



# SAFER RECRUITMENT AND SELECTION POLICY

## 1. Introduction

This policy aims to provide a clear framework for safely recruiting and selecting appropriately experienced and qualified staff and volunteers fairly and transparently.

The policy applies to anyone involved in recruitment and selection, as well as third parties who recruit and select on behalf of Luton Town Football Club Ltd (the Club) or the Luton Town Football Club Community Trust (the Trust); and to both internal and external candidates.

This policy covers the recruitment of full time, part time and casual colleagues across Luton Town Football Club, Academy and Community Trust. Differentiation is applied in the checks that are conducted related to role (regulated activity) but not in the overall process for safer recruitment.

## 2. Safer Recruitment

We recognise that anyone may have the potential to harm or abuse children or adults at risk in some way and are 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 expected duties of an applicant.

We follow EFL and FAW guidance on Roles in Football in respect of this and Keeping Children Safe in Education Part 3, EFL guidance and the CCOP guidance in respect of safer recruitment guidance. 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.

We are clear to all applicants whether the role that they are applying for is regulated activity.

Applicants will be required to undergo questioning in their interview relevant to safeguarding and our HR and Safeguarding leads are consulted for advice on questions to ask (safer recruitment attitudes and values).

For roles in regulated activity, we conduct at least one round of face to face interviews and at least one member of the interview panel will be trained in safer recruitment.



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

- Completion of an application form that elicits information regarding an applicant's past and identifies gaps in employment for discussion during interview
- 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 – worked abroad for 3 months or more)
- 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 Head of Safeguarding, HR Director and the hiring manager for the post and they will decide on the applicant's suitability for the role. An agreed process/template is in place for this to ensure consistency of decision making.

A job offer can potentially be withdrawn. In exceptional circumstances where 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.

### **Risk assessments**

If information arises during the recruitment and selection process that may impact the successful applicant's suitability for the role and/or to work with children or adults at risk, a formal, documented risk assessment must be conducted before a final decision is made. This assessment must be thorough, objective, and evidence-based to ensure a fair and defensible outcome.

The risk assessment process should include:

- Initial assessment – Reviewing the information received or disclosed in relation to the safeguarding risks associated with the role. This includes assessing the nature, seriousness, and relevance of the information.



- Meeting – If further assessment is necessary, meet with the applicant to gather further details, allow them to provide their account and present any mitigating information.
- Panel review – A designated panel must undertake the assessment, including the Head of Safeguarding and HR Director. The panel must evaluate all available information, any aggravating or mitigating factors, and determine whether additional safeguards, conditions, or the withdrawal of the offer is necessary.
- Documented and defensible decision-making – The risk assessment must be fully documented, detailing the information reviewed, the evaluation process, the decision made, and the justification for the decision.

### **3. Statement on The Recruitment of Ex-Offenders**

Having a criminal record will not necessarily bar a potential candidate from working with us; 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, we comply with the DBS Code of Practice and undertake to treat all applicants for positions fairly. We undertake 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.

Potential applicants need to check on the government website:

(<https://www.gov.uk/tell-employer-or-college-about-criminal-record/what-information-you-need-to-give>) to determine whether cautions / convictions should be disclosed as part of their application.

### **4. Equality, Diversity & Inclusion**

We are committed to ensuring that equality, inclusion, and diversity of opportunity is at the very heart of everything that we do to ensure we provide fair and non-prejudicial access to the services across the Club and the Trust. We uphold everyone's freedom of rights and choice to be different and aim to provide opportunities for everyone to succeed. It is the policy of the Club and Trust that no person, whether player, job applicant, employee, volunteer, or customer, shall be discriminated against.



We oppose all forms of unlawful and unfair discrimination, either direct or indirect, or harassment, on the grounds of the following 'protected characteristics': Age, Disability, Gender Reassignment, Marriage & Civil Partnership, Pregnancy & Maternity, Race, Religion or Belief, Sex and Sexual Orientation.

We are fully committed to the EFL Equality, Diversity & Inclusion Standards and will 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 and in any advertisements, we make it clear that we are striving to recruit diverse candidates (eg "*We welcome applications from women, individuals from Black and Minority Ethnicities, the LGBT community and anyone with a disability.*") We will ensure interview panels are diverse wherever possible.

Internal and external applicants are treated equally with the same recruitment and selection process applied to both. This includes consistent screening, shortlisting, interviewing, and vetting procedures (including references) to ensure fairness, transparency, and adherence to safer recruitment practices.

All successful applicants will attend the relevant safeguarding workshops and be given the club's safeguarding policies to read.

## **5. Recruitment and Selection Procedure**

All those involved in recruitment and selection for Academy roles; or roles involving interaction with children and vulnerable adults, must comply with this procedure.

### **Role description and person specification**

The role description outlines the key duties, responsibilities, and expectations of a position, while the person specification defines the essential and desirable qualifications, skills, experience, and attributes.

