



COVENTRY CITY FOOTBALL CLUB LIMITED

## Safer Recruitment Policy

...LET'S ALL SING TOGETHER

#PUSB 

## **1. Aims and Vision**

This document sets out the Club's policy and the procedures to be followed where there is a need to recruit a new staff member into the Club. The information provided here serves as a guide only, and it is important that Line Managers keep the senior management of the Club and HR up to date regarding future recruitment intentions. In all cases, the guidelines promulgated in the EQUAL OPPORTUNITIES POLICY should also be followed.

This policy applies to all recruitment and includes casual staff, volunteers, and interns where stated.

The purpose of this Safer Recruitment and selection policy is to ensure the practice of safe and equitable recruitment and deployment of staff and volunteers, ensuring the process is conducted in a fair, effective, and economic manner and to ensure those that are responsible for each stage of the recruitment process demonstrate a professional approach by dealing honestly, efficiently, and fairly with all internal and external applicants.

The Club is committed to attracting, selecting, and retaining the best possible staff who will successfully and positively contribute to providing a valuable service. A motivated and committed workforce with appropriate knowledge, skills, experience, and ability to do the job is critical to the Club's performance and fundamental to the delivery of a high quality of football development.

The recruitment and selection process will seek to identify the person best suited to the role based on the applicant's abilities, qualifications, experience, and merit, measured against a clear job description and person specification for each role.

## **2. Equal Opportunities**

The Club is committed to providing the quality of opportunity for all and to ensuring that all stages of recruitment and selection are consistent, transparent, and fair. The Club has signed up to the [FA's Football Leadership Diversity Code](#) and is working in accordance with the standards set out in the EFL's Code of Practice.

Recruitment and selection procedures will be reviewed on a regular basis to ensure that applicants are not discriminated against on the grounds of race, colour, nationality, gender, religion or belief, age, disability, sex, marital status, sexual orientation, or gender reassignment. The Club will ensure that equal opportunities are promoted in line with its EQUAL OPPORTUNITIES and its EQUALITY & DIVERSITY POLICIES. All candidates will be asked to complete an Equal Opportunities Monitoring Form when applying for roles. This will enable us to monitor the effectiveness of our recruitment strategy and equal opportunities and complete our annual reporting requirements to the FA's Football Leadership Diversity Code.

### **3. Roles and Responsibilities**

It is the responsibility of HR to ensure that the Club has effective policies and procedures in place for recruitment of all staff, contractors, volunteers, and interns in accordance with legal requirements and guidance. HR will also monitor compliance.

It is the responsibility of the Executive Chairman/Director, Chief Executive Officer (SSM), HR, the Academy Manager, Heads of Department, Head of Safeguarding (HOS), Academy Safeguarding Lead (ASL), Designated Safeguarding Officers (DSOs), and others involved in recruitment to ensure that the Club operates safer recruitment procedures and makes sure all appropriate checks are carried out on all staff and contractors who work at the Club, as well as volunteers and interns before the work or volunteering commences.

Responsibilities also include monitoring contractors' and agencies' compliance with this document and ensuring that a focus is maintained upon ensuring a safe and appropriate workforce in line with the Club's commitment to safeguarding and promoting the welfare of children, young people, and adults at risk (see the Club's Safeguarding Policies on the Club's website: <https://www.cafc.co.uk/club/safeguarding>).

All Line Managers should be aware that satisfactory enhanced DBS disclosures must be received for all new staff who are taking up Regulated Positions. The Academy Manager and HR may only authorise a new member of staff to commence work in exceptional circumstances prior to receipt of a satisfactory enhanced DBS disclosure providing that:

- arrangements are in place to ensure that the individual is supervised at all times; and
- the enhanced DBS disclosure has been applied for before the start date; and
- a satisfactory separate barred list check has been completed; and
- a public facing online search has been carried out; and
- a completed Application Form and Self-Declaration Form has been received; and
- all other checks (including requesting written references) have been completed.

Candidates are required to complete an Application Form, Self-Declaration Form, and Equal Opportunities Form when applying for a role with the Club.

### **4. Advertising and the initial process of recruiting**

#### **4.1. Advertising**

The following procedures and practices are in place to ensure the safe recruitment of staff and to ensure equality of opportunity.

