



**SWANSEA CITY ASSOCIATION FOOTBALL CLUB
LIMITED**

RECRUITMENT POLICY STATEMENT & PROCEDURE

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APPLICANTS GUIDE TO THE DBS PROCEDURE

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RECRUITMENT OF EX-OFFENDERS POLICY

Document History

Document Location

This document can be accessed from the following location:

HR Intranet
HR Department
www.swanseacity.com

Revision History

The latest revision can be found at the top of the list

Revision Date	Author	Version	Summary of Changes
10 th December 2025	Rebeca Storer	V5.3	Policy Review following Audit.
05 th December 2025	Nicola Butt	V5.2	Policy Review. All roles now advertised via EFL IRecruit System. Removal of FA Diversity Code and replaced with Rule N.
21 st September 2023	Rebeca Storer	V5.1	Update to DBS section
10th August 2023	Nicola Butt	V5	Policy Review
25 th July 2022	Nicola Butt	V4	Update to reference requirement
24 th January 2022	Rebeca Storer	V3.1	Update to coincide with other policy updates for 2022
22 nd January 2022	Nicola Butt	V3.0	Updating 2022
22 nd September 2020	Rebeca Storer	V2.0	Updating Original Policy
2018		V1	Original Policy

Approvals

This document requires the following approvals:

Name	Version	Date of Approval	Signature
Tom Gorringe	V5.3	10/12/2025	



RECRUITMENT POLICY STATEMENT

Swansea City Association Football Club acknowledges and is committed to being accountable for effective and consistent implementation of safer recruitment procedures. It is the Club's policy that line managers are responsible for recruitment in conjunction with the human resources department.

Equal Opportunity is an integral part of our recruitment and selection process and the organisation welcomes applications from all individuals who feel they meet the core requirements of a particular role.

The organisation strives to further diversify its workforce and therefore encourages applications from women, disabled people and individuals from diverse ethnic communities who are currently under-represented within the organisation.

All appointments will be made based on the applicant's abilities and individual merit as measured against the criteria for the job. Qualifications, experience, skills, personal and professional competencies will be assessed.

To encourage applications from minority groups and to provide confidence to applicants that they will not be disadvantaged during the recruitment process the Company is proud to support Disability Confident, Dyslexia Friendly and the EFL Code of Practice.

The Company is a Disability Confident employer and will offer an interview to a disabled applicant so long as they meet the minimum criteria for the advertised job. Any candidate with a disability will not be excluded unless it is clear that the candidate is unable to perform a duty that is intrinsic to the role, having taken into account reasonable adjustments. Reasonable adjustments to the recruitment process will be made to ensure that no applicant is disadvantaged because of their disability.

The Company has been recognised as Dyslexia Friendly. Applicants are encouraged to disclose if they have dyslexia on the application form so hiring managers can adapt their recruitment process to ensure the individual is not at any disadvantage.

Department Managers have received Dyslexia Awareness Training to ensure they have the necessary knowledge and skills to support a dyslexic applicant or employee.

The Company has achieved a bronze rating in the EFL Equality Code of Practice, which reviews the club's dedication to equality, diversity and inclusion (EDI) as an employer and as a club.

The Club also supports the EFL Rule N which aims to increase representation of minority groups within its workforce. The latest Rule N report can be found [here](#).



RECRUITMENT PROCEDURE

Swansea City Association Football Club acknowledges and is committed to being accountable for effective and consistent implementation of safer recruitment procedures.

It is the Club's policy that line managers are responsible for recruitment in conjunction with the human resources department. A line manager who wishes to recruit someone must first obtain authority to advertise the vacancy via the human resources department. The HR Manager will then communicate with the necessary individuals to obtain authorisation to advertise. Where recruitment is planned to fill a vacancy created by a leaver, approval will normally be granted automatically. If, however, the line manager wishes to upgrade a position, or create a new position, justification for this must be presented.

Vacancies

All vacancies will be advertised via the appropriate channels, including but not limited to:

- Official Club Website
- Official Club LinkedIn Account
- Kick it Out
- UK Sport
- Women in Football
- EFL I-Recruit System

Job Adverts

All job adverts must be signed off by the HR Department before being published in the public domain.

