



## SAFER RECRUITMENT POLICY

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As part of Bolton Wanderers Football Club, Safeguarding Children Policy, we recognise the importance of safeguarding and protecting children and young people. An important element of this is ensuring that we recruit the best people for roles working with children and young people across the Club through a safer recruitment process, which is supported by the Club's Recruitment Policy. This policy applies to all roles across the organisation.

The purpose of this policy is to ensure that Safer Recruitment is embedded in all aspects of the Club's operations, supporting our long-term safeguarding strategy and core values by promoting a safe working environment and positive safeguarding culture. All BWFC staff hold positions of trust and influence, and must recognise that the welfare of children and adults at risk is paramount. Safeguarding is everyone's responsibility, and all staff are expected to act with respect, dignity, and a commitment to equality and anti-discriminatory practice. Staff must also understand and comply with all relevant safeguarding policies and procedures, including this policy, LADO guidance, EFL requirements, and the Club's Whistleblowing Policy.

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## Safer Recruitment Policy

### **DBS Checks**

#### **Who requires a DBS check?**

In line with the Safeguarding Policy, 'regulated activity' is defined as follows:

Teaching, training, instructing, caring for or supervising children or providing advice on well-being or driving only for children.

The above happens frequently (once a week or more) or happens intensively on 4 or more days in a 30 day period, or overnight.

The individual carrying out the activity of teaching, training instructing is unsupervised

All staff and volunteers having access to and working with children and young people are required to supply two references and carry out a DBS. Internal candidates (who will experience a change in line manager through their new role) must provide one reference. Enhanced references will be requested for any role that involves regular access to children.

#### **Whose responsibility is it to identify who requires a DBS check?**

- This is the responsibility of the Line Manager / Recruiting Officer
- If you feel the role falls into the above then you must follow the below:

#### **Steps to take at Recruitment stage:**

- Prior to starting the process you will need to identify if the role falls into the 'regulated activity'
- If you have any concerns identifying this then seek further guidance from the Senior Safeguarding Manager or Designated Safeguarding Officer Lead.
- You will need to consider the interview stage and exploring the applicant's suitability.
- During interview you will need to discuss and make the applicant aware that a DBS is required.
- Once the appointment is made and without delay the applicant will receive an email from GBG online; from here the applicant will be asked to complete the online application. The applicant will then be asked to provide 3 forms of ID, (to include their full name, address and date of birth). The same ID will then be required for the club's verifiers to confirm and sign off. A certificate

will be sent through to the applicant in due course. The original needs to be brought into the club for confirmation.

- Individuals awaiting DBS clearance may only work under direct, constant supervision by a DBS-cleared staff member and must not engage in regulated activity.
- If they have a current DBS (issued within the last month) then this can be submitted and in place to cover whilst we are applying for one ourselves.
- While DBS certificates do not legally expire, the Club requires renewal every 3 years as part of safeguarding best practice.
- Ongoing checks – Within this 3 year period, each year those with a DBS check will be required to sign a declaration to confirm that nothing has changed. The Database Administrator as administrator will flag to the Designated Safeguarding Officer of that area each month when these are due.

### **Job design, adverts and role profiles**

All role profiles that involve children/adults at risk must include:

- Clear safeguarding responsibilities and the expectation to maintain professional boundaries and position of trust.
- A statement that behaviour outside work may impact suitability to work with children and adults at risk.

You can strengthen advert wording by including:

- “References will specifically address suitability to work with children and adherence to safer working practice.”
- “Online and social media presence may be reviewed where proportionate and lawful, where there are safeguarding concerns about conduct or views inconsistent with Club values.”
- Shortlisting panels consider unexplained gaps, frequent moves, or patterns that may indicate risk, and that these must be explored at interview.

### **Pre-employment checks and DBS**

- Clarify DBS and barred-list expectations using EFL safer working emphasis on roles of trust:
- State that roles in regulated activity or position of trust require enhanced DBS with barred list check prior to any unsupervised contact or regulated activity.
- Explicitly reference that it is illegal for staff in a position of trust to engage in sexual activity with 16–17-year-olds in their care and that such conduct is gross misconduct and will trigger statutory referrals. This is reminded through club Safeguarding Training.

### **Add a short DBS risk assessment section:**

- Where positive disclosures arise, outline a structured risk assessment process with Head of Safeguarding, People Team and line manager, considering nature, age and pattern of offences and relevance to role.
- Embed an **ongoing suitability** requirement:

- Annual self-declaration of any new investigations, arrests, charges, convictions or safeguarding concerns, alongside the existing declaration about DBS changes.
- Reference to the Club's expectation that staff report any behaviour or allegation that may call their suitability into question (including behaviour outside work).