The Club will generally advertise vacant posts to encourage a wide and diverse field of applicants as possible. Normally this entails internal and external advertisement in

relevant publications or websites, which may include the Club's own website and social media channels, the FA's central careers platform, and the EFL's iRecruit platform.

Vacancies may also be advertised on other specialist sites dependent upon the role. Any advertisement will include a clear statement of the Club's commitment to safeguarding and promoting the welfare of children as well as the Club's stance on Equality. The Club does not use agencies or third parties for recruitment purposes.

Advertisements will provide relevant links where the Application Form and Guidance Notes, Self-Declaration Form, and Equal Opportunities Monitoring Forms are available. Incomplete applications, applications from third party agencies, and applications by CV only, will not be considered, and this is made clear on all advertisements.

The Club operates a blind recruitment policy for all employed roles. Upon receipt of an application, the name, any personal data, and equal opportunities monitoring information is separated from the application form.

Applicants are advised to put as much information as they wish into the application form which is passed to the shortlisting panel for consideration.

On occasions, a post may not be advertised externally, due to an internal promotion or restructure of roles within the Club.

#### **4.2. Job Description and Criminal Record Checking**

The job description outlines the general nature of the post including the main duties and responsibilities and it will identify the Line Manager for the post. It also incorporates the person specification (qualifications, attributes and skills required) and it is these criteria that are used as short-listing criteria by those scrutinising the applications. Other information included is a description of the department, background information to the post, further details such as deadline date for applications, etc.

The Club endorses the use of The FA Criminal Records Checks (FACRC) through the Disclosure and Barring Service (DBS) via FADV Online to ensure appropriate assessment for clearance for work in football for those working with children, young people, or vulnerable groups.

FADV Online Disclosures administer the criminal records checking process on behalf of The Football Association. This includes those roles which are defined by law as a Regulated Activity, or those roles for which the National Governing Body (NGB), The FA, has identified to require Enhanced Disclosures in football. These are defined as unsupervised roles in football which involve teaching, training and instruction or caring for, and supervising.

The Club complies with the DBS and The FA Criminal Records Body (FA CRB) Code of Practice and seeks to treat all applicants for positions fairly. The Club undertakes not to discriminate unfairly against any subject of a disclosure on the basis of a conviction, or other information revealed.

The Club is committed to safeguarding children, to the fair treatment of its staff/prospective staff and to equality of opportunity for all. We will select candidates for interview based on their skills, qualifications, and experience relevant to the role.

The Club may carry out DBS checks for roles where staff may come into contact with U18s as part of their role.

A DBS disclosure is requested only after consideration has been given to the roles and responsibilities included in the Job Description. Any decision to request a disclosure will be relevant to the position concerned. For those positions where an enhanced disclosure is required, the recruitment documents used will contain a statement that a disclosure will be requested in the event of the individual being offered the position as follows:

*"This post requires Enhanced Criminal Records Checks and checks against the Barred Lists and is exempt from Rehabilitation of Offenders Act (1974). Therefore, all convictions including spent convictions that have not been subject to filtering by the DBS should be declared".*

The definition of 'spent conviction' has changed in recent years, for further information on if a conviction is considered 'spent' go to:  
<https://www.gov.uk/exoffenders-and-employment>

Where a disclosure is to form part of the recruitment process, we encourage all applicants called for interview to provide details of their criminal record, if any, at an early stage in the application process. A self-disclosure form is included in the application pack to support this process.

We request that this information is sent under separate, confidential cover, to the Club's Head of Safeguarding (HOS) [Kirstie.patrick@ccfc.co.uk](mailto:Kirstie.patrick@ccfc.co.uk) or HR [HR@ccfc.co.uk](mailto:HR@ccfc.co.uk) who will be named in the recruitment process. We recognise the importance of confidentiality in relation to this sensitive information and therefore this information will only be seen by those who need to see it as part of the recruitment process.

Having a criminal record will not necessarily prevent an individual from working with the Club. An informed risk assessment of all the information gathered through the recruitment process, including any offending history, will be undertaken in relation to the role and responsibilities applied for before any decision is made about suitability.