Job adverts will describe the purpose of the role, the main accountabilities and the level of seniority associated with the position. It will also describe the knowledge, type of qualifications, training, experience, skills, aptitude and, for senior positions, the personal and professional competencies required for effective job performance of the job.

In the majority of cases the job advertisement will display the salary of the role, or salary band. Company benefits and flexible working options (if available) shall be listed on job adverts.

The language used within the advert will be reviewed to eliminate the use of biased language. The Club will endeavour to check adverts on a 'gender decoder' system prior to their advertisement.



Internal Applications/Vacancies

Internal vacancies will be advertised via the staff intranet.

Internal applicants will be required to apply for vacancies in the usual way, and the interviewer will request a suitability reference from the employee's direct line manager. Internal applicants will automatically be granted an interview in cases where they meet the essential criteria of the job advert.

Advertising

Where the job is to be advertised, the proposed advertisement must be submitted to the HR department for approval. The line manager should also consider the best medium for advertising their vacancy and whether they wish to use an external organisation. The use of external recruitment agencies must be approved by the HR Department in advance as well as an appropriate budget agreed with the Finance Department.

The Club will advertise vacancies across a range of diverse forums and will endeavour to positively encourage applications from under-represented groups.

Applications

Applicants are required to apply for positions via the EFL I-recruit System. Applicants must provide details of key skills and qualities relevant to the role, previous experience, education and training information, employment history, details of gaps in employment, any additional information relevant to the application, professional memberships (if necessary) and two referees.

All applications will initially be 'blind' until shortlisted for interview.

Shortlisting

The Line manager who is recruiting will be asked to provide the HR Department with the list of shortlisted candidates for interview. The HR Department will then arrange suitable times and dates for interviews.

As part of the Clubs shortlisting process consideration may be given to carrying out an online search as part of the club's due diligence on shortlisted candidates.

Interviews

The line manager conducting recruitment interviews will ensure the questions that they ask job applicants are not in any way discriminatory or unnecessarily intrusive. For permanent position there should be at least two people involved in the interview process and it will focus on the needs of the job and skills needed to perform it



effectively. A record of every recruitment interview should be made and passed to the HR department to be retained for a suitable period of time. Job offers are not to be made during or at the end of an interview.

If the role involves working with children and adults at risk, the line manager shall be provided with a list of safeguarding questions to ask the candidate. Responses to these questions shall be passed to the Head of Safeguarding to assess the candidate's suitability for the role.

The interviewing line manager shall also ask the candidate about any gaps in employment and will ensure those who have gaps due to childcare commitments are not disadvantaged.

Pre-Employment Checks

It is the Club's practice to ask the successful candidate for consent to obtain two written references, one reference must be the candidates current or most recent employer, and the second a previous employer, teacher/lecturer.

Candidates will also be required to provide documentary proof of qualifications and proof of their right to work in the UK. Any offer of employment will be conditional on these being satisfactory.

Candidates who are not UK or Irish citizens will be asked to provide a 'Share Code' in order for the Club to conduct an online right to work check.

As part of the Club commitment to safeguarding, the successful applicant may be required to undergo a DBS (Disclosure Barring Service) check or an enhanced DBS check. The results of a DBS check will be considered on an individual basis and the organisation will act in a proportionate manner when deciding whether or not to proceed with the appointment.



APPLICANTS' GUIDE TO THE DBS PROCEDURE

If a DBS is required for a role, then this will be identified at the interview stage. Applicants will be informed of whether a basic or enhanced DBS will be required. This will allow for self-disclosure.

An offer letter will state that commencement of a role will be dependent upon a successful DBS check.

Where a DBS is required, Applicants will be required to complete the online form (as explained below) within 3 days and provide original ID (as explained below) within 1 week of being offered a role (unless agreed otherwise and at the discretion of the Club).

Step 1:

You will receive an email from KYP (the online DBS supplier). The KYP email will include a link which you will need to follow. KYP will be able to assist you with any problems once you have logged in to the system.

Step 2:

Once you have submitted your details online you will need to provide your original identity verification documents (as outlined online) to the Safeguarding/HR Department. If you have any problems with providing your original documents, then you must contact the Safeguarding/HR Department as soon as possible.

