



Wolverhampton Wanderers Football Club

Safer Recruitment Policy

Introduction

Safer recruitment is a set of practices that helps employers ensure the most suitable individuals are recruited and appointed into the right positions.

The aims of this policy are to provide a clear framework for safely recruiting and selecting effectively, fairly and transparently; to ensure that the safeguarding and welfare of children and adults at risk is delivered at each stage of the recruitment and selection process; to ensure the principles of equality, diversity and inclusion are embedded throughout the employee lifecycle; and to ensure that the best, most experienced and qualified candidates are appointed into all vacancies.

This policy is to be reviewed/updated annually, and at such other times as new legislation or amendments relevant to safer recruitment take effect, in which case the policy will be updated at the earliest opportunity.

Recruitment is an important part of Wolves' growth and strategy as new recruits pave the future of individual departments and the overall business and Wolves brand. With this policy, we hope to ensure that those who are appointed to represent Wolves are the best candidates and positively embody the Wolves values.

Scope

This policy covers the recruitment and appointment of the club's employees (permanent (full time and part time) and casual workers) and volunteers, as well as those of the Wolves Foundation (and References to "Wolves" and/or the "club" in this policy should therefore be taken to include the Wolves Foundation, unless stated otherwise).

This policy does not form part of any individual's contract of employment (or other contractual relationship with the club), and we may amend it at any time. The current version of this policy can be found on the club's internal intranet or can be requested from the HR department at any time.

Principles and Purpose of 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. This policy intends to outline preventative measures that must be followed to reduce the risk of safeguarding concerns within the recruitment process.

All those involved within the recruitment processes (including but not limited to hiring managers) are responsible for ensuring the standards set out in this Safer Recruitment Policy are upheld. Those involved have a responsibility to make reasonable decisions about a candidate's suitability for a role including considerations of the pre-employment checks (including but not limited to the Disclosure and Barring Service (DBS), barred list checks, references and interview information).

The purpose of this policy is to ensure that each individual involved in the recruitment process (and, in particular, hiring managers):

- 🛡️ Understand Wolves' safer recruitment process (including their role in the process and any requirements this policy imposes on them) to ensure that the correct procedures are followed;
- 🛡️ Are aware of the risks associated with recruitment and how the safer recruitment process aims to mitigate them safely;
- 🛡️ Feel confident that they are able to recruit the most effective and suitable candidate;
- 🛡️ Are confident in planning recruitment, selection and interview processes for their relevant vacancies;
- 🛡️ Understand the importance of pre-employment checks and other safeguarding precautions;
- 🛡️ Understand Wolves' onboarding and probationary processes; and
- 🛡️ Recognise that safer recruitment does not conclude upon appointment, and that it is as equally important to uphold robust practices once an individual has been onboarded (for example, DBSs are renewed every three-years and workforce continuous development through CPD is encouraged).

Wolves is committed to appointing the best candidate for each job and providing equality and equity of opportunity for all. It is club policy to treat all job applicants, employees and workers fairly and equally, regardless of gender, race, nationality, ethnic or national origins, marital status, age, disability, sexual orientation, political or religious belief, background or family circumstances (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's Football Leadership Diversity Code (FLDC) and is a disability confident employer. Full details of Wolves' commitments can be found [here](#).

Pre-Employment Checks and References

All candidates offered employment with Wolves will be subject to satisfactory pre-employment checks. The level of DBS certificate required (if applicable) and other checks to be undertaken (including whether a prohibition check is required) will depend on the role and duties of the applicant in question.

Wolves follows the Premier League (or other appropriate football related) guidance on 'Roles in Football' to determine what DBS checks are required for particular roles, and we source external advice/guidance from our DBS/background check provider to determine the appropriate level of check for all positions.

Guidance for hiring managers on DBS checks for roles can be found on the club's SharePoint: [Working with Adults at Risk](#) / [Working with Children](#).

