



SAFER RECRUITMENT POLICY

Luton Town Football Club

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LUTON TOWN FOOTBALL CLUB

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INTRODUCTION

The safe recruitment of staff is the first step to safeguarding and promoting the welfare of children in Sport. The Club is committed to safeguarding and promoting the welfare of all children and vulnerable adults in its care. As an employer, the Club expects all staff and volunteers to share this commitment.

In line with recent legislation including the Children Act 2004, Safeguarding Children and Safer Recruitment in Education Guidance DfES/04217/2006, The Independent Schools Standards Regulations 2009 (Standards 4, 4A, 4B, 4C), and the Safeguarding Vulnerable Groups Act 2006 and the Keeping Children Safe in Education, 2020, the Club takes very seriously its duty of care for all children and vulnerable adults. In order to help safeguard and promote the welfare of all its participants, the Club is committed to a thorough and consistent Safer Recruitment Policy.

AIMS AND OBJECTIVES

The aim of the Safer Recruitment policy is to help deter, reject, or identify people who might abuse pupils/participants or are otherwise unsuited to working with them, by having appropriate procedures for appointing staff.

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 based on the applicant's abilities, qualifications, 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.

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.

This Club's objectives are to operate this procedure consistently and thoroughly while obtaining, collating, analysing, and evaluating information from and about applicants applying for job vacancies at the Club.





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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 and regulatory requirements.
- Monitor the Clubs compliance with them.

It is the responsibility of all staff 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 for the Club.
- To monitor contractors' and agencies' compliance with this document.
- Promote welfare of children and young people at every stage of the procedure.

The Board have delegated responsibility to the relevant member of Club staff to lead in all appointments. Board Members may be involved in staff appointments, but the final decision will rest with the Club's Chief Executive Officer.

RECRUITMENT AND SELECTION PROCEDURE

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 and vulnerable adults.

Advertising

To ensure equality of opportunity, the Club will aim to 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 Clubs commitment to safeguarding and promoting the welfare of children.





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All documentation relating to applicants will be treated confidentially and in accordance with data protection legislation.

Recruitment and promotion will be conducted on the basis of merit, against objective criteria that avoid discrimination.

Application Forms

Where applicable 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).

The application form will include the applicant's declaration regarding any criminal record 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.

Interviews

There will be a face-to-face interview wherever possible, and the same panel will see all 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.

While it is important to gain information about an applicant's technical abilities, it is also necessary to explore their attitudes and commitment to child welfare. The applicant will be given the opportunity to recount experiences and give examples of how they have or would handle situations.

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.

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.





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Original document will only be accepted, e.g., passport, driving licence, bus/train pass, and photocopies will be taken. Unsuccessful applicant documents will be destroyed following at the end of the recruitment programme.

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

All applicants invited to attend an interview with 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 CRC Code of Practice Regulations.

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.

References

References for short listed 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. In such cases, this reference will be taken up immediately after interview and prior to any formal offer of employment being made. Two professional/character references must be provided. These will always be sought and obtained directly from the referee and their purpose is to provide objective and factual information to support appointment decisions. Any discrepancies or anomalies will be followed up. If applicable and where possible direct contact by phone or face-to-face will be undertaken with each referee to verify the reference.

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

Recruitment Decisions

The Club will consider all the information it received via the application form, confirmation of identity, references, and DBS checks alongside the individual's performance at interview to make an informed decision as to whether or not to make an offer of employment.

OFFER OF APPOINTMENT AND NEW EMPLOYEE PROCESS

The appointment of all new employees is subject to the receipt of a satisfactory DBS Certificate (where applicable), references, medical checks (where applicable), copies of qualification and proof of permission to work in the UK. A personal file checklist will be used to track, and audit paperwork obtained in accordance with the NCSL 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 children or





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vulnerable adults. Therefore, any convictions and cautions that would normally be considered 'SPENT' must be declared when applying for any position at the Club.

DBS (Disclosure and Barring Services) Check

Certain roles as defined based on regulated activity require a DBS Certificate and therefore a DBS Certificate must be obtained before the commencement of employment of a new employee as applicable.

Members of staff at the Club are aware of their obligation to inform their Manager of any cautions or convictions that arise between these checks taking place.

Copies of DBS Checks

The FA DBS check service is now online and no longer issues Disclosure Certificates to employers; therefore employees/applicants should produce their Certificate as soon as possible before they commence work or any project involving regulated activity.

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 to:

- the nature, seriousness, and relevance of the offence;
- how long ago the offence occurred;
- one-off or history of offences;
- changes in circumstances,
- the circumstances surrounding the offence and the explanation offered.

If applicable a formal meeting will take place face-to-face to establish the facts with the relevant Manager. This may be included as part of the interview process. A decision will be made following this meeting.

Medical Fitness

Anyone appointed to a post involving regular contact with children must possess the appropriate level of physical and mental fitness before any appointment offer is confirmed.

Induction Programme

All new employees will be given an induction programme which will clearly identify the Club policies and procedures, including the Safeguarding Policies and make clear the expectation and codes of conduct which will govern how staff carry out their roles and responsibilities.



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Single Centralised Register of Members of Staff

In addition to the various staff records kept in school and on individual personnel files, a single centralised record of recruitment and vetting checks is kept in accordance with EFL/FA requirements. This is kept up-to-date and retained by the Safeguarding team. The Single Centralised Register will contain details of all employees and volunteers who provide services to the Club.

The Academy DSO will be responsible for auditing the Single Centralised Register and reporting findings to the Club required.

Record Retention / Data Protection

The Club will retain all interview notes on all applicants for a period of 6 months, after which time the notes will be destroyed. The 6-month retention period will allow the Club to deal with any data access requests, recruitment complaints or to respond to any complaints made to an Employment Tribunal.

All information retained on employees is kept centrally in a locked and secure cabinet.

Ongoing Employment

The 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 Club will therefore provide ongoing training and support for all staff, as identified through the Annual Review/appraisal procedure.

Leaving Employment

Despite the best efforts to recruit safely there will be occasions when allegations of abuse against children and vulnerable adults are raised. In cases relating to the behaviour of an employee (these behaviours are within the context of four categories of abuse (i.e.: physical, sexual, and emotional and neglect) the Club's Disciplinary Policy will apply.

In cases of dismissal (or resignation) due to the above behaviour, the Club will inform the Children's FA Safeguarding Unit of the circumstances why the employee is leaving the Club's employment.

Monitoring and Evaluation

The Club's Senior Safeguarding Manager will be responsible for ensuring that this policy is monitored and evaluated throughout the Club. This will be undertaken as part of the Clubs annual policy review process in July.

Date of next review: July 2022

