

TOTTENHAM HOTSPUR

SAFER RECRUITMENT POLICY

INTRODUCTION

This Safer Recruitment policy (“policy”) applies to Tottenham Hotspur Football and Athletic Co. Limited (known as ‘the Club’) and to its Group Companies, Tottenham Hotspur Football Club (trading name), Tottenham Hotspur Foundation (a registered charity – known as ‘the Foundation’) and Tottenham Hotspur Women Football Club Ltd. Any references to ‘the Club’ are therefore intended to apply to the Club, any of its Group Companies, including the Foundation and to the Tottenham Hotspur Women’s team.

This Safer Recruitment policy aims to ensure an effective recruitment and selection process is in place to help discourage and prevent individuals who are not suitable to work with children and/or adults at risk from securing roles whereby they can cause harm, therefore, creating a safe and positive work environment and ensuring that all staff members, whether paid or voluntary, are suitable for a position working with children and/or adults at risk. The Club believes that children, young people, and adults at risk have the right to take part in sport in an environment which is safe and free from any risk of abuse.

This policy is mandatory for any role which requires an Enhanced DBS check with the Child’s Barred List and/or the Adult’s Barred List. This policy includes all staff types, including those who are paid and unpaid, those who are permanent, fixed-term, and casual staff, and consultants. It must also be reflected in the recruitment of agency staff and external third-party suppliers and must be stipulated within the Service Level Agreement (SLA) requirements.

This policy should be read alongside the Club’s Recruitment Policy.

PLEASE NOTE: At least one of the hiring managers responsible for the recruitment of a role that requires a Safer Recruitment process must have completed the Safer Recruitment training. If you have not undergone the Safer Recruitment training, please contact the HR Department or Head of Safeguarding who will schedule the appropriate training session.

The Safer Recruitment policy and workflow is a continuing process of improvement therefore this policy will be reviewed to ensure the process remains effective and complies with the latest legislation and best practice. Please ensure the most updated policy is adhered to. The most recent copy of the policy will be available on the employee intranet (“The Shelf”).



DEFINITIONS

Alternative Worker – Engagement with the Club, which is not based on an open-ended and continuous employment contract. This includes but not limited to, casual workers, freelancers, volunteers, work experience students and consultants.

Barred Person – An individual who is barred from working with children and/or adults at risk in regulated activity.

Candidate – Prospective individuals who are applying or active in a live recruitment process.

Child / Children – An individual who is under the age of 18.

Adult at risk - Any person aged 18 years and over who is or may be in receipt of care services by reason of mental health issues, learning or physical disability, sensory impairment, age, or illness and who is or may be unable to take care of him/herself or unable to protect him/herself against significant harm or serious exploitation

Disclosure Manager – An administrator or manager who confirms the ID of a candidate, employee, or alternative worker.

DBS Check – The disclosure and barring service for a criminal record check which details any cautions, warnings, reprimands, or convictions on an individual's criminal history and checks against the children and/or adults barred lists.

Hiring Manager - The hiring manager is the employee who requested and will be responsible for their new role which requires a recruitment process.

Centre Circle – Applicant tracking system (“ATS”) software application that enables the electronic handling of recruitment and hiring needs.

Positive information – A DBS certificate containing information relating to criminal or other relevant offences.

Regulated Activity – Frequent work carried out by the same staff member whereby they are close and have regular contact with children or adults at risk, i.e. Physiotherapist who regularly would be in contact with Academy Players.

Recruitment Agency - An employment agency is an organisation that, for payment, matches employers to employees for a fee.

Recruitment Department – The internal Recruitment function that supports the Club with all recruitment requirements for all employees and alternative workers including but not limited to identifying, attracting, and selection of candidates to fill the Club’s roles.

Risk Assessment Panel – Multi disciplinary team comprising of the HR Director, Head of Safeguarding & Welfare and relevant Line Manager who are responsible for assessing positive information on an employee’s/prospective staff DBS check and the level of risk which a candidate, employee or alternative worker may pose to children and adults at risk will be assessed.

Role – Vacant need for headcount which is being recruited / filled.

The Shelf – The employee intranet which is accessible to all Club employees.

SLA – A service-level agreement (SLA) is an agreement between a service provider and the Club in regard to what services the provider will deliver and defines service standards the provider is obligated to meet.



Successful candidate – A candidate who has undergone a recruitment process and has been offered a conditional job offer.

Third Party External Agency – External independent staffing providers that act as a third-party services supplier which provides staff e.g. Cleaning, Security etc.