All prospective applicants and candidates are made aware of the appropriate pre-employment checks which will be carried out as part of the recruitment processes for the vacancy applied for and all candidates are expected to complete a self-disclosure as part of their application. The Wolves website 'Vacancies' page directs individuals to the Ministry of Justice website for advice on whether cautions/convictions should be disclosed as part of this process.

Individuals should not commence work at Wolves until all appropriate pre-employment checks have been completed to a satisfactory standard.

Should there be an urgent organisational need for an individual to commence work prior to the appropriate pre-employment checks being completed to a satisfactory standard, hiring managers can speak to the HR team and the club's Head of Safeguarding. The HR team and the Head of Safeguarding may agree to complete a risk assessment with the hiring manager with a view of mitigating any risks (including working with children and adults at risk unsupervised). The Risk Assessment would be presented to a safer recruitment/DBS panel (attended by the club's Master Disclosure Manager and members of the club's Safeguarding, Legal and HR departments), who will determine whether the employee can commence employment under restricted and supervised measures.

1. Roles with Safeguarding Duties and/or Responsibilities

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

- ✦ Completion of an application form, which elicits information regarding an applicant's past;
- ✦ Completion of a self-disclosure form, which requires any applicant to declare past offences and/or subject to FA referral processes;
- ✦ Verification of identity and eligibility to work in the UK/EU settlement documents;
- ✦ Verification of professional qualifications (as applicable);
- ✦ Screening via the Disclosure and Barring Service/overseas criminal records check (as appropriate);
- ✦ A minimum of two references, including one regarding the applicant's current/most recent employer – where the role involves significant contact with children, a reference must be sought from the most recent employer who has known the candidate working with children;
- ✦ Registration with the appropriate professional body (if applicable); and
- ✦ Online screening checks (if applicable for the role) in accordance with legislation.

If the DBS check reveals disclosed and/or undisclosed offences, or issues are raised in the references or other pre-employment checks, a risk assessment interview will be conducted with the applicant at the earliest opportunity, attended by a Disclosure Manager for the relevant department, along with the hiring manager for the post. The results of this interview will be presented to a safer recruitment/DBS panel (attended by the club's Master Disclosure Manager and members of the club's Safeguarding, Legal and HR departments), who will determine the applicant's suitability for the role.

A job offer can be withdrawn should the decision be made that satisfactory pre-employment checks have not been obtained and there is reasonable doubt for the candidate's suitability for the role following the risk assessment process and panel review.

2. Non-Safeguarding Related Roles

Pre-employment checks must still be carried out for roles which do not involve significant contact with children or adults at risk, or other safeguarding duties and responsibilities – these include:

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

A job offer can be withdrawn should satisfactory pre-employment checks not be obtained.

Recruitment of Ex-Offenders

Past criminal records/convictions will not necessarily bar a potential candidate from working with Wolves. In the event that a candidate discloses previous criminal records/convictions or these are included on the candidate's DBS referral, the necessary risk assessments and risk mitigatory measures should be followed (as set out above) and a decision will be made based on the nature of the position and the circumstances and background of the offence(s) committed.

As an organisation using the DBS to assess applicants' 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) states 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.

Points-based Immigration System

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

Recruitment and Selection Procedure

1. Pre-hire & Vacancy Approval

At the outset of each recruitment process, the club's Recruitment and Onboarding Manager/HR team will support the relevant hiring manager in:

- ✦ Obtaining signed approval to recruit in accordance with the club's applicable recruitment authorisation/approvals process (which includes completing a Recruitment Authorisation Form (or RAF));
- ✦ Reviewing relevant salary benchmarking – salaries will be compared against relevant competitive markets such as (but not limited to) other clubs within the Premier League (or in the case of the Wolves Foundation, other CCOs and the Premier League Charitable Fund), as well as other relevant external market data;
- ✦ Reviewing the job description and person specification to ensure that it is current, accurate and does not indirectly or unfairly discriminate against any individual or groups (e.g. unfair clauses in person specifications);
- ✦ Ensuring that the advertisement is clear, inclusive, and contains content that does not discriminate against any individual/groups and is advertised through appropriate media channels to inform and attract a diverse and wider talent pool;
- ✦ Complying with the club's recording, monitoring and auditing requirements at all stages of the recruitment process; and

- 🔗 Ensuring that all applicants receive the same information, made available in a range of formats.

