



## SAFER RECRUITMENT POLICY

### Introduction

Reading Football Club is committed to and fully accepts its responsibility for safeguarding and promoting the welfare of children and young people who engage with the Football Club. As an employer, the Football Club expects all staff 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 and young people or are otherwise unsuited to working with them by having appropriate procedures for appointing staff.

The aims of the Football Club 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 age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex (gender), sexual orientation
- to ensure compliance with all relevant legislation, recommendations and guidance including the Reading Football Clubs 'Safeguarding Children and Young People' policy.
- to ensure that the Football Club meets its commitment to safeguarding and promoting the welfare of children and young people 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 and the Football Club's Safeguarding Children and Young People policy available from the Head of Safeguarding and [www.readingfc.co.uk](http://www.readingfc.co.uk)

The Football 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 Football 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 Football 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 Reading Football Club.

### Roles and responsibilities

It is the responsibility of the HR Manager and Head of Safeguarding to:

- ensure the Football Club has effective policies and procedures in place for recruitment of all staff.
- monitor the Football Club's compliance with them.
- It is the responsibility of the Human Resource department, Head of Safeguarding



and other Managers involved in recruitment to:

- ensure that the Football Club operates safe recruitment procedures and makes sure all appropriate checks are carried out on all staff 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.

#### *Definition of Regulated Activity and Frequency*

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

- frequently, meaning once a week or more; or
- overnight, meaning between 2.00 am and 6.00 am; or
- satisfies the "period condition", meaning four times or more in a 30 day period; and
- provides the opportunity for contact with children.

The Football Club is not permitted to check the Children's Barred List unless an individual will be engaging in "regulated activity". The Football Club is required to carry out an enhanced DBS check for all staff who will be engaging in regulated activity. However, the Football 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 Football 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 Football Club's commitment to safeguarding and promoting the welfare of children.

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

##### **Application Forms**

Reading 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 Football 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 Football 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.

## References

References for shortlisted applicants will be sent for immediately after shortlisting. 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 references which are considered satisfactory by the Football 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. Direct contact by phone will be undertaken with each referee to verify the reference.

The Football 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

The Football Club carries out a number of pre-employment checks in respect of all prospective employees.

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 Football Club's standard terms and conditions of employment;
- verification of the applicant's identity (where that has not previously been verified);
  
- the receipt of two references (one of which must be from the applicant's most recent employer) which the Football Club considers to be satisfactory;
- where the position amounts to "regulated activity" the receipt of an enhanced disclosure from the DBS which the Football 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 applicant's medical fitness for the role;
- verification of the applicant's 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 Football 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).

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Whether a position amounts to "regulated activity" must therefore be considered by the Football Club in order to decide which checks are appropriate. It is however likely that in nearly all cases the Football 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 children. Therefore, any convictions and cautions that would normally be considered 'SPENT' must be declared when applying for any at Reading Football Club.

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

The Football 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 Football 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 Football Club's policy that the DBS disclosure must be obtained before the commencement of employment of any new employee.

It is the Football 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.

Members of staff at Reading Football Club are aware of their obligation to inform the Head of Safeguarding or the HR Department of any cautions or convictions that arise between these checks taking place.

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

### Portability of DBS Certificates Checks

Staff may wish to join the DBS Update Service if they are likely to require another check in the future. Applicants may sign up to the Service if their check was issued after 17 June 2013, for a fee of £13 per annum, which is payable by the applicant.

### Copies of DBS Checks

The DBS no longer issue Disclosure Certificates to employers, therefore employees/ applicants should bring their Certificate to the Head of Safeguarding or the Human Resources Department, Madejski Stadium, Jun 11, M4, reading, RG2 OFL (for employees within 7 days of issue or applicants before they commence work or any project involving regulated activity).

### Dealing with convictions

The Football 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 with the Head of Safeguarding and the Human Resource Manager. 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 Head of Safeguarding and the Human Resource Manager 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 Football 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 School 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 School 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. In addition, applicants must be able to demonstrate that they have actually obtained any academic or vocational qualification legally required for the position and claimed in their application form.

### **Medical Fitness**

The Football Club is legally required to verify the medical fitness of anyone to be appointed to a post at the Club, after an offer of employment has been made but before the appointment can be confirmed.

All applicants are requested to complete a medical questionnaire and where appropriate a doctor's medical report may be required. This information will be reviewed against the Job Description and the Person Specification for the particular role, together with details of any other physical or mental requirements of the role. The Football Club is aware of its duties under the Equality Act 2010. No job offer will be withdrawn without first consulting with the applicant, obtaining medical evidence and considering reasonable adjustments.

### **Overseas checks**

The Football Club, in accordance with the UK Visas and Immigration (UKVI) will, if applicable, sponsor new foreign nationals (see Certificate of Sponsorship section). In addition, applicants who have lived/travelled abroad for more than 3 months will need to obtain a criminal records 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 Football Club.

### **Certificates of Sponsorship (CoS)**

If an appointed applicant is a national of a non-EEA country, a CoS may be required. Before any offer of employment is made, the Interviewing Managers should consult with the Human Resource Department to establish whether the Football Club has any unallocated Sponsorship Certificates.

Criteria for issuing a CoS are:

- The job is in a "designated shortage" occupation, or
- It passes the Resident Labour Market Test (RLMT)
- Minimum salary levels as stated by the UKVI are met.

Only the Human Resource Department will be able to issue a CoS. In addition to the CoS the applicant must apply for entry clearance/leave to remain through the UK Visas and Immigration (UKVI) and comply with the UKVI requirements.

The process can take up to three months and staff cannot, under any circumstances, be employed until permission is given.

Detailed advice on the above is available from the Human Resource Department.



### **Induction Programme**

All new staff will be given an induction programme which will clearly identify the Football Club policies and procedures, including the Child Protection Policy, Playing for Inclusion workshop and make clear the expectations which will govern how staff carry out their roles and responsibilities.

### **Single Centralised Register of Members of Staff**

In addition to the various staff records kept in the HR Department and on individual personnel files, a single centralised record of recruitment and vetting checks is kept in accordance with the EFL English Football League. This is kept up-to-date and retained by the Head of Safeguarding Madejski Stadium, Jun 11, M4, Reading, RG2 0FL. The Single Centralised Register will contain details of all staff who are employed to work at the Football Club in a regulated activity.

### **Record Retention / Data Protection**

The Football Club is legally required to undertake the above pre-employment checks. Therefore, if an applicant is successful in their application, the Football 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 Football Club to discharge its obligations as an employer e.g. so that the Football Club may consider reasonable adjustments if a member of staff suffers from a disability or to assist with any other workplace issue.

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

Reading Football Club 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**

Reading Football Club 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 Football Club will therefore provide ongoing training and support for all staff, as identified through the Annual Performance Development Review procedure.

### **Leaving Employment at Reading Football Club**

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 Football 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 Football Club despite being barred from working with children; or

has been removed by the Football Club from working in regulated activity, or has resigned prior to being removed, because they have harmed, or pose a risk of harm to, a child or young person.



### **Contractors and agency staff**

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

Agencies who supply staff to the Football Club must also complete the pre-employment checks which the Football Club would otherwise complete for its staff. Again, the Football Club requires confirmation that these checks have been completed before an individual can commence work at the Football Club.