



Safer Recruitment and Selection Policy

NEWPORT COUNTY AFC

Document type	Safer Recruitment and Selection Policy
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Signed off by	Gavin Foxall
Board review and agreement	October 2022
Next review date	October 2023
Version I.D.	4

Newport County AFC 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.

We are also committed to promoting a diverse and inclusive community and therefore we are seeking to diversify our workforces during recruitment.

The aims of the Safer Recruitment and Selection 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 and volunteers.

The aims of Newport County AFC's recruitment policy are as follows:

- To ensure that the best possible staff are recruited based on 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, as detailed in line with the protected characteristics detailed in the Equality Act 2010.
- To ensure compliance with all relevant legislation, recommendations and guidance including the Newport County AFC Child Protection and Safeguarding Policy
- To ensure that Newport County AFC 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 Newport County AFC's Child Protection and Safeguarding Policy, both of which are available via the Head of Safeguarding, or via the Club website POLICIES - Newport County (newport-county.co.uk)

Newport County AFC 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, 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.

Newport County AFC aims 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.

The club will always endeavour to run an open process for all its positions. However, there may well be instances where the club decides to directly appoint a person who meets the person specification. This approach will be agreed at Board level in every instance.

In the event this recruitment approach is followed, the club will ensure that all safer recruitment processes are completed as outlined in this policy.

This policy is inclusive of all staff whether in paid or unpaid roles and reflects the statutory guidance of Keeping Children Safe in Education 2021, Working Together To Safeguard Children 2019, and the Rehabilitation of Offenders Act 1974.

The policy aims to ensure that children in all aspects of the club are safe and in the care of staff members that have been recruited and selected in accordance with this guidance.

Roles and responsibilities

It is the responsibility of the Board of Directors, General Manager and Safeguarding Officer to:

- Ensure that Newport County AFC has effective policies and procedures in place for the recruitment of all staff and volunteers.
- Monitor Newport County AFC's compliance with them.

It is the responsibility of the Board of Directors, General Manager, Safeguarding Officer, and other Managers involved in recruitment to:

- Ensure that Newport County AFC operates safe recruitment procedures and makes sure all appropriate checks are carried out on all staff, volunteers, agency workers, scouts and contractors who work at or on behalf of the Club.
- Promote the 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 Newport County AFC will amount to 'regulated activity' if it is carried out:

- Frequently, meaning once a week or more
- Overnight, meaning between 2am and 6am
- Satisfies the 'period condition', meaning four times or more in a 30-day period
- Provides the opportunity for contact with children Newport County AFC is not permitted to check the Children's or Adult's Barred List unless an individual will be engaging in "regulated activity".

The Club is required to carry out an Enhanced DBS check for all staff who will be engaging in regulated activity. However, the 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 Process Advertising

To ensure equality of opportunity, Newport County AFC will advertise all vacant posts to encourage as wide a field of applicants as possible; normally this entails an external advertisement. Any advertisement will make clear Newport County AFC'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) and GDPR UK guidance.

Application Forms

Newport County AFC 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 Newport County AFC 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 with Newport County AFC.

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.

All applicants will be requested to complete a self-disclosure form on applying for the vacant position, and this can be sent separately to your application form and covering letter to the Safeguarding Officer, Academy Manager or General Manager. This form will be included in the application pack, and we recommend that details of criminal records, if any, are disclosed early in the recruitment process.

All line managers should be aware that satisfactory Enhanced DBS disclosures must be received for all new staff who are taking up Regulated Positions prior to commencement of their role.

The 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:

- Risk assessments are in place to ensure that the individual is always supervised whilst awaiting a Club DBS
- The Enhanced DBS disclosure has been applied for before the start date
- A satisfactory separate barred list check has been provided by the individual, which is at the same level of check of the role applied for and must be dated within the last six months. This must be shown to the Safeguarding Officer and a copy held on the personnel file whilst we are waiting for their Club certificate to clear.
- All other checks (including references, both written and verified) have been completed and are satisfactory.

Newport County AFC 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.

First Advantage administer the criminal records checking process on behalf of the Football Association, where we use the Professional Game system including Know Your People, which will eventually allow us to complete digital identity checks.

The Professional Game system will enable us to 'port over' any existing DBS check issued by First Advantage that is relevant for the role that the individual is applying for, if it is less than 6 months old.

The system will also show us if a person's certificate is clear or contains content. In the instance it is clear, we will record the certificate number and date of issue on our Single Central Record. In the instance that the certificate contains content, the Club can request to see the certificate to undertake a relevant risk assessment. Failure to do so within the specified timescale can result in an offer of employment being terminated.

In the instance that someone has applied for work with children or vulnerable adults whilst on the barred list, the Club will have no option but to withdraw the offer of employment and carry out their legal obligations of referring you to the police, local authorities and DBS service. We will also refer to the FA, FAW and EFL.