More information on the recruitment of offenders through GBG is available at:

[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)

The Club's Head of Safeguarding is Kirstie Patrick, [Kirstie.patrick@ccfc.co.uk](mailto:Kirstie.patrick@ccfc.co.uk)

### **4.3. Application Pack**

The Club's Application Information will supply prospective candidates with the following:

- Club Application Form
- Guidance for Applicants
- Job description set out in the Advertisement
- A Self-Declaration Form
- Equal Opportunities Monitoring Form
- Privacy Policy

The Club uses its own application form. All applicants (both internal and external) are required to complete this form before their application can be considered. This form contains questions about their academic achievements and full employment history. All applicants are required to account for any gaps or discrepancies in employment history and provide reasons for moving between posts. CVs without an application form will not be accepted. There is a short version application form for volunteers and interns.

The application form includes the applicant's declaration regarding convictions and working with children and will make it clear that the post is exempt from the provisions of the Rehabilitation of Offenders Act 1974.

All applicants will be made aware that providing false information is an offence and could result in the application being rejected or summary dismissal if the applicant has been selected and possible referral to the police and other professional regulatory bodies.

The application form should contain all the information the applicant wishes to put forward outlining the applicant's suitability for the role. Applicants will have the ability to upload additional information and evidence of qualifications.

All applicants are requested to provide the contact details of two referees on their Application Form along with consent to contact these referees either before or after an offer is made and accepted.

Where a role is only advertised internally, and the internal candidate is an existing part time or casual employee, the procedures in this policy must be followed and a full application made.

Where a role is only advertised internally, and the internal candidate is an existing full-time employee who has passed their probationary period and is moving to a post by way of promotion or restructure, it is not necessary to supply referees. However, the Club reserves the right to follow the full application process as set out in this policy.

## **5. Received applications and short-listing**

### **5.1. Handling applications**

- All Applications submitted will be received by HR only.
- Applications submitted directly to staff members, incomplete applications, sent by CV only, received via third parties, agents, or agencies, or received after the deadline stated, **will not** be considered.
- All applications should be initially scrutinised by a member of staff who has completed safer recruitment training. This is usually HR.
- Any applicant who has not completed the Club's application form in full will be asked to do so if they wish to have their application considered.
- HR will be responsible for collating a list of all applications as they arrive and allocating them with a Code. The front and last page of the application form, Self-declaration Form, any covering email/letter, and Equal Opportunities Form containing identifiable personal information will be removed, as the Club operates a blind recruitment policy. The EFL's online iRecruit portal will do this automatically.
- Complete and valid applications will be stored in a secure folder on the Club's SharePoint and access given to the short-list interview panel, and HR only.
- All those involved in the short-listing process have a responsibility to scrutinise the application forms and letters of application carefully. In addition to judging the application against the criteria for the post, anyone noticing an anomaly should make a written note to that effect.
- An appropriate member of the senior management team will have specific responsibility for ensuring that a thorough scrutiny of the application has taken place, as per safer recruitment guidelines, prior to the interview. This should include a month-by-month record of employment since leaving education/school to the present date. Any gaps should be noted and followed up either immediately before or at interview. This scrutiny will form part of the specific questions regarding safeguarding during the formal interview process.

### **5.2 Shortlisting**

Following the closing date, a panel will independently scrutinise the blind applications further using a selection matrix when necessary (a simple format, cross-referencing candidates against the criteria in the job description and the person specification).

In addition to judging the application form against the criteria for the post, anyone noticing an anomaly in the information provided will make a written note to that effect to be followed up at interview if applicable.

The final shortlist will be drawn up at a short-listing meeting. In the case of a coaching vacancy this meeting will normally be chaired by the Academy Manager, First Team Manager, or Chief Executive Officer. In the case of non-football staff it will be the relevant Head of Department and/or HR.

The short-listing meeting normally takes place within five days of the closing deadline. All those involved in the interview process should attend this meeting. Those unable to do so should send written recommendations to this meeting on the selection matrix.

Only those candidates that meet the requirements of the role will be shortlisted. Due to the volume of applications received non-shortlisted candidates will not be contacted as advised on the advertisement.

The Code numbers of the shortlisted applicants will be passed to HR.