RAF – recruitment authorisation form – a form to ensure that all relevant parties are notified of any upcoming recruitment, be it for a like-for-like replacement or for a new role, thus ensuring appropriate sign-off and smooth logistics.

WHEN DOES THIS POLICY APPLY?

This policy applies to all roles within regulated activity which involve working with children and/or adults at risk on a full-time, or part-time basis or an alternative worker. Whether DBS checks are undertaken has to do with the job role, and not the type of contract the member of staff has with the Club.

Regulated Activity

ACTIVITIES	TIME PERIOD FOR REGULATED ACTIVITY	EXAMPLES OF ROLES (N.B not an exhaustive list)
Teaching, instructing, supervising, training, and coaching children.	Carried out by the same person frequently (such as once a week or more), 3 or more days in a 30-day period, or overnight (between 2am and 6am).	<ul style="list-style-type: none"> Academy Coaches Development Coaches Academy Scouts Academy Recruitment
Delivering care, including physically helping children including health, personal and medical care.	The individual is required to do this only once.	<ul style="list-style-type: none"> Academy Physiotherapist Academy Coaches Doctors Sports Scientist Strength and conditioning coach
Providing advice or guidance wholly or mainly for children's physical, emotional, or educational wellbeing.	More than 3 days in a 30-day period OR once overnight between 2am & 6am with the opportunity for face to face contact with children	<ul style="list-style-type: none"> Sports psychologists Physiotherapists Coaches Nutritionists Safeguarding officers Academy Scouts
Driving a vehicle in which children travel, such as a school bus or coach.	Carried out by the same person 3 or more days in a 30-day period.	<ul style="list-style-type: none"> Academy Drivers Kit & Laundry technicians
Moderating a web service wholly or mainly for children	Carried out by the same person 3 or more days in a 30-day period	<ul style="list-style-type: none"> Academy Operations Manager Academy Admin Academy Performance Analysis

If the required role falls into any of the above categories, it is mandatory that the Safer Recruitment policy is adhered to, and all steps included in this policy must be followed.

Specified Establishments

Our Training Centre is a 'Specified Establishment'. A Specified Establishment must have full-time education exclusively or mainly to children. This means that more than 50% of the student body are under the age of 18. Our young people engaging in full-time education at the Training Centre are predominately aged 16 and 17.



Staff working in a Specified Establishment in ancillary roles, e.g. cleaners, admin etc. could be in regulated activity with children if they meet the following criteria:

- they work there on more than three days in a 30-day period, or once overnight between 2am and 6am with the opportunity for face-to-face contact with the children and
- they have the opportunity, because of their job, to have contact with children in the establishment and
- they work there for the purpose of the establishment and
- it's not a supervised volunteer role