Identity documents

In most circumstances, we will need to see 3 documents to verify your identity and address and would recommend:

- a valid passport (with your current Biometric Residence Permit or current visa if you are not a national of the UK)
- a utility bill (UK) showing your current address which is less than 3 months old (excludes mobile phone bills) and
- another document with your current address (e.g. current driving licence, a bank statement - less than 3 months old, etc).

Photocopies of identification will not be accepted.

We will check your online information against your verification documents and submit the application.



Step 3:

The DBS will carry out the necessary checks and return a disclosure to you. At the same time KYP will inform the Club as to whether the disclosure was clear or not although no further information will be provided as to the nature of the disclosure. If the disclosure is not clear, you will be asked to present the original disclosure to the Safeguarding Department. The Club will then consider the contents of the disclosure and either confirm the offer of employment or invite you to a meeting if there are any potentially relevant convictions or other related information that require further exploration. The Club has a responsibility to assess the relevance of any criminal record before deciding whether an offer of employment can be confirmed. The Club will complete a risk assessment and retain a copy of the disclosure.

Frequently asked questions

Why do you need to know this information?

The Club and potential employees have a statutory obligation and a duty of care to ensure the protection of certain vulnerable groups in particular circumstances. Where the post involves significant contact with children or vulnerable adults and in certain other cases, the Club is entitled to make enquiries about the applicant's entire criminal record and will seek a disclosure through the DBS.

Who pays for the disclosure?

The cost of a disclosure relating to a job application and the admin charge for using the online system will be met by the Club.

What if I already have a CRB Disclosure or a DBS disclosure?

The Club's policy is not to accept CRB disclosures or DBS disclosures issued to a previous employer or volunteer body. This is because there is a risk that information may have changed since its issue; the information released by the Police was based on the position for which the DBS disclosure was originally applied for and other information may be disclosed for a different position; and to manage risk effectively the Club needs to conduct its own checks. You must therefore complete a new application for the post you are applying for within the Club.

It is the policy of the Club to require a new disclosure every three years.

What if I have a criminal record?

Having a criminal record will not necessarily bar an applicant from working within the Club. Rather, depending on the nature of the position and the circumstances and background of the offences, a decision will be made in agreement with the appropriate Line Manager, Head of Safeguarding and HR Manager.



Any offences or other matters that are declared or disclosed which might be relevant to the position will be discussed with the applicant, the appropriate Line Manager, Head of Safeguarding and HR Manager. Failure to reveal information that is directly relevant to the position sought may lead to withdrawal of an offer of employment or disciplinary action including dismissal. The Club undertakes to discuss any matter revealed in a disclosure with the person seeking the position before withdrawing a conditional offer of employment or amending an employee's duties.

Who will see the information?

Information provided in a DBS disclosure and any self-disclosure information will be kept confidential and will only be shared on a need-to-know basis only.

Where the applicant will be involved in working with a partner organisation, explicit consent will be obtained from the applicant to agree to information received in the disclosure from the DBS to be shared with the organisation. The applicant will be asked to sign a written statement agreeing to this.

Information on the decision will be noted but the disclosure and any copies will be destroyed and no record of criminal matters, past or pending, will be kept on the individual's personnel file. However, information regarding the post being subject to a DBS disclosure will be recorded.



DBS RENEWALS

Individuals will be notified of a DBS renewal 3 months prior to expiry of the DBS term via the HR system.

The HR department shall register individuals for DBS renewal promptly and individuals shall be expected to complete the online form within 7 working days.

This measure is used in an attempt to avoid individuals being without a valid DBS check whilst in employment.

Should the DBS not clear during this allotted time, the Head of Safeguarding shall conduct a Risk Assessment to ensure measures are taken to protect at risk individuals and determine whether the individual, who is awaiting their DBS renewal, is permitted to work.

As a further protection measure, individuals are required, under the Safeguarding Children Policy to complete a Self-Declaration form each season.



SECURE STORAGE, HANDLING, USE, RETENTION AND DISPOSAL OF DISCLOSURE & BARRING SERVICE (DBS) CERTIFICATES AND CERTIFICATE INFORMATION

General principles

As an organisation using the Disclosure & Barring Service (DBS) checking service to help assess the suitability of applicants for positions of trust, Swansea City Association Football Club complies fully with the Code of Practice regarding the correct handling, use, storage, retention and disposal of certificates and certificate information. It also complies fully with its obligations under the Data Protection Act 1998 and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of certificate information.