## **6. Online Searches**

The Club will carry out a public facing online search of all the candidates who have been shortlisted for interview.

The search will extend to a Google search and any social media handles (Facebook, Twitter, and Instagram) plus any other online information that appears from the initial search.

The findings of the online search will be passed to the interview panel.

## **7. Interview Process**

All short-listed candidates are contacted by email to invite them to attend an interview and to ensure their availability.

An interview panel will be selected, and interview questions prepared relating to the role and job description.

The candidate will be required to demonstrate their skill in the area advertised by way of a presentation, case study, or a possible demonstration to the interview panel.

Dependent upon the role, there may be a multi-stage interview process which may include any of the following:



1. Video interview (MyInterview) where candidates are required to respond on video to a series of short questions.
2. First interview, which may take place with HR or by the interview panel, which may be conducted in person or via Zoom.
3. Final interviews will be conducted face to face.
4. Applicants interviewed for Senior Management roles will also have an interview with the Club's Executive Chairman.

### **7.1. Interview Programme**

The interview process will explore the applicant's ability to carry out the job description and meet the person specification and will take place face to face.

The programme normally includes:

- Tour of the department or area that the individual is going to work within
- Practical exercise – Coaching, Physio or Sport Science – usually observed by the Head of Department
- Interview
- Feedback on case study if appropriate

Core questions to be asked of all candidates will be agreed by all interviewers prior to interview to ensure consistency, as well as any specific questions relating to an individual's application. A question or questions relating to Safeguarding will also be included.

### **7.2. During the Interview**

Candidates will always be required to:

- explain satisfactorily any gaps in employment or significant periods of time working or living abroad
- explain satisfactorily any anomalies or discrepancies in the information available to the interviewers
- declare any information that is likely to appear on a criminal record disclosure
- demonstrate their capacity to safeguard and protect the welfare of children and young people
- explain any issues that have arisen during the online search.

A record will be made of responses and of any questions asked by the interviewee.

During the interview process relevant qualifications etc., will be scrutinised and checked by the Academy Manager and/or HR. Copies taken will be dated and signed to show that originals have been seen.

Any information in relation to past disciplinary action, allegations, cautions, investigations, or convictions will be discussed and considered in the circumstances of the individual case during the interview process.

## **8. Candidate Selection**

### **8.1. Final Selection Meeting**

This is held as soon as possible after the interview candidates have departed. This meeting involves all those involved in the selection/interview process.

A record of decision making to appoint an individual ahead of others must be noted, to ensure that there is a record to provide clear honest feedback to the unsuccessful candidate/s if required.

Whilst the Club is seeking to have a more diverse workforce in accordance with the targets set by the FAs Leadership Diversity Code, the final selection is always made by the panel to appoint the best candidate who holds the relevant qualifications, and meets the essential criteria for the role.

Interviewers bring any notes they have made with them (including presentation/demonstration observations if applicable); these are collected and put with the application file at the end of the process. All notes are stored for a minimum of 6 months.

Notes regarding the successful candidate are transferred to their personnel file.

### **8.2. References**

Written references of applicants will only be taken up upon acceptance of an offer of employment, (unless the candidate has indicated otherwise on their application form), which is subject to conditions, including receipt of satisfactory written references.

Referees are sent the candidate name, and role offered.

Referees must include a recent employer as well as one other reference from either an employer, tutor or individual of professional standing, who is able to indicate whether the applicant is suitable and appropriate to work with children or young people, if relevant to the role applied for. Open references or references that are solely character references from close family members, friends or Club employees are not acceptable.

Where a written reference appears inadequate or incomplete, invites further contact, or contains conflicting information, contact should be made by a designated member of staff by telephone, to probe further.

References will not be sought for internal candidates who have already worked for the Club on a permanent basis and completed their probationary period. However, if a part-time casual employee applies for a full-time role, a full application and references will be required in accordance with this policy.

Before an applicant can commence a role, two references must be requested and at least one received in response prior to their start date. Outstanding references will be chased, or another referee requested from the applicant. All applicants will be supervised until both references and DBS are received.

