

SAFER RECRUITMENT AND SELECTION POLICY Wolverhampton Wanderers Football Club

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SAFER RECRUITMENT AND SELECTION POLICY

1. Introduction

This policy aims to provide a clear framework for safely recruiting and selecting appropriately experienced and qualified workers fairly and transparently. The policy applies to all workers involved in recruitment and selection, as well as third parties who recruit and select on behalf of Wolverhampton Wanderers Football Club (Wolves), candidates both external and internal.

This policy is to be reviewed / updated annually and as such time as new legislation or amendments take effect. In these cases, the policy will be updated at the earliest opportunity.

2. Safer Recruitment

Wolves recognises that anyone may have the potential to harm or abuse children or adults at risk in some way and is committed to taking all reasonable steps to ensure that unsuitable people are prevented from working with children or adults at risk.

We will act reasonably in making decisions about the suitability of the prospective candidate based on checks and evidence including the Disclosure and Barring Service (DBS), barred list checks together with references and interview information. The level of DBS certificate required, and whether a prohibition check is required, will depend on the role and duties of an applicant. Wolves follows the Premier League and GBG Online guidance on Roles in Football in respect of DBS checks.

We are clear to all potential applicants that background checks are carried out at the appropriate level (where applicable) as part of the hiring process. The Wolves vacancy website page directs potential applicants to the Ministry of Justice website for advice on whether cautions / convictions should be disclosed as part of their application.

Applicants will be required to undergo questioning in their interview relevant to safeguarding. The Head of Safeguarding can be consulted for advice on questions to ask, should this be required. For roles with specific safeguarding elements, the Head of Safeguarding or club Safeguarding Officer will attend at least one round of interviews.

Guidance for hiring managers on DBS checks for roles can be found here – working with Children / Working with Adults.

When recruiting for a position that involves significant contact with children or adults at risk, be it with internal or external applicants, Wolves operates a comprehensive recruitment procedure that includes:

- Completion of an Application Form that elicits information regarding an applicant's past
- Completion of a Self-Disclosure Form, which requires any applicant to declare past offences
- Verification of identity and eligibility to work in the UK / EU settlement documents
- Verification of professional qualifications
- Screening via the Disclosure and Barring Service / overseas criminal records check (where appropriate)

- Two references, including one regarding the applicant's most recent post working with children
- Registration with the appropriate professional body (if applicable)

If the DBS check reveals undisclosed offences or issues are raised in the references and preemployment checks, an interview with the applicant will be convened at the earliest opportunity with the Disclosure Manager for the department, along with the hiring manager for the post. The Wolves DBS Panel will then meet to decide upon the applicant's suitability for the role. A job offer can potentially be withdrawn.

If an applicant commences work prior to their DBS disclosure being received, a risk assessment will be completed, and they will be restricted from working with children and adults at risk unsupervised.

The successful applicant should attend the FA's safeguarding workshops and be given the club's safeguarding policies to read.

3. Statement on The Recruitment of Ex-Offenders

Having a criminal record will not necessarily bar a potential candidate from working with Wolves. This will depend on the nature of the position and the circumstances and background of the offence(s) committed.

As an organisation using the Disclosure and Barring Service (DBS) to assess applicant's suitability for positions of trust, Wolves complies fully with the DBS Code of Practice and undertakes to treat all applicants for positions fairly. It undertakes not to discriminate unfairly against any subject of a Disclosure on the basis of conviction or other information revealed.

The amendments to the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (2013 & 2020) provides that when applying for certain jobs and activities, certain convictions and cautions are considered 'protected'. This means that they do not need to be disclosed to employers, and if they are disclosed, employers cannot take them into account.

4. Points-Based Immigration System from 1st December 2020

On 31st December 2020, free movement rights ended for UK nationals travelling to the EU and vice versa. EU citizens and relevant family members who arrived in the UK on or before 31st December 2020 are eligible for pre-settled status under the EU settlement scheme. They must apply by 30th June 2021.

A new points-based immigration system was phased in from 1st December 2020. It caters for the most highly skilled workers, skilled workers with a job offer, students, graduates, global leaders in their field and innovators.

If Wolves identifies an overseas worker to fill a genuine vacancy, the Recruitment Specialist / HR team will follow the Government's regime together with the hiring manager. Costs may be borne by the hiring manager or the individual candidate, depending upon the situation. This will be decided on a case-by case basis.

