



# Equality Policy

Approved By

Phil Alexander: Chief Executive Officer

DATE: 18/12/17

Approved BY

Peter Swordy: Operations Director

DATE: 18/12/17

## **Document History**

### **Revision History**

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

<b>Revision Date</b>	<b>Author</b>	<b>Version</b>	<b>Summary of Changes</b>
December 2017	Soye Briggs	V1.1	Revised Version
January 2016	Sara Niblock	V1.0	First Publication

### **Approvals**

This document requires the following approvals:

<b>Name</b>	<b>Version</b>	<b>Date of Approval</b>
Phil Alexander CEO CPFC	V1.1	18 <sup>th</sup> December 2017
Peter Swordy Operations Director	V1.1	18 <sup>th</sup> December 2017
Soye Briggs Equality Lead	V1.1	18 <sup>th</sup> December 2017

### **Alternative Formats**

If you would like this policy in an alternative format please contact the Club's Equality Lead. Contact details can be found at the end of the policy

## **Statement from the board**

**Crystal Palace Football Club is committed to identify, confront and eliminate discrimination, whether by reason of race, colour, nationality, religion or belief, sex, sexual orientation, marital or civil partner status, age, ethnic and national origin, pregnancy or maternity, disability or gender reassignment.**

**Crystal Palace Football Club intends to ensure that everyone who wishes to engage with the club, whether as match-days fans, staff, players, board members, participants in foundation programmes and any other person engaged with the clubs activities, has a real and equal opportunity to do so.**

**Crystal Palace Football Club is an equal opportunities employer. We aim to ensure that all employment decisions are taken without reference to irrelevant or discriminatory criteria, and that staff feel valued and are able to achieve their full potential**

## **Equality Statement**

Crystal Palace Football Club endorses the principle of equality and will strive to ensure that everyone who wishes to be involved in the club whether as players, match-day fans, staff, board members, participants in foundation programmes and other people engaged with the club's activities (for example, suppliers, corporate partners) Has a genuine and equal opportunity to participate to the full extent of their own ambitions and abilities, without regard to their age, disability, gender reassignment, marital or civil partnership status, pregnancy or maternity, race, religion and belief, sex or sexual orientation; and can be assured of an environment in which their rights, dignity and individual worth are respected, and in particular that they are able to enjoy their engagement at the club without the threat of intimidation, victimisation, harassment, bullying and abuse.

## **Legal obligations**

### **Equality Act 2010**

Under the Equality Act 2010, in the United Kingdom it is potentially unlawful to discriminate in relation to age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, gender or sexual orientation, which are known as Protected Characteristics. This means that individuals will be protected if they have a Characteristic, are assumed to have one or more, associate with someone who possesses one or more or are with someone who is assumed to possess one or more Characteristic(s).

Crystal Palace Football Club is committed to avoiding and eliminating unfair discrimination of any kind in the club, and will under no circumstances condone unlawful discriminatory practices. The organisation takes a zero tolerance approach to harassment, victimisation or bullying. Examples of the relevant legislation and the behaviours in question are given in the Appendix.

## **Positive Action**

As well as complying with legislation we will promote equality by taking positive steps to counteract the effects of physical or cultural barriers – whether real or perceived – that restrict the opportunity for all sections of the community to participate equally and fully.

Crystal Palace Football Club will therefore seek to institute, support or contribute to appropriate measures or initiatives that enable access to our club, as well as require participation in associated activities by people from any group that is under-represented in the club or has difficulty accessing it.

## **Modern Slavery**

Crystal Palace Football club has a zero-tolerance approach to modern slavery and is committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery and human trafficking throughout our supply chains and other business contacts, consistent with our disclosure obligations under the Modern Slavery Act 2015. By promoting equality throughout the organisation, more workers will be protected and service users will have greater confidence in the goods they buy and services they use

## **Implementation**

The following steps will be taken to publicise this policy and promote equality in Crystal Palace Football Club:

- A copy of this document will be published on the Crystal Palace Football Club website
- The Crystal Palace Football Club board will take overall accountability for ensuring that the policy is observed
- The Board will take full account of the policy in arriving at all decisions in relation to activities of the club Crystal Palace Football Club will implement regular audits, surveys or other initiatives designed to assess the level of participation of different sections of the community in the club and will take account of the findings in developing measures to promote and enhance equality in the club.
- Crystal Palace Football Club will provide access to a rolling programme of training for all of its players, staff, board members, and other people engaged with the club's activities to raise awareness of both collective and individual responsibilities

## **Responsibility, Monitoring and Evaluation**

The board will be accountable for ensuring the implementation of this policy. The CEO and the Equality Lead will be responsible for the day to day implementation of equality in the club

The CEO and Equality Lead will review all Crystal Palace Football Club activities and initiatives against the aims of the policy and should report formally on this issue to the Board annually.

