

TOTTENHAM HOTSPUR

Safer Recruitment Policy

Foreword

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.

The board of directors of the Club and Trustees of the Foundation endorse this Policy as part of the Club’s constitution and commitment to Safeguarding.

Matthew Collecott

Strategic Safeguarding Lead
Board of Directors of the Club
Trustee of the Foundation

Effective Date of Policy: January 2026
Policy Owner/Lead: Head of Safeguarding
Review Date: January 2027

Introduction

Tottenham Hotspur Football Club are strongly committed to protecting and promoting the welfare, safety, and well-being of all children and adults at risk. Safeguarding is a shared responsibility and a fundamental value that underpins all activities whether delivered by Club staff, partners or external providers.

Following Safer Recruitment standards helps to create safe, inclusive, and supportive environments where all children, young people, and adults at risk can take part in sport in an environment which is safe and free from any risk of abuse.

Minimising safeguarding risks depends on everyone working together proactively, consistently, and with an agreed commitment. This policy outlines the Club’s approach to ensuring that all employee’s demonstrate this commitment through their recruitment and selection practices.



Purpose

The purpose of this Safer Recruitment policy is to ensure there is a consistent and effective recruitment and selection process in place. The policy aims to:

- Prevent the appointment of unsuitable individuals to roles that provide access to Children and Adults at Risk.
- Discourage unsuitable individuals from applying for roles at the Club.
- Create 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.

Scope

This policy applies to all staff 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.

The Club recognises that the recruitment process will need to be varied to suit the needs of the business and the different departments within it. For ease there are three tiers of employees which are referenced throughout this policy and accompanying procedure:

- **Tier One**
All staff in regulated activity whether permanent or casual, based at any location including Training Centre, Percy House, Lilywhite House, Stadium)
- **Tier Two**
Staff not in regulated activity but based at the Training Centre
- **Tier Three**
Any staff not in regulated activity based at any location other than the Training Centre

Regulated Activity refers to anyone who provides:

- Any coaching, training, instruction, advice or guidance to under 18's on a frequent basis (more than 3 days in 30), or
- Any personal or health care (even if just as a one-off).



Standards

This policy follows the guidance and standards set out by the Premier League. The Club requires that recruitment for all staff follows a consistent process to ensure that all applicants are treated equally with steps taken which are proportionate to the role the person is applying to.

Recruitment of each role will involve the following steps and where outlined must meet the minimum requirements for the tier the role sits in.

1. Job Descriptions
2. Advertising
3. Application process
4. Screening & Shortlisting
5. Interview
6. Conditional Offer
7. Pre Recruitment Vetting Checks
8. Risk Assessment
9. Decision
10. Probationary Period
11. Onboarding
12. Training
13. Repeat Checks
14. Self Reporting

Prominent Individuals will not be treated differently due to their profile or status. When engaging Prominent Individuals in an employment capacity, all safer recruitment requirements outlined in this policy must be followed.

Where such individuals are not employed but contribute to a Club's Activities in any way, appropriate due diligence and suitability checks must still be carried out in line with the Club's Safeguarding Due Diligence Policy.

1. Job Descriptions

All job descriptions will outline the key responsibilities and expectations of the job. The job description will outline the level of engagement with children, young people and adults at risk and be used to guide the level of vetting required. The Person Specification will define the skills and experiences and qualifications required.

2. Advertising

All adverts will include the following statement;

'Safeguarding is fundamental to the success in all that we do. The Club follows a Safer Recruitment process for all roles. Successful candidates are to be reminded they would be subject to proportionate background, DBS and reference checks as required for this role.'



3. Application Process

Anyone applying for a role must do so via the online portal Centre Circle. The Club will not rely solely on a CV. A cover letter or a statement explaining how the applicant meets the job description and person specification must be included. The process also requires the applicant to share details of their educational and employment history, an explanation of any gaps, a declaration of any personal Club connections and a declaration of accuracy.

4. Screening and Shortlisting

Screening will take place by at least two people. If the role is at Tier 1 or Tier 2, one of the people shortlisting will be Safer Recruitment trained within the last three years.

All applicants will be reviewed against the Job Description and Person Specification.

Any safeguarding concerns such as gaps in employment, inconsistencies, history of repeated changes of employment, will be noted and addressed at interview.

Any staff involved in the recruitment and selection process must declare if any shortlisted applicants are known to them in any personal or professional capacity. Where a potential conflict of interest exists, appropriate measures will be implemented to ensure fairness and transparency.

5. Interviews

The interview panel will consist of at least two people, it is considered good practice for those involved in screening and shortlisting to also participate in the interview panel.

For tier one roles, at least one member of the interview panel must have completed safer recruitment training within the last three years.

Identity documents of applicants will be viewed at interview stage to confirm that the person attending is the actual applicant and to help prevent identity fraud.

Interview notes will be recorded on an interview evaluation form with a scoring matrix for each applicant interviewed, this will include the questions asked, answers given, any relevant interview notes and scoring. Records will be securely retained for a period of at least six months.

6. Conditional Offer

Following interviews, a conditional offer can be made to an applicant, dependent on the successful completion of pre-employment checks. Although a provisional start date may be given, this may change if there are delays in the outcome of pre-employment checks.