The role description and person specification help structure the screening process by providing clear criteria for shortlisting applicants. Additionally, during interviews, they guide questioning to objectively assess applicants' competencies and ensure alignment with the role's requirements. This structured approach enhances transparency, reduces bias, and supports the selection of the most suitable applicant based on merit.



The role description should clearly define the level of engagement with children and/or adults at risk and outline safeguarding responsibilities, justifying the required level of pre-employment vetting checks.

### **Pre-Hire & Vacancy Approval**

Consideration must be given at the point of discussing recruitment as to whether the role is a like for like replacement or if alternations to the role should be made to better meet the needs of the organisation.

The HR team will work with the hiring manager to:

- 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).
- 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
- Ensure a safeguarding statement is included to deter unsuitable candidates (unsuitable means those people who are unsuitable to work with children or vulnerable adults due to a prior behaviour)

### **Advertising**

- A safeguarding statement will be included in all adverts to deter unsuitable candidates.
- All external vacancies must be advertised on our website for a minimum of 1 week. In addition to the website, vacancies may be advertised on several different portals. 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.
- 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.
- All host families will go through the full safer recruitment process.



## **Application**

We ensure a consistent and transparent application process requesting a cover letter or statement explaining how applicants meet the role criteria, along with educational and employment history, explanations of any gaps, role-specific questions, a declaration of any personal connections, and a declaration of accuracy.

Consent will be sought via the application form to conduct lawful online checks about the candidate's use of social media and other publicly available material.

All candidates must complete an application form to ensure that all information is provided and that gaps in employment can be identified for discussion. The application form is built into the recruitment system used. If candidates wish they may also upload their CV alongside the application form.

## **Shortlisting**

- At least one member of the shortlisting panel must have received safer recruitment training in the last 3 years. Those who have not completed training must be appropriately briefed on key processes. A structured process must be followed, applying the same screening and selection criteria to all applications.

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. Applications should be carefully reviewed against requirements of the role. Gaps, inconsistencies, history of repeated changes of employment, safeguarding or other concerns identified should be noted and addressed at interview. Incomplete applications must be rejected or returned for completion.

Staff involved in the recruitment and selection process must declare if any shortlisted applicants are known to them in any personal or professional capacity. Where a potential conflict of interest exists, appropriate measures must be implemented to ensure fairness and transparency. This may include adjusting panel composition or limiting the staff member's involvement in decision-making to maintain the integrity of the process.





## Assessment and Selection

- In conjunction with the HR/Administration team, it is the 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/HR Director and Head of Safeguarding can provide advice and guidance.
- 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 our organisation.
- Interviews should be consistent, with all candidates asked the same questions on core areas relevant to the role and our values.
- Candidates will be given opportunity to disclose and discuss any prior convictions that may appear on the DBS.
- 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, 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 specific and academy leadership roles, applicants will be required to undergo an interview to acceptable protocol and recommendations that includes questions relevant to Safeguarding Children and Vulnerable Adults.
- We will sensitively explore any anomalies, discrepancies, gaps in employment or a history of repeated changes of employment identified in the screening and shortlisting process. It should be noted that there may be valid reasons for gaps in employment which should not impact recruitment decisions, for example, parental leave, caring responsibilities, mental or physical health reasons, travelling or studying.
- 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 panel taking part in the interview; these notes are then given to HR who will ensure appropriate storage in line with GDPR.

Examples of interview questions to assess knowledge and attitudes towards safeguarding can be found here: [here](#)

Consideration should be given to using an interview evaluation form with a scoring matrix for each applicant interviewed, documenting the questions asked, answers given, any relevant interview notes and scoring. Records should be securely retained for a period of at least six months.



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 supports the appointment of the highest ranked candidate.
- When deciding between candidates of equal merit, adopt positive action where the panel can clearly identify there is a protected characteristic group that is underrepresented.

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

## **6. Conditional Job Offers**

Offers should not be made verbally; but in writing by HR or the Hiring Manager as soon as possible. We recommend a minimum timeframe of two weeks from offer to start date, to ensure the relevant checks can be made and essential equipment ordered.

These include

- Two professional references will be required. References from friends or family members are not accepted. References will be sought directly from the referee, ensuring they are from a senior person with appropriate authority. All references will be scrutinised, and any concerns will be followed up before any appointment is confirmed.
- 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)
- Registration with the appropriate professional body (if applicable)

The HR/Administration team will construct and send an employment contract once the conditions of the offer have been met (including all necessary pre-employment checks for safer recruitment). Only then will a start date be confirmed.





## References

The successful applicant will be asked to provide details of at least two professional referees and consent to contact them. 'Open' references or testimonials provided by applicants will never be accepted.

Professional referees cannot be peers, colleagues, friends, or relatives. References from these individuals are considered character references.

