



# **Crawley Town Community Foundation**

## **Safer Recruitment Policy**

**March 2025**

## **Who this document applies to:**

This document applies to all Crawley Town Community Foundation employees and volunteers (including charity trustees, and/or boards of directors) working with in 'regulated activity' with children and young people, under the age of 18, and/or adults at risk.

Anyone involved in the recruitment, selection, vetting or supervising of employees and volunteers working within the organisation do so in line with this policy and are appropriately trained in the principles of safer recruitment.

We operate guidance around undertaking DBS checks, which should be read alongside this policy.

*“For those agencies whose job it is to protect children and vulnerable people, the harsh reality is that if a sufficiently devious person is determined to seek out opportunities to work their evil, no one can guarantee that they will be stopped. Our task is to make it as difficult as possible for them to succeed.”*

***Bichard Inquiry Report, 2004, p 12 para 79***

## Regulated Activity

'Regulated activity' as defined in the Safeguarding Vulnerable Groups Act 2006 (SVGA) which has been amended by the Protection of Freedoms Act 2012 (PoFA) involves roles working directly with a child, young person or adult at risk made up of:

- what activity a person carries out and how often the person does it; or
- where the role takes place and how often the person will work there; or
- working in specified positions in Wales

The following activities are classed as **regulated activity with a child if delivered regularly by the same person** (once a week or more often, or on 4 or more days in a 30-day period, or overnight):

- Unsupervised activities: teaching, training, instructing, caring for or supervising children; providing advice or guidance on wellbeing; or driving a vehicle only for children.
- Working for a limited range of establishments ('specified places') with opportunity for contact with children, for example, schools or children's homes.

The following are **always classed as regulated activity with child**:

- Healthcare for children provided by, or under the supervision of, a regulated healthcare professional.
- Personal care for children.
- Registered childminding or foster care.
- Managing or supervising any person who is engaging in regulated activity.

The following activities are classed as **regulated activity with an adult**:

- Healthcare for adults provided by, or under the supervision of, a regulated healthcare professional.
- Personal care for adults.
- Social work provided by a social care worker.
- Assisting an adult with cash, bills or shopping because of their age, illness or disability.
- Assisting in the conduct of an adult's own affairs under a formal appointment.
- Conveying or transporting adults because of their age, illness or disability to or from places where they receive healthcare, personal care or social work.

**If the applicant's role involves regulated activity, they are eligible for an Enhanced DBS check and a check of the relevant barred list.**

## Defining a Role or Position

Before recruiting for a position, we first identify:

- The duties of the role.
- The responsibilities of the role, including responsibilities relating to the supervision, welfare and safety of children, young people, or adults at risk.
- How will the role be supervised, and who the post holder will report to within the organisational structure.
- The type, length, hours, and location of the role.
- A timeline for filling the position.

Once the role has been defined and the responsibilities outlined, a formal **job description** (or role description for voluntary positions) outlining the duties and responsibilities of the role will be established, along with a **person specification**, clearly outlining the essential and/or desirable skills, experience, qualifications, and personal attributes required for the role.

Due to the nature of the business, all staff within the Crawley Town Community Foundation, will undergo an Enhanced DBS and Barred List check.

## Advertising a Role or Position

Advertising the role or position is the earliest opportunity for our commitment to safeguarding to be shared with any potential applicants, deterring unsuitable applicants from applying for a position. Our safeguarding statement, along with the requirements for the applicants' relevant criminal history to be disclosed and eligibility requirements for an Enhanced DBS check and Barred List check are clearly present on job adverts, as well as within the application packs issued to applicants.

## Candidate Application Information

All information for vacancies is available to applicants via the Foundations website ([www.ctcommunityfoundation.com](http://www.ctcommunityfoundation.com)), where applicants will be able to access a job description, person specification and be able to access the link to our online application form.

The online application form also includes Self-Disclosure of Relevant Criminal History and applicants will also be signposted to our safeguarding and rehabilitation of ex-offenders' policies.

Where the role involves engaging in 'regulated activity,' the application form will include a statement that **it is an offence to apply for the role if the applicant is barred from engaging in 'regulated activity.'**

Application forms include:

- Full personal information, including details of former names by which the person has been known in the past and evidence of their name changes.
- A full employment history (both paid and voluntary) since leaving school, including any periods of further education or training.
- Details of any relevant academic and/or vocational qualifications.
- A personal statement from the candidate, explaining in their own words how they meet the criteria for the role and the person specification.
- A signed declaration from the candidate that all the information provided as part of their application is correct.