No staff member in tier one can commence their role until the satisfactory completion of all pre-recruitment checks, including criminal record checks.

Applicants for roles in tier two and tier three may be able to commence limited duties before these checks are complete in truly exceptional and essential circumstances, which must be fully justified, supported by a thorough and documented risk assessment and strict supervision. These exceptions are extraordinary, not standard practice and must be approved by the Head of Safeguarding and Chief People Officer.

7. Pre-Recruitment Checks

a. Identity Verification

A follow-up identity and address check must be completed before the individual starts their role to ensure the accuracy and currency of documentation.

Original documents (such as such as a passport or driving licence) must be used to confirm the individual's full name, date of birth, and address.



In addition, a right to work check must be carried out to confirm the individual's legal eligibility to work in the UK prior to role commencement.

b. Self-declaration

Any applicant for a tier one or two role will be asked to complete a self-declaration form. This will allow the applicants to disclose relevant cautions, convictions, pending charges or investigations, as well as any safeguarding related proceedings, sanctions, or disciplinary actions by an employer, The FA, and other professional/regulatory bodies. This form does not replace the need for a criminal record checks but can provide an additional assessment of the suitability of individuals applying for roles that involve working with Children and Adults at Risk.

c. References

The successful applicant must provide details of at least two professional referees and consent to contact them. 'Open' references or testimonials will not be accepted. Professional referees cannot be peers, colleagues, friends, or relatives. If it is not possible to obtain two professional references, for example, school leaver or those with limited work experience, consideration will be given to seeking character and academic references which will be assessed alongside other information obtained through the recruitment and vetting processes.

Applicants for tier one roles, reference requests will include specific questions about the applicant's suitability to work with Children and/or Adults at Risk, including any known Safeguarding concerns. While some employers may only confirm employment dates, it is essential to ask these questions to demonstrate due diligence and uphold Safeguarding standards. Even if no response is received, documenting the request provides evidence that appropriate checks were undertaken.

Verifying references by using only official email addresses and phone numbers will confirm employment history, assess potential risks, and demonstrate due diligence in the recruitment and selection process.

d. Criminal record checks

The successful applicant must apply for a criminal record check through the Disclosure and Barring Service ('DBS'). If the applicant is subscribed to the DBS Update Service, a Status Check can be performed if the original DBS disclosure certificate matches the required level and workforce for the position applied for.

An overseas criminal record check(or equivalent) will be obtained for any individuals who have lived or worked outside the United Kingdom for six months or more in the past 10 years. Any documents provided in a foreign language must include a certified translation. If a country does not provide such checks, alternative Safeguarding measures should be considered, for example, obtaining additional references and conducting a risk assessment.

In line with Keeping Children Safe in Education (2025), an enhanced DBS check, including Children's barred list check must be obtained for any tier one applicant, regardless of whether they have ever lived or worked in the United Kingdom.

e. Professional registration and Qualification checks

Any role that requires professional registration, will be checked with the relevant regulatory or licensing body, ensuring they are fit to practice and not subject to any



prohibition order, interim prohibition order, disqualification, or other restrictions

f. Social Media Checks

Social media checks will be carried out by a third party provider using publicly available information relevant to the role applied for.

8. Risk Assessment

If information arises during the recruitment and selection process that may impact the successful applicant's suitability for the role, a formal, documented risk assessment must be conducted by the Hiring Manager and a HR Business Partner before a final decision is made. For tier one and tier two roles the risk assessment must be signed-off by the Head of Safeguarding and Chief People Officer.

9. Decision

Once all pre-employment vetting and suitability checks have been successfully completed and deemed satisfactory, the offer of employment will be formally finalised. In cases where a conditional offer of employment is withdrawn due to concerns arising from the recruitment process, the applicant will be informed in writing outlining the reasons for the decision, ensuring transparency.

10. Probationary Period

All successful applicants must complete a probation period, during which their suitability for the role will be assessed. The line manager must conduct regular reviews to evaluate performance and conduct. Any concerns regarding capability, behaviour, or Safeguarding must be addressed promptly. Probationary periods can be extended where necessary.

11. Onboarding

All staff must attend the Club Induction process to ensure familiarisation with policies and procedures, expected standards of practice and behaviour, the role and responsibilities of designated Safeguarding staff and how to contact them (including out-of-hours and emergency contacts). All staff will complete the Premier League Introduction to Safeguarding elearning module. Staff in tier one and tier two roles must also attend a department specific induction meeting with their Safeguarding Manager to understand requirements under the Premier League's Guidance for Safer Working Practice.

12. Training

All staff will attend regular training as required by their role and documented in the Clubs Workforce Development plan.

13. Repeat Checks

DBS checks must either be reapplied for or verified via the DBS Update Service at least every three years.

Before confirming any changes to responsibilities (including through promotion) appropriate vetting checks must be carried out where the individual has not previously been assessed for such work, to ensure their suitability for the role.



14. Self-Reporting

Staff contracts require the self-reporting of any relevant enquiries or investigations (criminal or otherwise) that may affect an individual's suitability to work with Children or Adults at Risk. This is also documented in the Club's Low Level Concerns Policy.

Safer Recruitment Procedure