It is important to note that policies vary with some organisations requiring all references to be processed through specific channels, for example, their human resources department. Professional referees should be senior officials or individuals authorised by their organisation to provide references. If it is not possible to obtain two professional references meeting these criteria, for example, school leavers, those with limited work experience, or self-employed individuals, consideration can be given to seeking character and academic references which should be assessed alongside other information obtained through the recruitment and vetting processes.

References should include specific questions regarding a candidate's suitability to work with children and/or adults at risk, including any safeguarding concerns. While some employers may only confirm employment dates, it is crucial to ask these questions to demonstrate due diligence and reinforce safeguarding practices. Even if no response is received to safeguarding questions, documenting the request ensures a record of appropriate checks made.

References must be verified to ensure their authenticity and to ensure the information provided in is consistent with the information provided by the applicant. This includes directly contacting the referee using an official email address or phone number rather than relying solely on written references. Any discrepancies or vague responses should be followed up to clarify concerns, particularly regarding an applicant's suitability to work with children and adults at risk. Verifying references is an important step in safer recruitment, helping to confirm employment history, assess potential risks, and demonstrate due diligence in the recruitment and selection process.

### References for internal applicants/promotions

We request two references (one external) for internal applicants or individuals promoted to another role internally when a change of line manager will occur.

In situations where the line manager remains the same as part of the internal application/promotion then only one external reference needs to be requested as a minimum.

When an internal promotion/role occurs for an individual but there is no change in the requirements or job specification of the role (for example an individual increases their hours in



an existing role from part-time to full-time) then the Club/CCO is not required to seek new references.

References sought for internal applications and promotions should be tailored to the new position being applied for and any attributes and suitability requirements of the new role which may differ to that of their existing position within the Club or the Trust.

### **Providing references**

Clubs/CCO's must have a clear, consistent reference policy that all staff are aware of. While line managers or colleagues may provide input on character and performance, all reference requests should be managed and issued centrally through HR to ensure accuracy and compliance with Club/CCO policies.

### **Prohibition Checks**

Prohibition checks are completed relative to the role that is being recruited for examples prohibition from teaching checks or disqualification from charities:

<https://www.gov.uk/guidance/automatic-disqualification-rule-changes-guidance-for-charities>

### **Social media /online checks**

KCSiE states that consideration should be given to conducting social media checks on publicly available online information to identify potential safeguarding and reputational risks. If social media checks are carried out, they should be conducted lawfully, proportionately, and consistently, with a clear focus on publicly available information relevant to the role applied for.

The applicant's consent must be obtained before any such checks are undertaken via the application process.

### **Decision**

Once all pre-employment vetting and suitability checks have been successfully completed and deemed satisfactory, the offer of employment can be formally finalised.

In cases where a conditional offer of employment is withdrawn due to concerns arising from the recruitment process, the applicant must be informed both verbally and in writing. The written notification should clearly outline the reasons for the decision, ensuring transparency.



## **7. Post Recruitment**

### **Feedback**

The hiring manager is responsible for providing feedback to the unsuccessful candidate(s) unless agreed otherwise with the HR/Admin team. Due to the high volume of applications we receive, we will only provide feedback to candidates who are part of a formal interview.

### **Documentation**

The hiring manager should arrange for the collation and return of all documentation at the end of the selection process to the HR/Admin team for retention and filing and ensure that it is apparent that fair selection procedures have been adhered to. (Applicants can request copies of their interview notes under the Equality Act 2010)

## **8. Onboarding**

Prior to joining the Club or the Trust, the HR/Admin team 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 will attend the a role specific induction and a role specific safeguarding 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 (or more frequently) to ensure the club's safeguarding protocols are shared with these individuals by HR.

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 6month markers and recorded on Hi Bob. The HR team will be available to support the manager during these meetings if required.

## **9. Maintenance of a Single Central Register (SCR)**

We are required to maintain a secure electronic system as a single central record, documenting all pre-employment vetting, suitability checks, and ongoing training and compliance monitoring. At a minimum, the single central record must include:

- Identity check
- Verification of the individual's right to work in the United Kingdom
- Confirmation of professional qualifications (where required)
- DBS checks (including international checks for individuals who have lived or worked outside the United Kingdom)
- Barred list check(s) (where required)



- Prohibition from teaching check (where required)
- Professional registration checks (where required)
- Commencement date
- Records of induction, safeguarding, and safer recruitment training attendance

HR manage the pre-recruitment process, repeat checks, and maintain the single central record, while safeguarding will oversee the quality assurance measures.

## 10. Recruitment Training

All hiring managers are required to complete Safer Recruitment training to understand and deliver their responsibilities with refresher training every 3 years.

## 11. Review

Next Review: January 2026

This policy will be reviewed at least every 3 years by the Head of Safeguarding and HR Director with any amendments and updates communicated to all staff and volunteers. By adhering to this Safer Recruitment Policy, the Club will ensure that it utilises best practice methods for the recruitment of staff and volunteers, with paramount consideration always given to the welfare of vulnerable adults, children and young people in its care.

## Flow Chart of Activity