## Interviews

### Interview Questions

The use of appropriate questions which link safeguarding to the purpose of a vacancy ensures that applicants are aware of the Club's obligation to safeguarding but in addition, ensures that those applicants who are not suitable to work with children and young people are identified. Below are a series of appropriate questions, with anticipated answers, for applicants applying for general posts and those applying for specific managerial roles.

A directory of example interview questions relevant to the role you are recruiting for, in addition to guidance on anticipated answers, can be obtained by contacting the Head of Safeguarding directly.

### Interpretation of References

On receipt of two references for an external candidate (or one reference for an internal candidate), checks should be made that all questions are answered satisfactorily. A follow-up telephone call to the referee should be made to confirm their identity. Questions not answered or which were vague should be followed up during the call if necessary. References should be checked for consistency with the application form. Details / discrepancies from references should be discussed with the applicant. Information about past disciplinary actions or allegations should be considered.

### Authority to Recruit

All new roles must receive formal approval prior to advertising. Approval must be documented on the Authority to Recruit form and signed by the relevant Department Lead, Group Head of People, and the Chief Executive Officer.

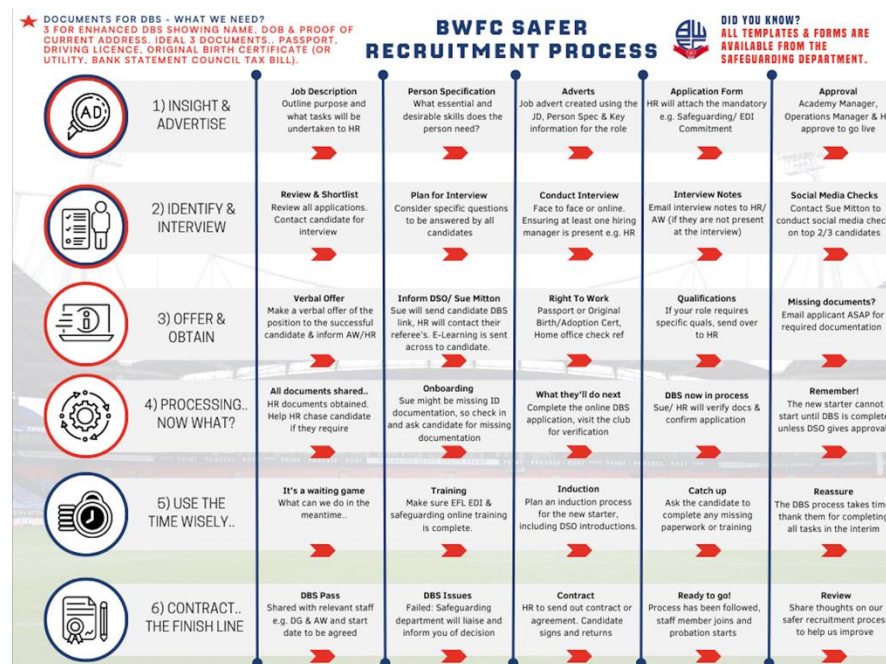
Blank Authority to Recruit forms are available in The Dugout under *Employee Documents > Human Resources > Recruitment Processes* or can be obtained directly from the People Team.

### Formal Offers for New Starters

All formal offers of employment are conditional and subject to the completion of the organisation's Safer Recruitment procedures.

It is the responsibility of the Line Manager to ensure that all elements of this process have been fully completed prior to a candidate commencing employment. No

candidate may begin work until the Line Manager is satisfied that all necessary checks and requirements have been satisfactorily completed.



## Safer culture and professional boundaries in recruitment

Interviews and references must test candidates' understanding of:

- Power imbalance and position of trust.
- Maintaining professional boundaries (e.g. social media, one-to-one, physical contact, gifts, transport).
- Require that all interview panels for regulated roles include at least one safeguarding-trained panel member who can probe safer working scenarios (e.g. lone working, managing infatuations, responding to poor practice).
- Appointment and induction will be used to reinforce expectations around behaviour of staff and volunteers, creating a safe environment, supervision and ratios, lone working, transport, communication and managing images/filming.

## References, red flags and decision making

Recruiting Staff will include specific questions on conduct, boundaries, reliability with safeguarding procedures, and any concerns about suitability to work with children/adults at risk, including substantiated allegations or patterns of poor practice.

BWFC Management will Instruct recruiting managers to treat indicators such as favouritism, boundary-blurring, "maverick/ Rogue" behaviour, or unwillingness to follow procedures as safeguarding red flags.

Safer Decision Making:

- Where risk indicators exist but are not conclusive, record a safeguarding-led recruitment decision including rationale, additional controls, balance of probability and any probation conditions.

