

Scope

This policy applies to all Norwich City Football Club (“**Club**”) colleagues, including those on temporary contracts, contractors, suppliers or who have been working at the Club through a recruitment agency.

This policy supersedes any previous policies prior to its issue date.

Club Statement - Equal Opportunities

The Club endorses the principle of equality and will strive to ensure that everyone who wishes to be involved in the Club has a genuine and equal opportunity to participate to the full extent of their own ambitions and abilities and can be assured of an environment in which their rights, dignity and individual worth are respected.

Policy Statement

The Club is dedicated to providing and encouraging equal opportunities to all and eliminating any forms of discrimination relating to the following:

- age;
- disability;
- gender reassignment;
- marriage and civil partnership;
- pregnancy and maternity;
- race;
- religion or belief;
- sex; and
- sexual orientation (together, the “**protected characteristics**”).

As a Club we aim to be truly representative of all sections of society. The Club commits to encouraging equality, diversity and inclusion within the workplace by creating working environments free from bullying, harassment, victimisation and unlawful discrimination by promoting dignity and respect for all.

This commitment includes, but is not limited to;

- Having a culture of zero-tolerance on abuse, unlawful discrimination, bullying, harassment and victimisation;
- Dealing with complaints of abuse, unlawful discrimination, bullying, harassment, and victimisation seriously and timeously;
- Implementing reasonable adjustments, and provisions to ensure staff do not receive unfavorable treatment and are not put at a disadvantage;
- Monitoring recruitment and selection methods;
- Training Managers and employees about their rights and responsibilities;
- Providing equal opportunities;
- Challenging unconscious bias;
- Making opportunities available for training, development and progress to all staff;
- Developing policies and procedures to ensure they do not discriminate unlawfully because of any of the protected characteristics;
- Monitoring the make-up of the workforce regarding protected characteristics to encourage equality, diversity and inclusion;
- Ensuring all activities promote positive equality, diversity and inclusion.

Each member of staff is expected to adhere to this policy and procedure to ensure that a positive equal, diverse and inclusive opportunities climate exists.

Procedure

The principles set out in this procedure refer to situations at work and also situations where you are identifiable as an employee, agency worker or third party working on behalf of the Club. This includes, but is not limited to, overseas tours; business networking events; award events; any time when wearing the Clubs clothing or ID badge; and any other direct means of association with the Club. This list is not exhaustive.

Equality, Diversity and Inclusion Definitions

Equality; is ensuring individuals or groups of individuals are not treated differently or less favourably, based on their specific protected characteristic.

Diversity; is about recognising differences. It is acknowledging the benefit of having a range of perspectives in decision-making and the workforce being representative of the Club's customers.

Inclusion; is where people's differences are valued and used to enable everyone to thrive at the Club. An inclusive working environment is one in which everyone feels that they belong without having to conform, that their contribution matters and they are able to perform to their full potential, no matter their background, identity or circumstances. An inclusive workplace has fair policies and practices in the place and enables a diverse range of people to work together effectively.

Types of Discrimination

There are different types of unlawful discrimination. They are detailed below coupled with illustrative examples:

Direct discrimination; arises when a person is treated less favorably because of a protected characteristic. It is important to realise that an individual does not actually have to have the characteristic themselves in order to suffer direct discrimination. It will also be unlawful if they are less favorably treated because they are thought to have the characteristic, or because someone they know has the characteristic. Examples of direct discrimination would include the following:

- A woman with young children is not employed because it is feared that she might be an unreliable member of staff.
- A man is dismissed because he has a paraplegic wife.
- A Sikh applicant for a senior post is turned down because it is feared he will not "fit in" with an existing team.
- A man is not given a pay rise because a homophobic Manager assumes the employee is gay (even though he is heterosexual).
- A visually impaired person is turned down for a job because of a mistaken assumption that such people are unable to use computers.

Indirect discrimination; occurs when an apparently neutral requirement is applied which is more difficult for members of certain groups to meet and which cannot be justified on objective grounds. Examples of indirect discrimination are set out below:

- A policy that no members of the workforce can work part-time could constitute indirect discrimination as a higher proportion of women than men may choose to work on a part-time basis to meet caring responsibilities. It may not be justified if the employer's business needs can still be met by more flexible working arrangements.
- A requirement that an applicant must be a "recent graduate" may be indirect age discrimination against older workers. This could only be justified if asking

for someone who has recently left university is a proportionate means of achieving a legitimate aim.