### **Self-Disclosure of Relevant Criminal History Form and Procedure**

We ask applicants to provide information of any relevant criminal history if we formally invite them to interview.

A declaration, as appropriate for the position, that the person has no convictions, cautions, or bind-overs or if they have, to provide details in a sealed envelope and marked 'Private and Confidential'.

### **Requesting References**

We will request consent from the applicant to seek references as part of the recruitment process, after interviews have taken place and an unconditional offer has been made.

When seeking, accepting & scrutinising references:

- Two independent references will be sought.
- One reference **must be** from the applicant's current or most recent employer. If this applicant has not been employed before, a reference from a voluntary role, placement or from an educational setting will be sought.
- If the applicant's current or most recent role is not in 'regulated activity' or associated work with children, young people, or adults at risk, but the applicant has worked with these groups in past roles, then the second reference will be sought from that organisation who can comment on their previous performance and suitability.
- References will not be accepted from a relative of the applicant.
- References will only be accepted directly from the referee and from a professional email inbox.

- A reference pro-forma will be supplied to the referee to collect consistent and relevant information on the applicant's suitability to work with children, young people, or adults at risk.
- If a reference is not supplied, incomplete or raises a concern (does not reflect the information provided in the application form or contains ambiguous statements around applicant suitability etc.), the referee will be contacted directly by phone, and a record of any conversations kept.
- Open references, or testimonials will not be accepted.

## Shortlisting

To decide on which applicants to bring to interview, we will:

- Scrutinise the application form against the job/role description and person specification.
- Check for any gaps in employment and frequent changes to ensure reasons are clear and justified.
- Ensure the application is fully completed and the declaration signed and dated by the applicant.

In addition to obtaining references, where possible **an online search will be carried out** as part of the pre-interview checks. This may help identify any incidents or issues that have occurred and are publicly available online, that we may wish to explore further at interview.

## Interviewing & Selection

Interviews are conducted by a panel made up of a minimum of two senior staff members, at least one of which is trained in safer recruitment practices and where possible the panel will consist of male and female staff (this is subject to availability).

A face-to-face interview is held for all roles in 'regulated activity' or which involve contact with children, young people or adults at risk.

Interview questions are developed prior to the interview taking place and are posed consistently to all interviewees applying for the position. Questions are developed to gauge the experience, skills, and abilities of the applicant against the job/role description, as well as their values, behaviours, and personal attributes (particularly those relating to work with children, young people, and adults at risk) against the person specification. The answers the applicant gives may lead to additional questions to explore their answers in more detail.

Additional questions relating to the information found in the application form or from references are also asked (to verify information, explore anomalies and ensure gaps in employment are justified etc.).

A criterion for “scoring” interview questions against the job/role description and person specification is developed prior to the interview by addressing each question and exploring what information given by the applicant would be considered both positive and negative indicators of their competency, experience, or personal attributes.

All applicants who are invited for an interview will be required to bring documentary evidence of their identity – either a full birth certificate, passport or photocard driving licence and additionally a document such as a utility bill that verifies the applicant's name and address. Where appropriate, change of name documentation must also be brought to the interview.

Applicants are asked to bring original or certified copies of documents confirming any necessary or relevant educational and professional qualifications. If the successful applicant cannot produce original documents or certified copies, written confirmation of their relevant qualifications must be obtained from the awarding body.

## **Pre-appointment checks and making an offer of employment**

Any offer of appointment made to a successful applicant will be conditional upon satisfactory completion of the necessary pre-appointment checks, including:

- Verification of the applicant’s identity.
- The receipt of two satisfactory independent references. Where references were not obtained before the interview, they are to be obtained and scrutinised before the applicant’s appointment is confirmed.
- The appropriate DBS Disclosure for the role. An enhanced DBS certificate, including a check of the relevant Barred List must be obtained for roles in regulated activity. **DBS checks will be refreshed on a 3-yearly basis**, unless the employee or volunteer register their certificate with the update service upon taking up employment. In such cases, we operate a consent-based approach to checking the certificate against the update service database.
- Confirmation that the applicant is not subject to an Order under section 79 of the Charities Act 2016 for their removal/disqualification from a charity, if applicable.
- Verification of the applicant's right to work or to volunteer in the UK.
- Overseas police checks/criminal record checks for an applicant who has lived or worked overseas.
- Verification of any relevant qualifications and professional status and whether any restrictions have been imposed by a regulatory body, such as the Teaching Regulation Agency.