### **Induction, training and supervision**

Mandatory safeguarding and safer working practice induction in place for all new starters before unsupervised contact, covering key topics: conduct, boundaries, lone working, transport, images, communication, dealing with disclosures, recording and reporting.

- Role-specific training is in place for high-risk roles (coaching, medical, education, host families, Management and transport) to include supervision ratios, safe use of changing facilities, trips/visits and online safety.

### **Probation and early supervision:**

New Staff require enhanced supervision and observation of practice during probation, focusing on boundaries, language, behaviour management and adherence to Club codes of conduct. There is a quality assurance process across the club to embed this into routine practice.

### **Allegations against Staff**

Any concerns, complaints, or allegations made against a member of staff or volunteer relating to the safety or wellbeing of children must be reported immediately to the Head of Safeguarding. If you cannot report to the Head of Safeguarding directly, they should be directed to a Designated Safeguarding Officer (DSO) or the Group Head of People.

All allegations will be treated seriously, handled confidentially, and referred promptly. Where appropriate, external agencies such as the Local Authority Designated Officer (LADO), the Police, or other statutory bodies will be consulted in accordance with statutory guidance.

No individual subject to an allegation will be permitted to continue in regulated activity until a full risk assessment and safeguarding decision has been completed.

### **Whistleblowing**

The Club is committed to fostering a culture of openness, accountability, and safeguarding vigilance. Staff, volunteers, and contractors are encouraged to raise concerns about unsafe practice, poor conduct, or safeguarding risks without fear of reprisal.

Concerns should be raised in accordance with the Club's Whistleblowing Policy, which provides clear procedures for reporting safeguarding concerns about colleagues,

management, or organisational practices. Any individual who raises a genuine safeguarding concern will be supported and protected from victimisation. Failure to report safeguarding concerns may be treated as a disciplinary matter.

## **Safeguarding Training**

All staff, volunteers, and individuals engaged in work with children and young people must complete safeguarding training as part of their induction.

Safeguarding training must be refreshed at least every three years, or more frequently where required by statutory guidance, role responsibilities, or identified organisational risk.

Managers are responsible for ensuring that safeguarding training compliance is monitored, recorded, and maintained. Staff who fail to complete required safeguarding training may be restricted from working with children until training requirements are met.

Safeguarding training will include, but is not limited to:

- Recognising signs of abuse or neglect
- Reporting safeguarding concerns
- Professional boundaries and appropriate conduct
- The Club's safeguarding policies and procedures
- Online safety and child protection responsibilities

## **Safer Recruitment Best Practice**

When recruiting staff or volunteers to work with children, always remember to follow recruitment best practice. This means:

- All candidates for any advertised role must complete a written application
- Application forms should include all relevant information and make clear that references will be sought after the offer of employment is made.
- Advertisements should include a statement of the Club's commitment to safeguarding. The current statement is *"Bolton Wanderers Football and Athletic Club, is an Equal Opportunities Employer and recognises the importance of safeguarding children and vulnerable adults in our work place."*
- Advertisements should say that successful candidates will need to have an Enhanced DBS check.
- During the shortlisting process, make a note of any discrepancies such as gaps in their employment history to raise with the individual if they are short-listed for interview.
- Interview panels should have at least two members.
- Interviews should explore the candidate's suitability to work with children.
- Ideally being able to look at original documents when checking the candidate's identity and qualifications.

- Only a verbal offer will be made whilst a DBS check is done, and the offer of employment will be subject to a DBS check coming back within the probationary period at the latest. This is expected for volunteer roles as well.

It is expected that no post will be offered until the following has been confirmed:

- The candidate has permission to work in the UK
- Barred list checks must be completed before any regulated activity begins.

## Work Placement Process Guidance

### Work Placement Process



## Recruitment of Ex-Offenders

Bolton Wanderers Football Club, will consider applications from relevant and suitable applicants for each vacant position, and will treat DBS applicants who have a criminal record fairly and will not discriminate automatically because of a conviction or other information. For further information please speak to the Designated Safeguarding Officer and/or the Head of Safeguarding of the Club.

The FA's Policy Statement can be found by clicking on this link in your browser

[http://www.eeyfl.co.uk/files/The FAs Policy Statement on the recruitment of Ex-Offenders.pdf](http://www.eeyfl.co.uk/files/The_FAs_Policy_Statement_on_the_recruitment_of_Ex-Offenders.pdf)

### **Monitoring and Review**

We commit to annual review of safer recruitment practice using learning from allegations, concerns, audits and changes to EFL/FA or statutory guidance.

Group Head of People: *D Heap*

Head of Safeguarding: *G Shaw*

Date: February 2026