2. Advertising

All external vacancies should be advertised on the Wolves website for a minimum of **1 week**.

Vacancies should also be advertised on other appropriate recruitment platforms and channels, including those designed to target diverse recruitment strategies and candidate pools (including the central jobs platform for the FLDC). Specialist sites and platforms should be used if appropriate for the role (e.g. specialist medical or senior leadership recruitment platforms) to ensure a wide reach and diverse pool of applications.

If there is a requirement to use a recruitment agency or another paid-for advertising platform, these costs will be picked up by the recruiting department. It is the hiring manager's responsibility to liaise with the HR department and Legal team to review any engagement letters or terms and conditions before any engagement is made. We welcome any recruitment supplier that has a mission statement to hire from a diverse talent pool.

Where vacancies are open to internal candidates only, these will be circulated via email to the relevant organisational distribution list.

3. Shortlisting

It is the hiring manager's responsibility to ensure they shortlist applicants only against the criteria on the person specification (without variation or exception) and that they record their decisions in enough detail to show why each applicant was/was not short listed (and this record will be used, if necessary, to defend a claim of discrimination). The Recruitment and Onboarding Manager or another member of the HR team will have overview of the shortlisting process and provide support to the hiring manager to ensure this process is carried out and recorded correctly.

Wolves are committed to ensuring that any candidate who meets the shortlisting requirements for a role, as set out in the job description, will be invited to an interview. This is encompassing of the principles of the "Rooney Rule", which means that we will interview at least one Black, Asian or Minority Ethnic (BAME), and includes any candidate with a protected characteristic and/or diversity that applies for a role. Hiring managers (with the support of the Recruitment and Onboarding Manager and/or another member of the HR team) will ensure reasonable adjustments are considered and facilitated to support any candidates with diversities throughout the recruitment process.

In accordance with the PLEDIS, FLDC and the Club's Equality, Diversity and Inclusion (EDI) objectives, we equality monitor candidates at shortlisting stage. This is voluntary for candidates but widely encouraged. This enables us to identify the diversity of applicants and compare with our current workforce equality data.

4. Assessment and Selection

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.

It is the Recruitment and Onboarding Manager, HR team 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 Recruitment and Onboarding Manager and HR team can provide advice and guidance on interview strategies and other assessment tools as required.

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

Where candidates have detailed that they require any 'reasonable adjustments' or 'access requirements' to support them in participating in the recruitment and selection process, this should be discussed in advance of the interview and any assessment. Advice can be sought from the HR team on this matter as required. Assessment of candidates with disabilities should be based on their performance after reasonable adjustments have been made or specialist equipment provided.

a. Interview Panels

- ✦ A minimum of two panel members (relevant to the role) must be involved in any interview/assessment for contracted workers and the panel should aim to represent the diversity of the Club.
- ✦ A member of the HR team must be involved in at least one interview stage.
- ✦ For any role with a specific safeguarding element, the Head of Safeguarding or a Designated Safeguarding Officer will attend at least one round of interviews.
- ✦ We endeavour to ensure that the interview panel is reflective and representative of the Club's EDI objectives and the candidate applying for the position.

b. Interview Process and Questions

- ✦ Interviews should be consistent, with all candidates asked the same questions on core areas relevant to the role and club values. Interview questions must be objective and enable candidates to demonstrate how their knowledge and experience meet the key elements of the job.
- ✦ Supplementary questions should be asked where appropriate to clarify 'gaps' in the candidates' application/CV, or responses to questions asked.
- ✦ Every interview should include at least one question relating to safeguarding children and adults at risk – the club's Head of Safeguarding or other members of the Safeguarding team can provide guidance on appropriate questions relevant to each job role.
- ✦ Every interview should include at least one question relating to the candidates understanding of EDI – the club's EDI Manager or other members of the HR team can provide guidance on appropriate questions relevant to each job role.
- ✦ Candidates' responses 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 members taking part in the interview.