Newport County AFC 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 steps not to discriminate unfairly against any subject of a disclosure based on a conviction or other information revealed.

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 written and verified references which are considered satisfactory by Newport County AFC. 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 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. 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.

Newport County AFC does not accept open references, testimonials, or references from relatives.

Interviews

All applications will be scrutinised for shortlisting which will usually take place within five working days of the vacancy advertisement closing. Successful applicants will then be contacted to be invited along to an interview. 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 that have been identified to satisfy themselves that the chosen applicant can meet the safeguarding criteria (in line with Safer Recruitment Training) and may also include a practical session with young people.

Any information regarding 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 documents only will be accepted, and photocopies will be taken. Unsuccessful applicant documents will be destroyed six months after the recruitment programme.

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.

Safeguarding questions will be asked within all interviews relevant to the role. The final selection meeting 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 in a secure location. Notes regarding the successful candidate are transferred to their personal file.

Offer of Appointment and New Employee Process

Newport County AFC carries out several 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 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 written and verified references (one of which must be from the applicant's most recent employer) which the Club considers to be satisfactory. Please note that should this be an internal appointment, only one written and verified external reference is required.

- Where the position amounts to “regulated activity” confirmation that the applicant is not named on the Children’s Barred List* via a DBS check
- 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 result of the applicant having lived or worked outside of the UK
- Verification of professional qualifications which Newport County AFC deems a requirement for the post, or which the applicant otherwise cites in support of their application (where they have not previously been verified).
- Risk assessment for any reasonable adjustments in the workplace to be made

*Newport County AFC is not permitted to check the Children’s Barred List unless an individual will be engaging in “regulated activity”. The Club is required to carry out an Enhanced DBS check for all staff who will be engaging in regulated activity. However, Newport County AFC 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. Whether a position amounts to “regulated activity” must therefore be considered by Newport County AFC to decide which checks are appropriate in line with the EFL Eligibility guidance. It is however likely that in nearly all cases the Club will be able to carry out an Enhanced DBS check and a Children’s Barred List check.

A satisfactory DBS check and completion of the personnel file, initial training and induction must be in place prior to commencement of the employee start date.

Newport County AFC can request to see a copy of a previous DBS check dated within the last 6 months. If the Club DBS check appears to have content as detailed on First Advantage, then the Club can also request to view the certificate. Failure to provide the certificate can result in an offer of employment being terminated. If a certificate is showing as clear by First Advantage, then we will record the certificate number on our Single Central Record.

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 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 vacancies at Newport County AFC. 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>

Having a criminal record will not necessarily prevent an individual from working with Newport County AFC. An informed risk assessment of all 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 First Advantage is available at:

http://www.eeyfl.co.uk/files/The_FAs_Policy_Statement_on_the_recruitment_of_Ex-Offenders.pdf

Newport County AFC 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 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 Newport County AFC’s policy that the DBS disclosure must be obtained before the commencement of employment of any new employee. The Club’s will also re-check employee’s DBS certificates every three years and in addition any employee that takes leave for more than three months (i.e., maternity leave, career break etc) must be re-checked before they return back to work.

Members of staff at Newport County AFC are aware of their obligation to inform the Head of Safeguarding or General Manager 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 and Copies of DBS Certificate Checks

The DBS no longer issue Disclosure Certificates to employers; therefore employees/applicants should bring their certificate to the Safeguarding Officer, Academy Manager or General Manager at either Lliswerry High School Offices (Academy) or Rodney Parade Offices (Club) (for employees within 7 days of issue or applicants before they commence work or any project involving regulated activity).

Dealing With Convictions

Newport County AFC 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 Safeguarding Officer and General Manager. A decision will be made following this meeting. If 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 Safeguarding Officer and General Manager will evaluate all 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 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 Newport County AFC will be required to bring their identification documentation such as passport, driving licence, birth certificate 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 DBS identity checking guidelines.

The Club 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 obtained any academic or vocational qualification legally required for the position and claimed in their application form.

If an appointed applicant is a national of a non-EEA country, a Certificate of Sponsorship may be required. Before any offer of employment is made, the interviewing managers should consult with the General Manager to establish whether the 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 General Manager 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.

Induction Programme

All new staff will be given an induction programme which will clearly identify the Club's policies and procedures, including training on the Club's safeguarding software – My Concern, Child Protection and Safeguarding Policy, Playing For Inclusion and Safeguarding in Sport online training. The induction will also 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 on individual personnel files, a single central 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. The Single Centralised Register will contain details of all staff who are employed to work at the Club in a regulated activity. This information at times is viewed and shared with our external stakeholders who are responsible for auditing processes within the Club.