## **Induction & training**

All appointed employees and volunteers are subject to a successful probation period where they will be formally inducted into their role and receive training relevant to their roles and responsibilities, as well as to the safety and welfare of children, young people, and adults at risk, including safeguarding training.

Records of employee and volunteer induction and training are maintained, and any concerns raised around the suitability of the appointment during this period are formally addressed.

## **Supervision & Appraisals**

All employees and volunteers are formally supervised and undertake a review of their performance with their supervisor annually. Goals and objectives are set during the appraisal process, and these are monitored.

Safeguarding processes are considered as part of one-to-one and appraisal processes, and all employees and volunteers' competencies are discussed and documented. Employees and volunteers are encouraged to use these formal meetings to discuss safeguarding practices, as well as more regularly as part of general meetings.

## **Ongoing Culture of Vigilance**

The impact of an organisation's culture on the good practice and conduct of employees and volunteers cannot be overlooked. Safer Recruitment and DBS checks alone will not ensure that activities are well supervised and supported. We are committed to establishing and maintaining the values and culture of the organisation, ensuring all employees and volunteers understand and uphold their responsibilities in relation to the quality and safety of activities and be effectively supervised to ensure they have the continued support required to do so.

Safer Culture measures include, but are not limited to:

- A "from the top down" approach in prioritising safeguarding.
- Clear organisational values and expected behaviours, including a code-of-conduct.
- Regular and consistent channels for people, volunteers, and participants to openly discuss working practices.
- A thorough induction process for all people and volunteers, regardless of their position or contract type. This includes a safeguarding and health & safety induction.
- Training specific to the role.
- A process for regularly refreshing DBS checks/ Barred List checks and seeking self-disclosure of criminal history from our team.
- Easily accessible and understandable policies & procedures.
- Access to key contacts in the organisation such as the safeguarding and health & safety leads.
- Briefings to ensure staff and volunteers have access to all the information and resources they need to run safe and quality activities.



- Regular sessions with a line manager including discussions around safeguarding practices.
- Team meetings with safeguarding as a fixed agenda item.
- Debrief sessions for employees and volunteers following the management of safeguarding concerns.
- Partnership working with local authorities.
- Lessons learned from poor practice.

## **Managing Low Level Concerns**

Where employees or volunteers act in a way which is inconsistent with the staff code of conduct, (including inappropriate conduct outside of work) and this behaviour doesn't meet the threshold of harm or is not considered serious enough for referral to the local authority, this is still to be reported to the Head of Foundation, who will decide upon the best course of action to take and will keep a record and monitor any patterns of behaviour relating to the individual.

Low level concerns may include:

- Inadvertent or thoughtless behaviour.
- Behaviour that might be considered inappropriate depending on the circumstances.
- Behaviour which is intended to enable abuse.

People and volunteers are also asked to self-report any instances where their own conduct may have been inconsistent with the code-of-conduct, or where their behaviour outside of work cause concerns over their suitability to work with children, young people, or adults at risk (such as disciplinary proceedings within other roles they may hold relating to vulnerable groups, or criminal proceedings they are facing etc.).

## **Managing Allegations of Poor Practice or Abuse**

Allegations of abuse and concerns about poor practice raised against our people, including volunteers will always be taken seriously, including where a non-recent concern is raised.

We expect all people and volunteers to share a commitment to safeguarding children, young people, and adults at risk, in accordance with this policy during their employment or volunteer activities.

In addition to this policy, our expectations of employee and volunteer conduct are clearly outlined in:

- Induction & training
- Safeguarding Code of Conduct
- Safeguarding Children & Young People Policy and Safeguarding Adults at Risk Policy

Complaints or concerns will be dealt with as an allegation where it is suggested that the person has:

- Behaved in a way that has harmed a child or may have harmed a child
- Possibly committed a criminal offence against or related to a child
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children

#### Acknowledgement of Allegations

All allegations will be acknowledged to the referring person/organisation within one working day of receipt, unless:

- The initial information is overtly spurious and is a malicious complaint.
- From an anonymous complainant.
- The circumstances mean that there are concerns in relation to confidentiality or where there is potential to jeopardise a local authority investigation.

Where an allegation of poor practice or abuse is made against a person, we will:

- Remove the person/volunteer from their duties until the complaint has been formally investigated.
- Make a referral to the relevant authorities.
- Decide on the suitability of the person/volunteer. An investigation may lead to the permanent or temporary suspension of the person.