### **8.3 Contacting Referees by telephone**

If there are any queries around information provided on a written reference, and where appropriate and necessary, direct contact will be made to speak with the referee in order to explore further areas on the written reference that require further clarification before evaluating the response.

An accurate record of the telephone call should be made (the written references should be annotated, dated, and initialled).

### **8.4 Communicating the outcome**

The Academy Manager, First Team Manager, HR, or appointed member of the recruitment team will telephone the successful candidate as soon as possible and offer the position verbally, subject to the conditions of employment as set out below.

If verbal acceptance is received, the offer letter of employment is sent to the successful candidate by email (or DocuSign) along with employee starter information.

Upon receipt of a signed offer of acceptance, written references are then requested, and a DBS application made (an enhanced DBS for regulated roles). The contract of employment is drafted by HR and issued to the successful candidate.

All written offers (including those made by email) must be sent by HR and state that it is a provisional offer, subject to conditions which includes the receipt of satisfactory references and criminal record (DBS) checks. Where these have not been confirmed it will also state that the offer is subject to verification of identity, proof of right to work in the UK, presentation of original copies of any qualifications having been seen and confirmation of medical fitness for the post (if appropriate).

When a letter of acceptance of offer is received, unsuccessful short-listed candidates will be notified.

If the successful candidate declines the offer of the post, the selection committee reconvenes. The post may be offered to a second-choice candidate or re-advertised.

Due to the volume of applications received, only those candidates short listed for interview will be contacted.

## **9. New employee administration and induction**

A checklist will be used to track and audit paperwork obtained in accordance with Safer Recruitment guidelines. This checklist will be retained on personal files.

### **9.1. Pre-employment vetting checks and commencing employment**

A new appointee should not commence employment until all criteria have been met as set out in this policy. The process of checking qualifications, verifying identity and prohibitions, suitability of a newly appointed member of staff must be logged carefully on the Club's Single Central Register (Sentry) and vetting checks determined by whether an individual will be involved in regulated activity.

All staff and managers will be checked for the following:

- those that have been prohibited from participating in Football
- those that have failed to successfully complete their induction or probation period
- those that may be the subject of a suspension or conditional order imposed by the Football Association that is still current.

### **9.2. The Single Central Record**

In addition to the various staff records kept in the Club and on individual personnel files, a single central record of recruitment and vetting checks is kept in accordance with EFL requirements. The Club uses Sentry for this purpose. This is kept up-to-date by the Head of Safeguarding (HoS) and Academy Safeguarding Lead (ASL)

The single central record contains details of the following:

- all employees who are employed to work at the Club
- all employees who are employed as staff to the Club whether employed directly or on a voluntary basis
- all others who have been appointed to positions by the Club which have regular contact with children and young people. This will cover volunteers, staff and people brought into the Club to provide additional coaching or instruction for pupils but who are not staff members eg sports coaches, guest speakers etc.

### **9.3. Vetting checks, Identity checks and Right to Work**

All applicants invited to attend an interview at the Club will be required to bring their identification documentation such as: passport; birth certificate, driving licence etc. with them as proof of identity/eligibility to work in the UK in accordance with those set out in the Immigration, Asylum and Nationality Act 2006 and the DBS Code of Practice Regulations.

Copies of these original documents should be taken, dated, and signed to verify that the originals have been seen and these should be retained on personnel files.

Employees of the Club may be engaged in regulated activity and therefore the Enhanced DBS Disclosure, including barred list check will be required (see section **4.2.** above).

The HOS or ASL will write directly to the successful candidate regarding arrangements for an enhanced disclosure application from the Disclosure and Barring Service (DBS). This is before any start date, and as soon as practicable after an appointment, but no earlier than three months before employment commences. The Club pays for this check.

It is the Club's policy to require all staff and volunteers to renew their DBS check every 3 years, or whenever they change roles within the Club. This is in line with recommended good practice by the Football Association and English Football League (EFL). Parallel entries of subsequent DBS checks will be recorded on the Single Central Register.

Members of staff at the Club should be made aware of their obligation to inform the Academy Manager and HR of any cautions or convictions that arise between these checks taking place. Any employee who is convicted of, or cautioned for, any offence during their employment must immediately notify in writing HR or Head of Safeguarding of the offence and penalty. This requirement will be integrated into their contract terms.

