitment process. We recognise the importance of confidentiality in relation to this sensitive information and therefore this information will only be seen by those who need to see it as part of the recruitment process.

Having a criminal record will not necessarily prevent an individual from working with Blackpool Football Club. An informed risk assessment of all of the information gathered through the recruitment process, including any offending history, will be undertaken in relation to the role and responsibilities applied for before any decision is made about suitability.

More information on the recruitment of offenders through GBG is available at:

[http://www.eeyfl.co.uk/files/The\\_FAs\\_Policy\\_Statement\\_on\\_the\\_recruitment\\_of\\_Ex-Offenders.pdf](http://www.eeyfl.co.uk/files/The_FAs_Policy_Statement_on_the_recruitment_of_Ex-Offenders.pdf)

### **4.3. Application Pack**

The Club and Academy's Application pack will supply prospective candidates with the following:

- A Club and Academy's application form or CV (including two references) <sup>[L]</sup><sub>[SEP]</sub>
- Job description/Specification <sup>[L]</sup><sub>[SEP]</sub>
- A self-disclosure form <sup>[L]</sup><sub>[SEP]</sub> The Club and Academy uses its own application form. All applicants for employment are required to complete this form before their application can be considered. This form contains questions about their academic achievements and full employment history. All applicants are required to account for any gaps or discrepancies in employment history and provide reasons for moving between posts. CVs without an application form will not be accepted.

The application form includes 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.

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 possible referral to the police and other professional regulatory bodies.

It will be communicated that the application form should be accompanied by a covering letter, when requested, outlining the applicant's suitability for the role.

## **5. Received applications and short-listing**

### **5.1. Handling applications**

- Applications submitted online will receive an automated acknowledgement email from the HR team. <sup>[L]</sup><sub>[SEP]</sub>
- All applications should be initially scrutinised by a member of staff who has completed safer recruitment training. Any applicant who has not completed the club's application form in full will be asked to do so if they wish to have their application considered further. <sup>[L]</sup><sub>[SEP]</sub>
- All those involved in the short-listing process have a responsibility to scrutinise the application forms and letters of application carefully. In addition to judging the application against the criteria for the post, anyone noticing an anomaly should make a written note to that effect. <sup>[L]</sup><sub>[SEP]</sub>
- The Academy Director and Team Leader will be responsible for collating a list of all applications as they arrive. <sup>[L]</sup><sub>[SEP]</sub>
- The Academy Director and Team Leader will have specific responsibility for ensuring that a thorough scrutiny of the application has taken place, as per safer recruitment guidelines, prior to the interview. This should include a month-by-month record of employment

since leaving education/school to the present date. Any gaps should be noted and followed up either immediately before or at interview. This scrutiny will form part of the specific questions regarding safeguarding during the formal interview process. [L] [SEP]

References of applicants who meet the short-listing criteria will be taken up, where possible, before interview unless this would compromise the applicant's current employment situation. Referees are sent the following: [L] [SEP]

- Standard letter via email [L] [SEP]
- A copy of the job description [L] [SEP]

Referees must include the most recent employer as well as the most recent employer who is able to indicate whether the applicant is suitable and appropriate to work with children or young people if relevant to the role applied for.

Open references or references that are solely character references from close family members or friends are not acceptable. [L] [SEP] Where a reference appears inadequate or incomplete, invites further contact, or contains conflicting information, contact should be made by a designated member of staff by telephone, to probe further. [L] [SEP]

The referee's copy of the job description should not include the salary details where a precise figure or hourly rate is included. [L] [SEP]

## **Shortlisting**

Following the closing date, a panel will independently scrutinise applications further using a selection matrix when necessary (a simple format, cross-referencing candidates against the criteria in the job description and the person specification).

In addition to judging the application form against the criteria for the post, anyone noticing an anomaly in the information provided will make

a written note to that effect to be followed up at interview if applicable.

The final shortlist will be drawn up by the Academy Director and Team Leader at a short-listing meeting. In the case of a coaching vacancy this meeting will normally be chaired by the Head of Coaching or the relevant team. In the case of support staff it will be the relevant team leader.

The short-listing meeting normally takes place within five days of the closing deadline. All those involved in the interview process should attend this meeting. Those unable to do so should send written recommendations to this meeting on the selection matrix.

## **6. Interview process**

All short-listed candidates are contacted by telephone or email to invite them to attend an interview and to ensure their availability. This will be completed by the Academy Director.

The candidate will be required to demonstrate their skill in the area advertised by way of a presentation or a possible demonstration to the interview board.