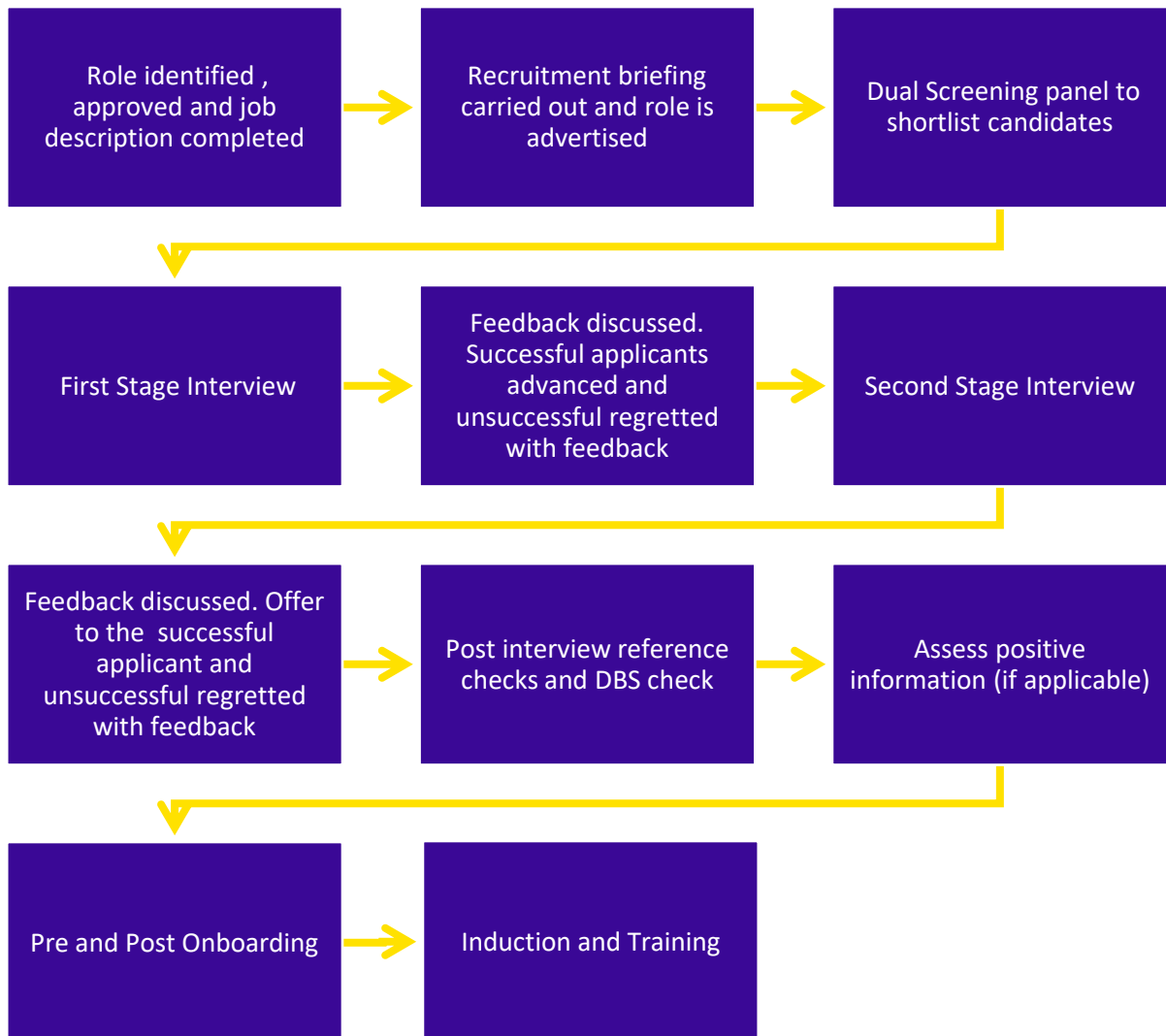
These staff would require an Enhanced DBS + Children's barred list. For ancillary staff who do not meet the above criteria, they would require an Enhanced DBS check only.

For further clarity and guidance on roles which are within regulated activity within a specified establishment, please contact either Recruitment or the Safeguarding Department.

THE SAFER RECRUITMENT PROCESS

It is the responsibility of the Recruitment Department and the Hiring Manager to ensure that;

- The Safer Recruitment policy is carried out on **all** roles that involve working within regulated activity.
- All third-party external agencies and recruitment agencies are compliant with this policy and have incorporated the Club's process into any SLA's and is fully understood, implemented, and may be audited at any time.
- All roles, including those that requires a safer recruitment process will need to follow a sign off process. Please see the Recruitment Policy for further information.



APPROVAL PROCESS FOR DIFFERENT WORKER TYPES

Depending on the employment type, the role must be approved in advance of any live recruitment commencing. For further guidance, please see the Recruitment and Retention Policy.

JOB SCOPE, DESCRIPTION AND PERSON SPECIFICATION

In addition to the guidance in the Recruitment Policy for writing Job Descriptions, the below must be included for Safer Recruitment;





The job description should clearly set out the extent of the relationship with, and the degree of responsibility for, children with whom the person will have contact. It must also refer to the responsibility for safeguarding and promoting the well-being and welfare of children and young people as well as clearly and accurately setting out the duties and responsibilities for the role.

The person specification section must include a specific reference to an applicant's suitability to work with children and young people. All applicants will be assessed equally against the criteria contained in the person specification without exception or variation.

Please note that all our advertised job roles will state whether the role requires a DBS check and to what level DBS will be carried out. There is mandatory wording that must be included at the end of every job description for roles that require a DBS check. This has been standardised for all job roles. The wording is included on the job description template available on the Shelf.

BRIEFING

All Safer Recruitment roles must undergo a briefing with the Recruitment Department. A briefing document is required so that the role can be discussed prior to the vacancy being advertised. The briefing document will set clear expectations for those involved in the process. It will also ensure that the criteria for the role is captured for example, which recruitment platforms the vacancy will be advertised on, or any “killer questions” on the application form.

It is important in the briefing of the role to identify and agree who the interview panel will be for the recruitment process. This must be agreed in advance to ensure a fair and consistent process throughout. Hiring Managers are to be reminded that at least one of the interviewers on the panel must have completed the Safer Recruitment training.

Please see the Shelf for an example of a briefing document.

ADVERTISING & APPLICATION FORMS

For all roles, the Recruitment Department will post the role on Centre Circle (and other advertising channels based on the briefing).