The Club will require all staff to complete an annual Self-Declaration Form on or before 1<sup>st</sup> July each year (EFL YD2 Form).

### **9.4. Barred List**

A separate Barred List check must be undertaken in the event that an enhanced disclosure is not received in advance of a member of staff starting work in regulatory activity. It is illegal for the Club to employ anyone who is on the Barred List.

## **9.5. Qualifications**

New employees will be asked to bring in original documents or certificates of relevant registration, training, or qualifications so that copies can be lodged on their personnel file.

## **9.6. Disqualification**

Under the Childcare Act 2006 and the Childcare (Disqualification) Regulations 2009 staff can be disqualified, including by association, from working in or being concerned in the management of childcare. Any employee likely to fall into this category completes a declaration form and is asked to keep the Club informed of any changes in their personal circumstances. Annual written reminders of this requirement are sent with the EFL YD2 form.

The Club's Lead Disclosure Officer is Kirstie Patrick (HOS).

## **9.7. Induction**

All new staff new will be required to undertake induction training. This will include:

- induction meeting and briefing with their line manager
- safeguarding training
- provision of key safeguarding policies: the staff code of conduct; equality policy; and the whistleblowing policy
- health and safety training
- any specific training relevant to their role

All new staff will be provided with logins to the Club's Safeguarding training portal and to MyConcern.

## **9.8. Record Retention/Data Protection**

All interview notes for applicants will be retained for a period of 6 months after which time the notes will be destroyed (i.e. shredded). The six-month retention period is in accordance with the Data Protection Act 1998 and will also allow the Club to manage and respond to any data access requests, recruitment complaints or to respond to any complaints made to an employment tribunal. All personal sensitive data is retained in accordance with GDPR requirements.

## **9.9. Ongoing Employment**

All employees are subject to a 6-month probationary period. If a current staff member moves to another role, then a probationary period may apply.

It is recognised that safer recruitment and selection is not just about the start of employment but should be part of a larger policy framework for all staff. The Club will therefore identify and provide appropriate ongoing training and support for all staff, as identified through the annual review/appraisal procedure. This will include training on Safeguarding, Equality & Diversity and Health & Safety as well as training relevant to the role.

### **9.10. Monitoring**

The Academy Manager, HOS, ASL, SSM and HR hold responsibility for monitoring the implementation of this policy and the single central register.

### **9.11. Leaving Employment**

All staff leaving employment will be invited to complete an exit questionnaire to be completed by the employee and Line Manager. This will be forwarded to HR for retention and monitoring purposes. A copy will also be included in the individual's personnel file.

### **9.12. Use of Contractors**

Contractors that are used within the Club should comply with the Club's safeguarding and safer recruitment requirements.

### **9.13. Volunteers and Interns**

Volunteers and Interns who are working within the Club will be subject to the same employment and vetting checks as paid staff, subject to assessment of their role and responsibilities and whether they will be working in any unsupervised capacity.

Volunteer roles will be assessed to see whether they fall within regulated activity and, if so, they will be subject to completion of identity checks, and an enhanced disclosure from the DBS will be applied for. They will also be asked for a written tutor reference and will require an interview. All checks carried out will be recorded on the single central register.

Regular volunteers receive a letter of agreement confirming that they will not be asked to take sole responsibility for any individual players or teams and that they should always have the support of a member of staff and work under their supervision, support, and guidance. The allocated member of staff is identified in this letter.

All volunteers are required to read the Volunteer Code of Conduct and the Safeguarding Policy to acknowledge in writing that they have understood these and agree to comply with them.

Should a volunteer be offered a paid position at any time, they must complete a full application and references will be taken.

## 10. Club Contacts

All Club contacts are available in the Club's Safeguarding Organisation Chart or by contacting HR: [HR@ccfc.co.uk](mailto:HR@ccfc.co.uk)

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## Review History

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1	Feb 2019	Development and creation of document.	Sandra Garlick (HR)	Tim Fisher, Director
2	Aug 19	Review and update	Sandra Garlick (HR)	Tim Fisher, Director
3	Nov 20	Review and update	Sandra Garlick (HR)	Tim Fisher, Director
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