5. Equality, Diversity & Inclusion Governance

Wolves is committed to appointing the best candidate for the job and to provide equality of opportunity. It is club policy to treat all job applicants, employees and workers fairly and equally, regardless of sex, pregnancy, trans-gender status, sexual orientation, religion or belief, marital status, civil partnership status, age or perceived age, race, colour, nationality, national or ethnic origins or disability ('protected characteristics').

Wolves is fully committed to the Premier League's Equality, Diversity & Inclusion Standard (PLEDIS) and proud to be a member and founding signatory of The FA Football Leadership Diversity Code. A copy of the Code is available to view <u>here</u>.

In accordance with the PLEDIS and FLDC, we equality monitor candidates at shortlisting stage who make it to offer stage. This is voluntary for the candidate but widely encouraged. This enables us to identify the diversity of applicants and compare with our current workforce equality data.

We work to ensure each external role is advertised across multiple recruitment channels, including the central jobs platform for the FLDC, and in the advert we make it clear that we are striving to recruit diverse candidates.

We partner with agencies when relevant to support our candidate attraction and mandate the provision of diverse shortlists.

We make sure interview panels are diverse wherever possible.

6. Wolves Recruitment Procedure

All those involved in recruitment and selection must comply with this procedure.

6a. Pre-Hire & Vacancy Approval

The Recruitment Specialist / HR team will work with the hiring manager to:

- Seek signed approval to recruit through the agreed process, with final approval given by the Executive Chairman and / or Technical Director
- Ensure salary benchmarking is reviewed by the Wolves Reward Specialist as part of the approval process. Salaries will be compared against the Premier League/external market data available at the time
- Review the job description and person specification to ensure that it is current, accurate
 and does not unfairly discriminate against any individual or groups (e.g. unfair clauses in
 person specifications). If any changes constitute a 50% change to a role, any existing
 employees must be consulted with in relation to the changes
- Ensure that the content of any advertisement does not discriminate against any individual/groups and is advertised through appropriate media channels to inform and attract a diverse talent pool.
- Ensure compliance with the recording, monitoring and auditing of all stages of recruitment as required

 Make arrangements for all applicants to receive the same information, which will be available in a range of formats

6b. Advertising

All external vacancies must be advertised on the Wolves website for a minimum of 1 week. In addition to the website, the vacancies will be advertised on several different portals including Women in Football, Total Jobs and the centralised Football Leadership Diversity Code jobs board. More specialist sites will also be used depending on role (e.g. specialist medical, senior leadership) to ensure a wide reach and diverse pool of applications.

Where vacancies are open to internal candidates only, these will be circulated via email to the 'Wolves All' distribution list.

Consideration should always be given to enhancing the diversity of our workforce. We welcome applications from women, individuals from Black and Minority Ethnicities, the LGBT community and anyone with a disability.

If there is a requirement to use a recruitment agency or another advertising platform, these costs will be picked up by the recruiting department. Only those on an approved supplier list will be used.

Any employees in a temporary cover or maternity cover position must go through the same application and interview process as any other external candidate in the event that the role becomes a vacancy.

6c. Shortlisting

It is the hiring manager's responsibility to ensure they shortlist only against the criteria on the person specification, and record decisions in enough detail to show why each applicant was/was not short listed. The Recruitment Specialist will have overview of shortlisting to ensure this process is being carried out correctly.

Wolves is committed to applying the principles of the 'Rooney Rule' and committed to interviewing a minimum of one male and one female Black, Asian or Dual-Heritage candidate (if applicants meet the job specifications).

Disabled applicants who meet all the essential criteria are guaranteed an interview, even if desirable criteria are used to supplement the essential criteria for non-disabled candidates. Applicants must only be rejected due to their application or performance at interview and not due to any reasonable adjustments that they may require.

6d. Assessment and Selection

It is the Recruitment Specialist and hiring manager's responsibility to ensure that assessment and selection methods, including interview questions and tests, are fair and related to the requirements of the criteria on the job description and person specification. The HR team/Head of Safeguarding can provide advice and guidance.

Candidates should bring evidence of their right to work in the UK to their assessment. A copy should be made and retained by the HR department.

A member of the HR Department must be involved in at least one interview stage.

For roles with specific safeguarding elements, the Head of Safeguarding or club Safeguarding Officer will attend at least one round of interviews.

A minimum of two panel members (relevant to the role) must be involved in any interview/assessment and the panel should aim to represent the diversity of the Club.

Interviews should be consistent, with all candidates asked the same questions on core areas relevant to the role and Club values. The Recruitment Specialist will provide an interview questions/scoring pro-forma to the panel prior to the interview, which should be completed and returned. A minimum of 3 constructive feedback points should be supplied for use when relaying feedback to candidates' post-interview.