All candidates should apply via the Club's career website and fill in an application form on our Applicant Tracking System (ATS) – Centre Circle. This is to ensure a consistent process for all candidates and allows us to effectively review all applications. Candidates applying to Safer Recruitment Roles, will be required to complete a full application form on Centre Circle which includes:

- Educational qualifications
- Employment history
- References
- CV
- Covering letter



SCREENING

For Safer Recruitment roles, screening, scrutinising applications and short-listing candidates must be completed by at least two individuals from the interview panel, known as the 'screening panel'.

The screening can take place either separately in Centre Circle, with each screening panel member making their own notes or can be done in collaboration via discussion. The method will be decided ahead of the screening within the briefing.

Members of the screening panel must review each application received. For candidates who have been shortlisted, the screening panel must record objective evidence regarding the application and record these notes.

Please visit The Shelf to view a "first stage safer recruitment screening template."

Please note that for a Safer Recruitment role, all incomplete application forms should be should not be shortlisted. This is because it is a mandatory requirement for applicants to fill out an application form with all required and relevant information so that we can ensure we are creating a safe and positive work environment, by only recruiting staff members and individuals who are suitable and qualified are to work with children and/or adults at risk.

It is a criminal offence for anyone to seek or accept work in regulated activity knowing that they are barred from working with children; and for an employer to offer work to, or employ a person in a regulated position knowing that the person is barred from working with children. All applicants will be made aware that providing false information is an offence, and could result in the application being rejected, or summary dismissal, or the requirement for a volunteer to cease to carry out their role, if the applicant has been selected or recruited, and referral to the police and/or the DBS.

Any additional introduction or closing questions.

For those candidates who were not invited to an interview, an email can be sent via Centre Circle (please see guide for more information).

FIRST STAGE INTERVIEW

The screening panel collectively will confirm the names of the shortlisted candidates, who will be invited to attend an interview through Centre Circle. Hiring Managers will send out an interview invite directly to the candidates so that they can diarise an interview and to create a positive candidate experience. A guide on how to book interviews can be found on The Shelf.

PREPARING INTERVIEW QUESTIONS



Questions must be prepared in advance of the interview based on the job description and the candidates experience. The “Safer Recruitment first stage interview guide” is available on the Shelf.

Please note that for a Safer Recruitment first stage interview, an interview guide for one candidate, may be slightly different to another. The first stage is designed to explore the individual’s experience and history which is unique to them. This allows the interview panel to focus solely on the candidate, ensuring a thorough assessment of their suitability for the position. It also provides a private setting for discussing sensitive information such as the candidate’s work history, or any safeguarding concerns.

The first interview questions must include:

- Competencies listed in the job description – It is important that any qualities and behaviours stated in the job description are being measured by asking questions that are linked to these behaviours.
- Exploration of employment history – Gaps in employment/training history must be fully explored and accounted for.
- Exploration of technical experience – Questions should be formed around the technical competencies including relevant qualifications, training, and level of competency in their specialist areas.
- Motivation for applying to this role - The candidate must be asked and discussed fully why they want to work for the Club and the role they are applying for in particular. Criminal history disclosure question - As part of employee checks following the interview, candidates are asked to make a criminal records disclosure. It is important that they disclose this information to hr@tottenhamhotspur.com within 24 hours of attending an interview.

Candidates should be reminded that if they are successful at interview, all previously criminal records including cautions and reprimands will be disclosed as part of Enhanced DBS with child/adult Barred list and that a start date cannot be agreed upon until the return of a satisfactory DBS and references. Please see the DBS Policy for further information

Please note: Where candidates have a criminal history, they are asked to seek independent advice from unlock.org.uk and nacro.org.uk as to which criminal records they should disclose.

Detailed notes should be taken during the interview and should be recorded on the “Safer Recruitment first stage interview guide”. Notes should provide a rationale for selection to the next stage or rejection. Recorded notes and feedback are to be scanned or handed to the Recruitment department to store confidentially in line with our Data Retention Policy.

Once all candidates invited to the first interview stage have been interviewed, the screening panel will discuss feedback on each candidate and confirm with the Recruitment Department which candidates are suitable and to be invited to a second stage interview. An email template can be sent through Centre Circle inviting the candidate to attend the second stage interview either face to face or virtually, which will include the relevant address or the virtual link.

