



<b>SECTION</b>	SAFEGUARDING
<b>POLICY/PROCEDURE</b>	SAFER RECRUITMENT POLICY
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## **1. ABOUT THIS POLICY**

This document sets out the policy and the procedures to be followed where there is a need to recruit a new employee into Lincoln City Football Club (“the Club”). The information provided here serves as a guide only, and it is important that Line Managers keep the senior management of the Club up to date regarding future recruitment intentions. In all cases, the guidelines promulgated in the Equal Opportunities Policy should also be followed.

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 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 Club’s performance and fundamental to the delivery of high quality 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 is committed to providing equality 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 will ensure that equal opportunities are promoted in line with its Equal Opportunity Policy. Candidates will be asked to complete an Equal Opportunities Monitoring Form when applying for roles. This is so that we can monitor the effectiveness of our recruitment strategy and equal opportunities.

## **3. 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, contractors, volunteers, and agency workers in accordance with legal requirements and guidance. The board will also monitor compliance.

It is the responsibility of the Chief Executive Officer, the Academy Manager, Heads of Department, Senior Safeguarding Manager (SSM), Designated Safeguarding Officers (DSOs), and others involved in recruitment to ensure that the Club operates safer recruitment procedures and makes sure all appropriate checks are carried out on all staff and contractors who work at the Club as well as 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 line with the Club’s commitment to safeguarding and



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promoting the welfare of children, young people, and adults at risk (see Safeguarding Children and Vulnerable Adults Policy).

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 Manager, DSO, or Senior Management team 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; and
- the enhanced DBS disclosure has been applied for before the start date; and
- a satisfactory separate barred list check has been completed; and
- all other checks (including references) have been completed.

Candidates are requested to complete a Self-Declaration when applying for a job.

#### **4. ADVERTISING AND 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 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's own website and social media channels. Any advertisement will include a clear statement of the Club's commitment to safeguarding and promoting the welfare of children.

Advertisements will provide relevant links to the Application Form and Guidance, Self-Declaration Form, and Equal Opportunities Monitoring Form.

##### **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, etc.

The Club 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 Online Disclosures administer the criminal records checking process on behalf of The Football Association. This includes those roles which 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.



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The Club 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 undertakes not to discriminate unfairly against any subject of a disclosure on the basis of a conviction or other information revealed.

The Club is committed to safeguarding children, to the fair treatment of its staff/prospective staff, and to equality of opportunity for all. We will select candidates for interviews 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 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 to support this process.

We request that this information be sent under separate, confidential cover, to the Club’s Senior Safeguarding Manager (SSM) or person 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 the 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’s Application Information will supply prospective candidates with the following:

- Company Application Form
- Job description
- A self-disclosure form



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- Equal Opportunities Monitoring Form

The Club 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 be received by HR.
- 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.
- 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.
- An appropriate member of the senior management team will be responsible for collating a list of all applications as they arrive.
- An appropriate member of the senior management team 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 the interview. This scrutiny will form part of the specific questions regarding safeguarding during the formal interview process.

### **5.2. References**

References of applicants will only be taken up upon acceptance of an offer of employment which is subject to conditions, including receipt of satisfactory references.



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Referees are sent the following:

- standard letter via email; and
- a copy of the job description.

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.

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.

The referee's copy of the job description will not include the salary details.

### **5.3. 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 the interview if applicable.

The final shortlist will be drawn up at a short-listing meeting. In the case of a coaching vacancy, this meeting will normally be chaired by the Academy Manager, First Team Manager, or Chief Executive Officer. In the case of support staff, it will be the relevant team leader and/or HR.

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 and/or email to invite them to attend an interview and to ensure their availability.

An interview panel will be selected, and interview questions prepared relating to the role and job description.

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



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Dependent upon the role, there may be a two-stage interview process. A first interview may take place with HR, which may be conducted in person or via Zoom. All final interviews will be conducted face to face.

### **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;
- Practical exercise - Coaching, Physio or Sports Science - usually observed by the team leader;
- Coffee with staff members of the department/associated departments;
- Interview; and
- Feedback on case study if appropriate.

Core questions to be asked of all candidates will be agreed upon by all interviewers prior to the interview to ensure consistency, as well as any specific questions relating to an individual's application.

### **6.2. During the interview**

Candidates will always be required to:

- explain satisfactorily any gaps in employment or significant periods of time working or living abroad;
- explain satisfactorily any anomalies or discrepancies in the information available to the interviewers;
- declare any information that is likely to appear on a criminal record disclosure; and
- demonstrate their capacity to safeguard and protect the welfare of children and young people.

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 Manager and/or HR. 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.

## **7. CANDIDATE SELECTION**

### **7.1. Final selection meeting**



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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.

### **7.2. Contacting referees by telephone**

If there are any queries around the 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 initialed).