Supplementary questions should be asked where appropriate to clarify 'gaps' in the candidates' application/CV, or responses to questions asked.

Interview questions must be objective and enable candidates to demonstrate how their knowledge and experience meet the key elements of the job.

For safeguarding roles, applicants will be required to undergo an interview to acceptable protocol and recommendations that includes questions relevant to Safeguarding Children.

For popular vacancies hiring managers should consider using telephone/video interviews as an extension of the shortlisting process to screen an initial long list.

Hiring managers/assessors are encouraged to use the interview as an opportunity to demonstrate to candidates how and why they would be welcomed into the Club. Hiring managers/assessors should be proactive in highlighting the Wolves Spirit Values and One Pack culture.

Assessment of disabled candidates should be based on their performance after reasonable adjustments have been made or specialist equipment provided.

The response to each question should be recorded in enough detail to show how the successful candidate was chosen. Recording this detail is the responsibility of the assessors taking part in the interview.

Having completed the interview process, the hiring manager and panel should: -

- consider candidates' responses to the questions individually;
- discuss any inconsistencies between panel members in the ranking of candidates;
- consider the references and the results of the separate assessment process (if used); and consider whether this support the appointment of the highest ranked candidate.
- When deciding between candidates of equal merit, adopt positive action where you can clearly identify there is a protected characteristic group that is under-represented.

All documentation should be forwarded and retained by the Recruitment Specialist/HR team at the end of the selection process. It should be apparent that fair selection procedures have been adhered to.

6f. Offering the Job

Offer the job to the most suitable candidate. Positive Action should be taken if the panel agree that two candidates are equal following the recruitment process.

Offers should be made verbally by the Recruitment Specialist and/or hiring manager and must be confirmed in writing as soon as possible.

We request a minimum timeframe of two weeks from offer to start date to ensure the relevant checks can be made and essential equipment ordered. This is a mandatory requirement.

The Recruitment Specialist will construct and send an employment contract and offer letter once a completed Notice of Staff Appointment form (NOSA) is provided by the hiring manager.

<u>6g. Feedback</u>

The hiring manager is responsible for providing feedback to the unsuccessful candidate(s) unless agreed otherwise with the Recruitment Specialist.

Due to the high volume of applications we receive, we will only provide feedback to candidates who enter our recruitment process and are part of a formal interview.

References, Right to Work / EU settlement and Other Checks

Safeguarding Roles

- Completion of a Self-Disclosure Form, which requires any applicant to declare past offences
- Verification of identity and eligibility to work in the UK / EU settlement documents
- Verification of professional qualifications
- Screening via the Disclosure and Barring Service / overseas criminal records check (where appropriate)
- Two references, including one regarding the applicant's most recent post working with children
- Registration with the appropriate professional body (if applicable)

Non-Safeguarding Roles

- Verification of identity and eligibility to work in the UK / EU settlement documents
- Verification of professional qualifications
- Two satisfactory references being received, one of which must be from the current/last employer.
- Registration with the appropriate professional body (if applicable)

6h. Documentation

The hiring manager should arrange for the collation and return of all documentation at the end of the selection process to the Recruitment Specialist for retention and filing and ensure that it is apparent that fair selection procedures have been adhered to. Please note, applicants can request copies of their interview notes under the Equality Act 2010.

6i. Onboarding

Prior to joining the Club, the Recruitment Specialist will remain in contact with new joiners to be on hand to answer any questions and ensure the new joiner feels welcomed.

It is important to welcome all new starters with a well-planned induction. Each individual should attend the Wolves Induction and every effort should be made to help the individual settle well and become fully operational as soon as possible.

The Head of Safeguarding will be made aware of all new joiners on a monthly basis to ensure the club's safeguarding protocols are shared with these individuals.

During the new joiner's first 6 months, there must be 2 probationary meetings between the joiner and their direct line manager. These meetings should take place at the 3 and 6-month markers. The HR team will be available to support the manager during these meetings.

6j. Recruitment Training

All hiring managers are asked to complete the club's recruitment best practice training to understand their responsibilities. The recruitment policy and processes should be adhered to when hiring for any vacancy within Wolves.

6k. New Joiner Training

All new joiners will receive first day materials in their inbox referring them to the club's safeguarding policies and procedures on how to report a safeguarding issue should they experience or encounter anything that needs reporting. This will also include copies of the Premier League safer working practice. All new joiners are asked to confirm they have read and understood this information during their first week at the Club.

All new joiners are required to complete a suite of e-learning modules including introduction to safeguarding and the PL safeguarding module.