- A requirement for GCSE English as a selection criterion. This requirement would be harder for people who have been educated overseas to meet and may not be justified if all that is really needed is the ability to demonstrate a reasonable level of literacy. It might also be more difficult for older workers to meet as GCSEs were only introduced in the late 1980s.

Discrimination against disabled people; can also occur where a person is unfavorably treated because of something arising in consequence of his or her disability or where an employer fails to make a reasonable adjustment to accommodate the needs of a disabled person. It is important to realise that it is not only people who are visibly disabled who fall within the definition of people who are disabled. The definition extends to anyone who has a serious physical or mental impairment which has lasted a long time and has a significant impact in their ability to perform normal activities. Examples include:

- A requirement for a member of staff to hold a driving license for a job which involves little travelling.
- Failure to recruit someone with hearing difficulties for a job which requires spoken communication without first considering whether suitable adjustments can be made to working arrangements.

Victimisation; occurs when a person is subjected to a detriment because he or she has taken or intends to take action to assert the rights conferred by equality legislation or because he or she has assisted someone else with their complaint (for example by providing evidence).

Harassment; occurs when a person is subjected to unwanted conduct (whether physical, verbal or non-verbal) related to a protected characteristic which has the purpose or effect of violating that person's dignity or making the work environment hostile, intimidating or offensive for that person. Please refer to the Club's Harassment Policy for more details.

Zero Tolerance

The Club has a zero-tolerance culture relating to any forms of inequality, abuse, harassment, bullying, victimisation, exclusion or unlawful discrimination made by members of staff or the public.

Where members of staff fail to comply with this policy and procedure, they will be investigated in accordance with the Clubs Disciplinary Policy and Procedure.

The Club will take immediate and appropriate action if members of the public breach ground regulations or display acts of inequality, abuse, harassment, bullying, exclusion or discrimination directly or indirectly towards a Club staff member. If staff members experience any undue or unlawful conduct made by the public, they are required to make their Line Manager aware immediately and remove themselves from the situation if they feel unsafe. The Club will investigate the matter accordingly and implement relevant action plans such as reporting the incident to "Kick it Out" and/or to the police and educating the parties concerned.

Unfair Treatment - Complaints

If staff feel that they are being treated unfairly or have witnessed unfair treatment, they should raise a grievance through the Club's Grievance Policy and Procedure. If it is felt inappropriate for a staff member to approach their Manager, they may approach an independent member of management or the Human Resources Department. In cases of bullying and/or harassment the procedures set out in the Club's Harassment Policy should be used.

Reasonable Adjustments

To ensure practices remain justifiable and lawful the Club will aim to make the necessary reasonable adjustments relating to all protected characteristics. This includes, but is not limited to, physical features and environmental adjustments in relation to any of its premises ensuring fairness and equality for potential employees, current employees and third-party contractors associated with the Club.

The Club will take all reasonably practicable steps to ensure staff are able to participate in its business activities on an equal basis. You are encouraged to tell the Club if you need appropriate support/reasonable adjustments so that this can be provided.

Recruitment and Selection

The Club aims to ensure that job applicants do not suffer unlawful discrimination. Recruitment procedures are reviewed regularly, in line with the Equality Act 2010 and Safer Recruitment Guidelines, including but not limited to, to ensure that individuals are treated based on their relevant merits and abilities.

Job selection criteria is regularly reviewed to ensure that they are relevant to the job and are not disproportionate. Shortlisting of applicants is undertaken by more than one person. Job advertisements will avoid stereotyping or using wording that may discourage groups with a protected characteristic from applying.

Applicants will not be asked questions about health or disability before a job offer is made unless those questions are permitted by law, for example, to establish whether reasonable adjustments might be required for an interview or other selection process, or for equal opportunities monitoring.

The Club requests equality and diversity data from all applicants on a voluntary basis when applying for a position and will regularly review shortlisting as the recruitment process progresses. The information is kept in an anonymised format and retained solely within the Human Resources department. The data is used to support the Club to take appropriate steps to avoid discrimination and improve equality, diversity and inclusion.