#### **Making Referrals to the LADO, DBS and FA Case Management Team**

Allegations against an employee or volunteer will be referred to the Local Authority Designated Officer (LADO) at our Local Safeguarding Children's Partnership (LSCP) within one working day, and where there may have been a criminal offence committed, to the police within one working day.

Concerns raised about significant poor practice can sometimes be difficult to determine against thresholds for referral to statutory agencies such as the LSCP. An example of this may include breaches of the Safeguarding Code of Conduct for people and Volunteers. In such situations we will use our professional judgement and seek advice where appropriate from the LADO before deciding whether to make a formal referral, or whether to treat the concern as serious allegation or a "Low Level Concern."

DBS states that there is a legal duty to make a referral to the in the following circumstances:

- you withdraw permission for a person to engage in “regulated activity” with children and/or vulnerable adults. Or you move the person to another area of work that is not regulated activity.

This includes situations when you would have taken the above action, but the person was re-deployed, resigned, retired, or left. For example, a person resigns when an allegation of harm to a child is first made.

You think the person has carried out one of the following:

- engaged in relevant conduct in relation to children and/or adults. An action or inaction has harmed a child or vulnerable adult or put them at risk or harm or;
- satisfied the harm test in relation to children and / or vulnerable adults. e.g. there has been no relevant conduct but a risk of harm to a child or vulnerable still exists.  
Or
- been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence

**Further information on when and how to make a referral can be found at [www.gov.uk/government/organisations/disclosure-and-barring-service/about](http://www.gov.uk/government/organisations/disclosure-and-barring-service/about)**

**The FA Case Management Team** must be notified if there has been an allegation made against a person or volunteer by completing a Safeguarding Referral Form. \*

The Case Management Team also request that they are notified of any minor conduct or poor practice issues by completing a Low-Level Concerns Notification Form. \*

The Case Management Team will:

- Conduct a safeguarding investigation based on the information provided. This may include an interview with our organisation and the person/volunteer
- Consult their records for any previous investigations relating to the person/volunteer while at another Club or CCO within EFL or the Premier League
- Decide on the suitability of the person/volunteer. An investigation may lead to the permanent or temporary suspension of the individual

\*We must complete the appropriate FA form for the level of the concern. If unsure, we will contact [safeguarding@thefa.com](mailto:safeguarding@thefa.com).

Where The FA Case Management Team's safeguarding investigation is closed without suspension, the CCO must consider their own disciplinary actions, which may include:

- A formal warning
- Performance management/training
- Dismissal

## Position/Relationship of Trust

### Position of Trust

A 'Position of trust' is a legal term that refers to certain roles and settings where an adult has regular and direct contact with children. Examples of positions of trust have previously included teachers, care workers, youth justice workers, social workers and doctors.

In 2022 the definition was expanded to include faith leaders and *sports coaches*.

People in these roles or working in such settings may well be in positions of trust and will normally have power and authority in a young person's life and may have a key influence on their future. They will have regular contact with the young person and may be acting in loco parentis.

It is against the law for someone in a position of trust to engage in sexual activity with a child in their care, even if that child is over the age of consent (16 or over).

### Relationships of Trust

We adopt the stance that there are some roles where adults may not have a legal '**position of trust,**' but whose role and responsibilities could be viewed as a '**Relationship of Trust**'.

A 'relationship of trust' can be defined as where an individual has responsibility for, authority and influence over young people and therefore have an ethical obligation to safeguard and protect young people from exploitation.

Whilst legally, young people aged 16 and 17 have reached the age of consent for sexual activity, any inappropriate sexual relations involving staff and volunteers, with young people

aged 16 or 17, will be considered a breach of a **'Relationship of Trust'**. These concerns will be referred to the appropriate statutory agencies and the employee or volunteer may be subject to disciplinary action in respect of their employment. Where relevant, we will also make other regulatory body aware in those circumstances.

### Management Information

<b>Policy Name:</b>	Safer Recruitment Policy
<b>Effective Date:</b>	March 2025
<b>Next Review Date:</b>	March 2026
<b>Drafted By:</b>	Darren Ford
<b>Approved by Board Date:</b>	March 2025
<b>Available to staff and / public via:</b>	<ul style="list-style-type: none"> <li>● Crawley Town Community Foundation website (Staff/Public)</li> <li>● Breathe HR Portal (Staff)</li> </ul>
<b>Linked Policies or procedures:</b>	<ul style="list-style-type: none"> <li>● Safeguarding Adults at Risk</li> <li>● Safeguarding Children and Young People</li> </ul>