- ✦ The Recruitment and Onboarding Manager will provide an interview questions/scoring proforma to the panel prior to the interview, which should be completed and returned. A minimum of three constructive feedback points should be provided, for use when relaying feedback to candidates post-interview.
- ✦ Hiring managers/assessors are encouraged to use interviews as an opportunity to demonstrate to candidates how and why they would be welcomed into the club.
- ✦ Candidates should be asked to bring evidence of their right to work in the UK to their assessment for visual checking.

c. Other Assessment Tools

Tests may be used to demonstrate skills and abilities which cannot be better tested with interview questions. These may include a written exercise or giving a short presentation.

d. Selection

To select the successful candidate, the hiring manager and other interview panel members should (as soon as possible after having concluded the interview process):

- ✦ Consider each candidate's responses to the questions individually, and rank the candidates;
- ✦ Discuss any inconsistencies between panel members in the ranking of candidates;
- ✦ Consider the results of any separate assessment process (if used); and
- ✦ When deciding between candidates of equal merit, adopt positive action where an under-represented protected characteristic group can be clearly identified.

A record of the decision-making to appoint should be noted, to ensure that there is a record to provide feedback to the unsuccessful candidate(s) if required. All documentation should be collated by the hiring manager and forwarded and retained by the Recruitment and Onboarding Manager/HR team at the end of the selection process. It should be apparent that fair selection procedures have been adhered to. Please note, applicants can request copies of their interview notes under the Equality Act 2010 and under data protection legislation.

5. Offering the Job

Should a suitable candidate for the role be identified during the recruitment process, they will be offered the position.

The Recruitment and Onboarding Manager and/or another member of the HR team and the hiring manager will agree who will be responsible for contacting the successful candidate to verbally offer the position. A verbal offer must be confirmed in writing as soon as possible. Please note that a verbal offer of employment is recognised as legally binding.

The Recruitment and Onboarding Manager and/or another member of the HR team will construct and send an employment contract and offer letter once a completed and signed Notice of Staff Appointment form (or NOSA) is provided by the hiring manager.

Any verbal and/or written offers must state that it is a conditional offer of employment and remains subject to the receipt of all satisfactory pre-employment checks and therefore compliance with this Safer Recruitment Policy. All offers of employment can be withdrawn where these are not obtained.

Following acceptance of the offer of employment by the successful candidate, the appropriate pre-employment checks (as detailed above) will be facilitated. Neither the Recruitment and Onboarding Manager nor any other member of the HR team can guarantee how long pre-employment checks will take to complete, as they are dependent on external organisations and individuals.

Should the successful candidate decline the offer of employment, the hiring manager, Recruitment and Onboarding Manager and/or another member of the HR team and other members of the interview panel must reconvene to consider any reserve candidates.

6. Feedback

The Recruitment and Onboarding Manager and/or another member of the HR team and the hiring manager will agree who will be responsible for notifying and providing feedback to the unsuccessful candidate(s).

Due to the high volume of applications received by Wolves, feedback will only be provided to candidates who enter our recruitment process and are part of a formal interview process.

7. Onboarding

The Recruitment and Onboarding Manager and/or another member of the HR team will remain in contact with onboarding candidates prior to them commencing their employment, to support with and answer any questions and ensure they feel welcomed.

It is the hiring manager's responsibility to arrange equipment (including kit, IT and office space/equipment) is ordered and arranged for each new starter.

All new starters must attend a well-planned induction, and every effort should be made to help the individual settle well and become fully operational as soon as possible.

The hiring manager must ensure that the Head of Safeguarding or relevant Designated Safeguarding Lead is made aware of any new starters with safeguarding responsibilities/associated duties.