Storage and access

Certificate information is never kept on an applicant's personnel file and is always stored electronically in the Club's secure electronic database. Access is strictly controlled and limited to those who are entitled to see it as part of their duties.

Handling

In accordance with section 124 of the Police Act 1997, certificate information is only passed to those who are authorised to receive it in the course of their duties. The Club maintains a record of all those to whom certificates or certificate information has been revealed and the Club recognises that it is a criminal offence to pass this information to anyone who is not entitled to receive it.

Usage

Certificate information is only used for the specific purpose for which it was requested and for which the applicant's full consent has been given.

Retention

Once a recruitment (or other relevant) decision has been made, the Club does not keep certificate information for any longer than is absolutely necessary. This is generally for a period of up to six months, to allow for the consideration and resolution of any disputes or complaints. If, in very exceptional circumstances, it is considered necessary to keep certificate information for longer than six-months, the Club will consult the DBS about this and will give full consideration to the Data Protection Act and Human Rights Act and inform the individual subject before doing so. Throughout this time, the conditions regarding appropriate, safe storage and strictly controlled access will prevail.



Disposal

Once the retention period has elapsed, Swansea City Association Football Club will ensure that any DBS certificate information is immediately deleted from the electronic database.

However, notwithstanding the above, the Club may keep a record of the date of issue of a certificate, the name of the subject, the type of certificate requested, and the position for which the certificate was requested, the unique reference number of the certificate and the details of the recruitment decision taken.



RECRUITMENT OF OFFENDERS POLICY

It is a requirement that all registered bodies must treat DBS applicants who have a criminal record fairly and do not discriminate because of a conviction or other information revealed.

This policy on the recruitment of ex-offenders, is made available to all Disclosure applicants at the outset of the recruitment process.

1. As an organisation using the Disclosure & Barring Service to assess applicants' suitability for positions of trust, we aim to comply fully with the Code of Practice and undertake to treat all applicants for positions fairly. We undertake not to discriminate unfairly against anyone who is the subject of a Disclosure on the basis of conviction or other information revealed.
2. We are committed to the fair treatment of our staff, potential staff or users of our services, regardless of race, gender, religion, sexual orientation, responsibilities for dependents, age, physical / mental disability, or offending background.
3. This policy will be made available to all DBS applicants at the outset of the recruitment process.
4. We actively promote equality of opportunity for all to achieve the right mix of talent, skills and potential and welcome applicants from a wide range of candidates, including those with criminal records. We select all candidates for interview on the basis of their aptitude, skills, qualifications and experience in relation to the requirements of the post.
5. A DBS check is only requested when it is both proportionate and relevant to the position concerned. For those positions where a DBS check is required, the recruitment information will contain a statement that a DBS check will be requested in the event of the individual being offered the position.
6. Where a DBS check is to form part of the recruitment process, we encourage all applicants called for interview to provide details of any criminal record at an early stage in the application process. We guarantee that this information is only seen by those who need to see it as part of the recruitment process.
7. We ensure that all those who are involved in the recruitment process will have suitable guidance to enable them to identify and assess the relevance of the offence in relation to the position applied for. We also ensure that they receive appropriate guidance on the relevant legislation relating to the employment of ex-offenders, e.g. the Rehabilitation of Offenders Act 1974.
8. At interview or in a later separate discussion, we ensure that an open and



measured discussion takes place on the subject of any offences or other matter that might be relevant to the position. Failure to reveal information that is directly relevant to the position applied for could lead to withdrawal of an offer of employment.

9. We undertake to discuss any matter revealed in a DBS check with the person seeking the position before withdrawing a conditional offer of employment.
10. We make every subject of a DBS check aware of the existence of the DBS Code of Practice and make a copy available on request.

Having a criminal record will not necessarily bar you from working with us. This will depend on the offence and the relevance of the offence in relation to the position applied for. The factors taken into account will include the responsibilities of the position, the vulnerability of the customer group, the nature of the offence(s), the number and pattern of the offences (if there is more than one), how long ago the offence(s) occurred and the age of the offender when the offence(s) occurred.