### **6.1. Interview Programme**

The interview process will explore the applicant's ability to carry out the job description and meet the person specification.

The programme normally includes:

- Tour of the department or area that the individual is going to work within <sup>[L]</sup><sub>[SEP]</sub>
- Practical exercise - Coaching, Physio or Sport Science - usually observed by the team leader <sup>[L]</sup><sub>[SEP]</sub>
- Coffee and/or lunch with staff members of the department/associated departments. <sup>[L]</sup><sub>[SEP]</sub>
- Interview <sup>[L]</sup><sub>[SEP]</sub> Core questions to be asked of all candidates will be agreed

by all interviewers prior to interview to ensure consistency, as well as any specific questions relating to an individual's application. [L] [SEP]

## **During the interview**

[L] [SEP] Candidates will always be required to: [L] [SEP]

- Explain satisfactorily any gaps in employment or significant periods of time working or living [L] [SEP] abroad [L] [SEP]
- Explain satisfactorily any anomalies or discrepancies in the information available to the [L] [SEP] interviewers [L] [SEP]
- Declare any information that is likely to appear on a criminal record disclosure [L] [SEP]
- Demonstrate their capacity to safeguard and protect the welfare of children and young people. [L] [SEP] A record will be made of responses and of any questions asked by the interviewee.

During the interview process relevant qualifications etc. will be scrutinised and checked by the Academy Director. Copies taken will be dated and signed to show that originals have been seen.

Any information in relation to past disciplinary action, allegations, cautions, investigations or convictions will be discussed and considered in the circumstances of the individual case during the interview process.

## **Candidate selection**

### **Final selection meeting**

This is held as soon as possible after the interview candidates have departed. This meeting involves all those involved in the selection/interview process. A record of decision making to appoint an individual ahead of others must be noted, to ensure that there is a

record to provide clear honest feedback to the unsuccessful candidate/s if required.

Interviewers bring any notes they have made with them (including presentation/demonstration observations if applicable); these are collected and put with the application file at the end of the process. All notes are stored for a minimum of 6 months. Notes regarding the successful candidate are transferred to their personnel file.

### **Contacting referees by telephone**

If there are any queries around information provided on a reference direct contact will be made to speak with the referee in order to explore further areas on the reference that require further clarification before evaluating the response.

An accurate record of the telephone call should be made (the written references should be annotated, dated and initialled).

### **Communicating the outcome**

The Academy Director or appointed member of the recruitment team will telephone the successful candidate as soon as possible.

If verbal acceptance is received, the letter of appointment together with the contract of employment is drafted and the Academy Director will approve and sign the letter.

All verbal and written offers (including those made by email) must state that it is a provisional offer, subject to the receipt of satisfactory references (if two satisfactory references are not received prior to interview) and criminal record (DBS) checks. Where these have not been confirmed it will also state that the offer is subject to verification of identity, proof of right to work in the UK, presentation of original copies of any qualifications having been seen and confirmation of medical fitness for the post. When a letter of acceptance is received unsuccessful candidates will be notified by the Academy Director.

If the successful candidate declines the offer of the post, the selection

committee reconvenes. Unsuccessful shortlisted candidates are generally not contacted, and this is stated at the time of application.

### **New Employee Administration and Induction**

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

### **Pre-employment vetting checks and commencing employment**

A new appointee should not commence employment until all criteria have been met. The process of checking qualifications, verifying identity and prohibitions, suitability of a newly appointed member of staff must be logged carefully on the Club and Academy's Single Central Register including and vetting checks determined by whether an individual will be involved in regulated activity.

All staff and managers will be checked for the following:

- Those that have been prohibited from participating in Football [L] [SEP]
- Those that have failed to successfully complete their induction or probation period [L] [SEP]
- Those that may be the subject of a suspension or conditional order imposed by the Football Association that is still current. [L] [SEP]

### **The single central record**

[L] [SEP] In addition to the various staff records kept in Club and Academy and on individual personnel files, a single central record of recruitment and vetting checks is kept in accordance with EFL requirements. This is kept up-to-date by the Designated Safeguarding Officer. [L] [SEP] The single central record contains details of the following: [L] [SEP]

- All employees who are employed to work at the Club and Academy [L] [SEP]

- All employees who are employed as staff to the Club and Academy whether employed directly or on a voluntary basis [L] [SEP]
- All others who have been appointed to positions by the Club and Academy that have regular contact with children and young people. This will cover volunteers, staff and people brought into the Club and Academy to provide additional coaching or instruction for pupils but who are not staff members e.g. sports coaches, guest speakers etc. [L] [SEP]

### **Vetting checks, Identity checks and right to work** [L] [SEP]

All applicants invited to attend an interview at the Club and Academy 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 the UK in accordance with those set out in the Immigration, Asylum and Nationality Act 2006 and the DBS Code of Practice Regulations.