All new joiners will receive first-day materials in their inbox, providing them with the club's safeguarding policies and procedures, including information 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's safer working practice.

8. New Joiner Training

All new starters are required to complete a suite of e-learning modules, which includes an "Introduction to Safeguarding" course. If appropriate to the individual's role, they may be required to

undertake relevant Premier League and/or The FA safeguarding training – guidance on this can be obtained from the Head of Safeguarding and/or relevant Designated Safeguarding Officer.

9. Probation

During a new starter's first six months at Wolves, there must be two probationary meetings between the individual and their direct line manager. These meetings should take place at the three- and six-month markers. The HR team will be available to support the manager during these meetings upon request.

These meetings should be used as an opportunity to assess the new starter's understanding and awareness of the club's safeguarding policies and procedures – guidance on this can be obtained from the Head of Safeguarding and/or relevant Designated Safeguarding Officer.

Recruitment Training

All hiring managers are asked to complete the club's recruitment best practice training to understand their responsibilities. Managers must adhere to the procedures and expectations outlined within the training and this Safer Recruitment Policy for all recruitment processes within Wolves.

Casuals

The recruitment process for casuals is the same as outlined for employees including pre-employment checks as detailed above (depending on whether their role will involve significant contact with children or adults at risk, or other safeguarding duties and responsibilities or not) (e.g. appropriate DBS checks, references). The only difference in the recruitment processes is that it might be appropriate to hold one interview rather than two. This decision should not be made without prior consultation with the HR team.

All casuals are expected to comply with the club's safeguarding policies and procedures.

For more information on the club's use of casuals (including, without limitation, the recruitment, selection and engagement process) please speak to a member of the HR team.

Volunteers

All volunteers recruited or engaged to work with the club will be subject to the same pre-employment checks as detailed above (depending on whether their role will involve significant contact with children or adults at risk, or other safeguarding duties and responsibilities or not) (e.g. appropriate DBS checks, references). All volunteers are expected to comply with the club's safeguarding policies and procedures. Additionally, similar to casual roles, it might be appropriate to hold one interview rather than two. This decision should not be made without prior consultation with the HR team.

For more information on the club's use of volunteers (including, without limitation, the recruitment, selection and engagement process) please speak to a member of the HR team.

Host Families

Wolves follows a safer recruitment process for recruiting host families for Academy players which is managed through the Academy. Details can be obtained from the Safeguarding team and/or Player Care team.

Other Workers (Self-Employed Contractors/Consultants and Staff Employed by Contractors/Service Providers/Agencies)

Any self-employed staff (e.g. consultants/freelancers) (whether the individual is engaged directly or through a personal services company) will be subject to the same pre-employment checks as detailed above (depending on whether their role will involve significant contact with children or adults at risk, or other safeguarding duties and responsibilities or not) (e.g. appropriate DBS checks, references, professional qualifications). The same restrictions on individuals commencing work at Wolves before all appropriate pre-employment checks have been completed to a satisfactory standard apply as are detailed above. All self-employed staff are expected to comply with the club's safeguarding policies and procedures (and the requirement for them to do so will be detailed in their written contract of engagement with the club).

Where individuals employed or otherwise engaged by a third-party contractor/service provider (including through an agency) provide services to the club (e.g. the club's catering partner, the club's cleaning services provider and agencies who provide matchday stewards), relevant safeguarding and safer recruitment requirements should be set out in the written contract for services between the club and that entity (including without limitation as to the requirement to undertake appropriate levels of DBS on personnel and other pre-employment checks to be carried out on personnel involved in the provision of services to the club). The Legal department will take advice from the club's Head of Safeguarding on appropriate contractual provisions to be included in each such contract.

Reviewed and approved by the Wolves Policy Review Group on Wednesday 23 October 2024.

The Wolves Policy Review Group is a cross-organisational working group comprising relevant stakeholders from across the football club and Wolves Foundation, including from the club's Football Administration department, Legal and Safeguarding teams, HR department (including Equality, Diversity and Inclusion) and Media department.