Record Retention/Data Protection

Newport County AFC is legally required to undertake the above pre-employment checks.

Therefore, if an applicant is successful in their application, Newport County AFC 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 and qualifications. Medical

information may be used to help the Club to discharge its obligations as an employer e.g., so that the Club may consider reasonable adjustments if a member or staff suffers from a disability or to assist with any other workplace issue. This documentation will be retained by the Club for the duration of the successful applicant's employment with the Club. All information retained is kept centrally in a locked and secure cabinet, or on software that is password protected.

Newport County AFC will retain all interview notes on all unsuccessful applicants for a period of 6 months, after which time the notes will be confidentially destroyed (i.e., shredded). The 6-month retention period is in accordance with the Data Protection Act 1998 and GDPR UK.

Ongoing Employment

Newport County AFC 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 regular review.

Leaving Employment at Newport County AFC

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 Club also has a legal duty to make a referral to the DBS in circumstances where an individual; has applied for a position at Newport County AFC despite being barred from working with children; or has been removed by the 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 Newport County AFC must complete the same checks for their staff that Newport County AFC is required to complete for its staff. The Club requires confirmation that these checks have been completed before staff of the Contractor can commence work at the Club.

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

Volunteers

Volunteers who are working within the club 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.

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. All staff

and volunteers will also be asked to sign a copy of their job description, which clearly outlines their role and responsibilities.

Confidentiality

Both parties agree not to disclose any information acquired while volunteering, whether written or verbal, to any persons, unless specifically instructed to do so by law. The club reserves the right to terminate the services of any volunteer, at any point in time.

Disciplinary and Grievance

To ensure that the standards established by the Club's rules are maintained and that any alleged failure to observe the Club's rules is fairly dealt with, the disciplinary procedures will apply to you from the end of your probationary period except that the Club shall, until such time as you qualify for the statutory right not to be unfairly dismissed, be entitled not to apply the procedure to you in whole or in part.

Records

All cases of disciplinary action under these procedures will be recorded and placed in the Club's records. A copy of the Club's relevant personnel records in respect of you will be supplied at your request.

Categories of Offences

Offences under the Club's disciplinary procedures fall into three categories namely:

- Misconduct
- Gross misconduct
- Incapability

Any offences relating to the above will be dealt with in line with our Grievance & Disciplinary Policy.

Modern Slavery

Modern Slavery is a crime and a violation of fundamental human rights. Modern Slavery can take many forms including slavery, servitude, forced or compulsory labour and human trafficking.

The underlying principle is the exploitation of a person or the coercion of a person to work against their will for the benefit of another.

The Modern Slavery Act 2015 combines anti-slavery and human trafficking offences into one piece of legislation.

As per the Modern Slavery Act 2015, it is an offence to:

- Hold another person in slavery or servitude or require another person to perform forced or compulsory labour.
- Arrange or facilitate the travel of any person across borders with a view to that person being exploited (i.e., conduct or be involved in human trafficking);
- Commit an offence with the intention to commit human trafficking.

Newport County AFC understands and is alert to the risks of Modern Slavery and has a zero tolerance approach to Modern Slavery of any kind. Newport County AFC is committed to running its business in an ethical and lawful manner and, as such, all persons working for Newport County AFC, must comply with this statement and the Modern Slavery Act 2015.

This, in turn, will help the Club to ensure that modern slavery is not taking place anywhere within its club business, Academy setup or Community programmes.

Newport County AFC's Modern Slavery Statement confirms the commitment to acting ethically and with integrity in all business relationships. The statement also confirms Newport County AFC's intention to implement and effect systems to eradicate the risk of modern slavery and human trafficking taking place within central business and/or supply chains.

To ensure all staff are aware of the risks of modern slavery and human trafficking, Newport County AFC shall deliver appropriate in-house training to the necessary personnel, as well as ensuring regular review of policies, statements and practices relating to the areas of modern slavery. This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps taken by Newport County AFC to prevent modern slavery and human trafficking in our businesses and supply chains.

If you should have any concerns, please notify a member of the Senior Management or Safeguarding Team.

Useful Contacts

Gareth Evans – Club Secretary

Email: Gareth.evans@newport-county.co.uk

Luke Hussey – Academy Manager

Email: Luke.hussey@newport-county.co.uk

Darren Green - EFL Regional Safeguarding Manager

Email: dgreen@efl.com

Tel: 07581 048977

Mike Sloan - Newport City Council Local Authority Designated Officer (LADO)

Email: Mike.Sloan@newport.gov.uk

Tel: 01633 851485

FA Safeguarding

Tel: 0800 169 1863

Email: safeguarding@TheFA.com

NSPCC helpline Tel: 0808 800 5000

Police Tel: 999 or 101