### **7.3. Communicating the outcome**

The Academy Manager, First Team Manager, HR, or appointed member of the recruitment team will telephone the successful candidate as soon as possible.

If verbal acceptance is received, the offer letter of appointment is sent to the successful candidate by email along with employee starter information.

Upon receipt of a signed offer of acceptance, the contract of employment is drafted by HR and issued to the successful candidate. References are then requested.

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 short-listed candidates will be notified.

If the successful candidate declines the offer of the post, the selection committee reconvenes. The post may be offered to a second-choice candidate or re-advertised.

Due to the volume of applications received, only those candidates shortlisted for interviews will be contacted.



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## **8. 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.

### **8.1. 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's Single Central Register including 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;
- those that have failed to successfully complete their induction or probation period; and
- those that may be the subject of a suspension or conditional order imposed by the Football Association that is still current.

### **8.2. The single central record**

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 in accordance with EFL requirements. This is kept up-to-date by the Academy Designated Safeguarding Officer (DSO) and the Senior Safeguarding Manager (SSM).

The single central record contains details of the following:

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

### **8.3. Vetting checks, Identity checks and right to work**

All applicants invited to attend an interview at the Club will be required to bring their identification documentation such as a 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.



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Employees of the Club may be engaged in regulated activity and therefore the Enhanced DBS Disclosure, including barred list check will be required (see section 4.2. above).

The Designated Safeguarding Officer (DSO) should write directly to the successful candidate regarding arrangements for an enhanced disclosure application from the Disclosure and Barring Service (DBS). This is before any start date, and as soon as practicable after an appointment, but no earlier than three months before employment commences.

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. 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.

Members of staff at the Club should be made aware of their obligation to inform the Academy Manager, Designated Safeguarding Officer, and HR 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 Manager and/ HR or Designated Safeguarding Officer of the offence and penalty.

This requirement will be integrated into their contract terms.

#### **8.4. 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 the Club to employ anyone who is on the barred list.

#### **8.5. 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.

#### **8.6. 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 informed of any changes in their personal circumstances. Annual written reminders of this requirement are sent with the EFL YD2 form.

#### **8.7. Induction**

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

- induction meeting and briefing with their team leader;
- safeguarding training;



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- provision of key safeguarding policies: the staff code of conduct; equality policy; and the whistleblowing policy;
- health and safety training; and
- any specific training relevant to their role.

#### **8.8. Record retention/data protection**

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 to manage and respond to any data access requests, recruitment complaints or to respond to any complaints made to an employment tribunal. All personal sensitive data is retained in accordance with GDPR requirements.

#### **8.9. Ongoing employment**

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 will therefore identify and provide appropriate ongoing training and support for all staff, as identified through the annual review/appraisal procedure.

#### **8.10. Monitoring**

The Academy Manager, DSO, SSM, and HR hold responsibility for monitoring the implementation of this policy and the single central register.

#### **8.11. Leaving employment**

All staff leaving employment will be invited to complete an exit questionnaire to be completed by the employee and Line Manager. This will be forwarded to HR for retention and monitoring purposes. A copy will also be included in the individual's personnel file.

#### **8.12. Use of contractors**

Contractors that are used within the Club should comply with the Club's safeguarding and safer recruitment requirements.

#### **8.13. Volunteers and Interns**

Volunteers and Interns who are working within the Club will be subject to the same employment and vetting checks as paid staff subject to an assessment of their role and responsibilities and whether they will be working in an 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.



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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.

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.

## **9. INTERNAL SAFEGUARDING CONTACTS**

### **Senior Safeguarding Manager**

Liam Scully

Chief Executive officer

01522 880011

[lscu@theredimps.com](mailto:lscu@theredimps.com)

### **Club Designated Safeguarding Officer**

Richard Parnell

General Counsel

01522 880011 / 07508 698127

[rpar@theredimps.com](mailto:rpar@theredimps.com)

### **Academy Designated Safeguarding Officer**

Emma Metheringham

Academy Head of Education

01522 880011 / 07946 456701

[emet@theredimps.com](mailto:emet@theredimps.com)

### **Foundation Designated Safeguarding Officer**

Martin Hickerton

Chief Executive Officer

01522 563792 / 07736 900333

[Martin.hickerton@lincolncityfoundation.co.uk](mailto:Martin.hickerton@lincolncityfoundation.co.uk)

## **10. EXTERNAL SAFEGUARDING CONTACTS**

### **EFL Head of Safeguarding**

Alexandra Richards

Safeguarding Manager

01772 325940 / 07792 284740

[arichards@efl.com](mailto:arichards@efl.com)



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**Lincolnshire County FA**

Sarah Pridmore

Designated Safeguarding Officer

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**Lincolnshire Customer Service Centre**

Rachel Freeman

Head of Service

01522 782111

**Out of Hours Emergency**

01522 782333

**Police**

If you have concerns requiring the Police's immediate action, dial 999.