The Club is required by law to ensure that all employees are entitled to work in the UK. Assumptions about immigration status will not be made based on appearance or apparent nationality. All prospective employees, regardless of nationality, must be able to produce original documents before employment starts, to satisfy current immigration and right to work legislation.

Training, promotion and terms and conditions

Employees will be given appropriate access to promotions and training to enable them to progress. All decisions will be made based on merit, ability and job suitability coupled with transparent and justifiable methods.

Workforce composition and promotions will be monitored to ensure equality of opportunity at all levels of the Club. Where appropriate, steps will be taken to identify and remove unjustified barriers and to meet the needs of disadvantaged or underrepresented groups.

Terms and conditions, benefits and facilities will be reviewed regularly to ensure that they are available to all staff who should have access to them and that there are no unlawful obstacles to accessing them.

Equality, Diversity & Inclusion and Unconscious Bias Training

The Club will proactively deliver compulsory Equality, Diversity and Inclusion training combined with Unconscious Bias training to all staff in the form of inductions.

If there are concerns with conduct that may cause unfair or unlawful treatment within the Club then individual or group training will take place immediately and without delay.

Development of Policies and Procedures

The Club will ensure that all policies and procedures are inclusive and are not unfair or unjustifiable to groups with protected characteristics. Policies and Procedures are governed by the Human Resources and Legal departments.

The Club will ensure that redundancy criteria and procedures are fair and objective and are not unlawfully directly or indirectly discriminatory. The Club will ensure Absence and Wellbeing, Performance Management and Disciplinary Policy and Procedures penalties are applied without unlawful discrimination or unconscious bias.

Unconscious Bias

The Club recognises that unconscious bias occurs when people favour others who look like them and/or share their values (as we receive information all the time from our own experiences and what we read, hear, or see in the media etc) and that everyone has an unconscious bias. The Club recognises the need to proactively mitigate unconscious bias as it can inadvertently influence recruitment, promotion, staff development and recognition leading to less diverse workforce.

Where unconscious bias is against a protected characteristic, it can be unlawfully discriminatory. The Club therefore aims to challenge stereotyping and prejudice openly and to mitigate this through:

- Being aware of unconscious bias.
- Not rushing to make decisions and considering issues fully.
- Justifying decisions based on evidence and recording the reasons for decisions e.g. recruitment and disciplinary outcomes.
- Encouraging staff to work with diverse groups of people and getting to know them as individuals, such as working within different teams, premises etc.
- Focusing on the positive behaviour of people and not the negative stereotypes.
- Implementing Policies and Procedures which limit the influence of individual characteristics and preferences.

Monitoring Activities

To ensure that this policy and procedure is operating effectively, and to identify groups that may be underrepresented or disadvantaged, the Club monitors applicants', employees and associated members of the Clubs age, disability, gender reassignment, marriage or civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. Provision of this information is voluntary, and it will not affect an individual. All data is held in accordance with the Data Protection Policy and Procedure.

Outreach Activities - Monitoring

As part of the Club's social responsibility we positively promote staff to engage with the community and participate in outreach activities. We therefore actively monitor participation and diversity of activities to identify groups that may be underrepresented or disadvantaged.

Reporting

If anyone suspects or has any concerns around bullying, harassment, victimisation and/or unlawful discrimination at the Club then please contact the Club Solicitor or the Head of Safeguarding. In the event that anonymity is preferred then a referral can be made via the Club's website.

Responsibility and Key Contacts

The board of directors has overall responsibility for the effective operation of this policy and for ensuring compliance with equality legislation. Day-to-day operational responsibility has been delegated to the Human Resources Department.

All Managers must set an appropriate standard of behaviour, leading by example and ensuring that those they manage adhere to this Policy and Procedure. Managers will be given appropriate training on equal opportunities awareness and equal opportunities recruitment and selection best practice.

Associated Policies

Harassment Policy and Procedure
Grievance Policy and Procedure
Disciplinary Policy and Procedure
Whistleblowing Policy and Procedure

Policy Issue Date **February 2020**

Date of Next Update **February 2021**

This policy is next due for a general review on the above date. It may however be reviewed and updated earlier, in the event of a change in Club requirements, or relevant legislation.

This policy is reviewed regularly by the Human Resources Department. Recommendations for change should be reported to the Human Resources Department.

The Club will continue to review the effectiveness of this policy to ensure it is achieving its objectives.