SECOND STAGE INTERVIEW

PREPARING SECOND STAGE INTERVIEW QUESTIONS





In the second stage, questions should focus on value-based interviewing (“VBI”) incorporating the Spurs Way values. The “Safer Recruitment second stage interview guide” shall be shared in advanced by the Recruitment Department who can support in writing the interview questions. There is also a bank of VBI questions which can be located on The Shelf.

VBI focuses on how and why an individual makes their choices in the work context and the underlying reasons for their behaviour. This type of interviewing technique is particularly important when assessing a candidate’s motivations to work with children and/or adults at risk. It focuses on the motivations, values, and the attitude of those who are applying for the role and exploring reasons for their behaviour.

The second stage interview differs from the first stage in the sense that questions will be agreed and fixed for all candidates prior to the interview. The first stage is about exploring a candidate’s personal application, whereas a second stage explores more competency questions. This ensure fairness and consistency when interviewing candidates and scoring which will be explored further on in the policy.

One questions for each of the values below should be selected for the interview (making a total of 8). These set of selected questions must be used consistently for all candidates interviewing for the role.

Five key success characteristics

- Self-awareness
- Integrity
- Managing children, young people, or adults at risk in an effective way
- Handling pressure and stress
- Showing genuine compassion

Spurs Way Values

- Dare
- Respect
- Drive

Please see “*Value Based & Spurs Way Bank of Interview Questions*” for a bank of interview question examples which can be located on The Shelf.

POST SECOND STAGE INTERVIEW

A scoring system based on 0-5 will be used for each question. The higher the score, the more suitable the candidate is for the role. Any candidates that score less than 75% should **not** be considered for the role, with full analysis of each example given during the interview. The scoring matrix can be found at the end of the interview guide.

Detailed notes should be taken during both interview stages and should be recorded on the interview guides provided. Notes should provide a rationale for selection for offer or rejection, in order to provide comprehensive feedback to unsuccessful candidates.



MAKING THE OFFER AND FEEDBACK

Managers should give feedback to all unsuccessful candidates.

candidates who attended an interview, for the best candidate experience we recommend that they receive a phone call with a summary of the feedback. Managers should also let them know that they will receive an email to follow up. Please find the link to the guide on how to give feedback to candidates.

Depending on the type of post the vacancy is (e.g. a casual role, a contract or through an agency) will depend on how an offer is processed. A detailed guide on “Making an offer process” can be viewed on The Shelf.

POST RECRUITMENT

No start date is to be confirmed until a DBS check and satisfactory references have been completed, and no employee / worker can start their employment prior to the DBS check being returned. It is vital that the interview panel ensures this is communicated to the candidate during the interview stage.

Please note: It is an offence for the Club to undertake a DBS check or to use a recent check obtained elsewhere that is different from the level of check required for a role. It is also an offence to undertake a DBS where none is indicated. For example, if the role requires an ‘enhanced DBS check’, neither a ‘standard’ nor an ‘enhanced and barred list’ check can be used. A new ‘enhanced’ check will be undertaken for the role.

Once the candidate has accepted the job offer, the below will be completed by HR prior to the candidate commencing employment.

- Right to work documentation
- DBS check and document verification
- References
- Education and Qualifications (if applicable. For example, ATMIF qualification)

POSITIVE INFORMATION

Recruiting managers are advised to ensure that the DBS and other relevant employment checks are clear prior to a candidate being appointed.

If a DBS certificate is returned with positive information, a risk matrix will be applied and reviewed by the Risk Assessment Panel. Please refer to Disclosure and Barring Service Policy for further information.

INDUCTION AND TRAINING

Safer Recruitment should be a continuing process of improvement and education and our ongoing training is a sign of our commitment to ensuring we create safe, inclusive working environments for our staff, fans, players and parents/carers.



Delivering compliance in this specific safeguarding area includes :

- Safeguarding in the workplace with the Head of Safeguarding
- Completion of an e-learning Safeguarding Module with the Premier League as well as an introductory e-learning module hosted internally which requires mandatory completion by every new starter at the Club
- Safeguarding practices are included in the Club induction process delivered by a member of the Safeguarding Team. This covers safeguarding definitions, incident reporting, positions of trust, prohibited relationships/conduct and safeguarding governance
- Providing employees with relevant safeguarding Company policies in multiple formats to ensure accessibility
- Regular mandatory Safer recruitment training delivered in conjunction with the Premier Leagues subject matter experts
- Ongoing training needs analysis to ensure that all safer recruitment training is delivered on time and to standard adhering to all required legislation

DATA PROTECTION

Successful candidates will have their notes saved on their files digitally, the paper copies are to be confidentially disposed. Unsuccessful candidates' notes are retained for 6 months and then they are securely disposed.