Copies of these original documents should be taken, dated and signed to verify that the originals have been seen and these should be retained on personnel files. [L] [SEP] All employees of the Club and Academy are in regulated activity and therefore the Enhanced DBS Disclosure, including barred list check will be required.

[L] [SEP] The Designated Safeguarding Officer should write directly to the successful candidate regarding arrangements for an enhanced disclosure application from the Disclosure and Barring Service. This is before any start date, and as soon as practicable after an appointment, but no earlier than three months before employment commences. [L] [SEP] It is the Club's policy to require all staff and volunteers to renew their DBS check every 3 years or whenever they change roles within the Club and Academy. This is in line with recommended good practice by the Football Association and English Football League (EFL.).

Parallel entries of subsequent DBS checks will be recorded on the Single Central Register. [L] [SEP] Members of staff at the Club and Academy should be

made aware of their obligation to inform the Academy <sup>[L]</sup><sub>[SEP]</sub>Manager and Designated Safeguarding Officer of any cautions or convictions that arise between these checks taking place. Any employee who is convicted of, or cautioned for, any offence during their employment must immediately notify in writing the Academy Director and/ or Designated Safeguarding Officer of the offence and penalty. This requirement will be integrated into their contract of employment.

### **Barred list**

A separate barred list check must be undertaken in the event that an enhanced disclosure is not received in advance of a member of staff starting work in regulatory activity. It is illegal for Club and Academy to employ anyone who is on the barred list.

### **Qualifications**

New employees will be asked to bring in original documents or certificates of relevant registration, training or qualifications so that copies can be lodged on their personnel file.

### **Disqualification**

Under the Childcare Act 2006 and the Childcare (Disqualification) Regulations 2009 staff can be disqualified, including by association, from working in or being concerned in the management of childcare. Any employee likely to fall into this category completes a declaration form and is asked to keep the Club and Academy informed of any changes in their personal circumstances. Annual written reminders of this requirement are sent with the EFL YD2 form

### **Induction**

All new staff new will be required to undertake induction training. This will include:

- Induction meeting and briefing with their team leader <sup>[L]</sup><sub>[SEP]</sub>
- Safeguarding training <sup>[L]</sup><sub>[SEP]</sub>

- Provision of key safeguarding policies: the staff code of conduct; equality policy; and the whistleblowing policy [L] [SEP] health and safety training [L] [SEP]

### **Record retention/data protection [L] [SEP]**

All interview notes for applicants will be retained for a period of 6 months after which time the notes will be destroyed (i.e. shredded). The six-month retention period is in accordance with the Data Protection Act 1998 and will also allow the Club and Academy to manage and respond to any data access requests, recruitment complaints or to respond to any complaints made to an employment tribunal.

### **[L] [SEP] Ongoing employment**

[L] [SEP] It is recognised 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 and Academy will therefore identify and provide appropriate ongoing training and support for all staff, as identified through the annual review/appraisal procedure. [L] [SEP]

[L] [SEP] The Academy Director and DSO hold responsibility for monitoring the implementation of this policy and the single central register. [L] [SEP]

All staff leaving employment will be invited to attend an exit interview at which time an exit questionnaire will be completed by the employee and line manager. This will be forwarded to the HR manager for retention monitoring purposes and also to be included the individual's personnel file. [L] [SEP]

### **Use of contractors**

Contractors that are used within the Club should comply with the Club and Academy's Safeguarding and Safer Recruitment requirements.

### **Volunteers**

Volunteers who are working within the Club and Academy will be subject

to the same employment and vetting checks as paid staff subject to assessment of their role and responsibilities and whether they will be working in any unsupervised capacity.

Volunteer roles will be assessed to see whether they fall within regulated activity and, if so, they will be subject to completion of identity checks, an application form, and an enhanced disclosure from the DBS will be applied for. They will also be asked for references and will require an interview. All checks carried out will be recorded on the single central register.

Regular volunteers receive a letter of agreement confirming that they will not be asked to take sole responsibility for any individual players or teams and that they should always have the support of a member of staff and work under their supervision, support and guidance. The allocated member of staff is identified in this letter.

All volunteers are required to read the staff code of conduct and the safeguarding policy to acknowledge in writing that they have understood these and agree to comply with them.