The CEO and Equality lead will review any measures or initiatives that Crystal Palace Football Club may institute or take part in to promote and enhance equality in the club, and will report their findings annually to the Board.

The Board itself will review the policy at intervals of no more than three years, (or when necessary due to changes in legislation) in line with the Crystal Palace Football Club policy review process.

## **Complaints and compliance**

Crystal Palace Football Club considers all of the forms of discriminatory behaviour, including (but not limited to) behaviour described in the Appendix as unacceptable, and is concerned with ensuring individuals feel able to raise any grievance or complaint related to such behaviour without fear of being penalised for doing so.

Appropriate disciplinary action will be taken against any player, match-day fan, staff, Board member, participant in foundation programmes and other people engaged with the club's activities who violate the Crystal Palace Football Club Equality Policy.

Any person who believes that he or she has been treated in a way that they consider to be in breach of this policy by a player, match-day fan, staff, board member, participant Foundation programmes and other people engaged with the clubs activities, should in the case of allegations of discriminatory behaviour against the individual or Crystal palace Football club itself, the person may raise the matter by writing directly to Soye Briggs Head of equality Crystal Palace Football Club.

Crystal Palace Football Club will investigate the complaint personally and appoint a person to do this. The investigation will be conducted impartially, confidentially, and without avoidable delay. Any person against whom a complaint has been made will be informed of what is alleged and given the opportunity to present their side of the matter.

The parties in question will be notified of the outcome of the investigation, in writing and reported to the Crystal Palace Football Club Board. If the investigation reveals unacceptable discriminatory behaviour on the part of a person or organisation, Crystal Palace Football Club may impose sanctions on that person or organisation in line with its policies. Sanctions may range from a written reminder concerning future conduct extending to temporary or permanent expulsion from club activities. In deciding what sanction is appropriate in a particular case the board will consider the severity of the matter and take into account any mitigating circumstances.

Where the violation of the Equality Policy by way of harassment, victimisation or discrimination amount to a criminal offence, the appropriate authority will be informed.

In the event that an individual or organisation associated with Crystal Palace Football Club is subject to allegations of unlawful discrimination in a court or tribunal, the board will co-operate fully with any investigation carried out by the relevant lawful authorities and, subject to the outcome, may consider taking action as above in relation to the matter concerned.

### **Equality Action Plan**

Crystal Palace FC's Equality Action Plan (2017-2020) demonstrates our commitment to achieving significant positive change across the company and wider community over the coming three years and beyond. We anticipate the achievement of the objectives outlined in the plan will result in meaningful improvements for all service users, volunteers, Foundation participants, employees, partner companies, contractors, suppliers and players, whilst also ensuring full compliance with the Equality Act 2010.

### **Strategic Objectives**

Our seven equality objectives are designed to improve the organisations commitment to equality and truly be aligned to our Vision of being a truly inclusive club south London and Proud. Our strategic aims will be reviewed on a quarterly basis and will be presented to the club Board the Club Equality Working group and the independent Equality Advisory Group. The strategic objectives have been reviewed and the Equality Action Plan has been revised to align better in terms of the direction we want take over the next 3 years. They are as follows

<b>Strategic objective</b>	<b>Outcome</b>
1. Momentum on Equality is maintained through the fabric of the club	1. CPFC Equality Action Plan is maintained, Reviewed & updated 2.Regular updates of progress are presented to the board and a regular basis
2. Excellent understanding of demographic data in relation to staff and fan base, responding to trends and analysis of data.	1. Undertake Audit of staff, Players, Board, match day fans and outreach programmes 2. Analysis of results from Audit Surveys 3. Actions from Analysis & feedback from data to be added to Club EAP to reflect current trends
3. Training & Development is embedded and monitored across the club	1. Improve the Club workforce understanding of issues relating to equality 2. List additional specific training relevant to targeted staff roles

	<p>3. Deliver Equality messages and training to outreach programmes and Match day Fans</p> <p>4. The Board understands its responsibility towards equality</p>
4. Promote Equality through our Policies, Strategies and Plans	<p>1. Increase diversity of Board and club workforce</p> <p>2. Understand the impact of our policies, services, strategies and plans</p> <p>3. A robust reporting system is in place for discrimination incidents</p>
5. Promote and deliver activities which work towards increasing the diversity of the CPFC	<p>1 All marketing/Communications and promotion are inclusive and use appropriate range of channels.</p> <p>2. Continued Improvements in terms of Ground accessibility</p> <p>3. Promote and run Equality events &amp; Activities</p>
6. Monitoring & Evaluation in Club's approach to equality is embedded.	1. Monitoring and evaluation methods are in place to assist development of current and future work at the club
7. Club is supported by a strong and active consultation group	1. Consultation process with key stakeholders and partners is established.

## **Reporting Discrimination**

### *Service Users*

A service user is defined as a customer or patron of Crystal Palace football club. We strive to create an inclusive, welcoming and safe environment for all service users and provide services in a fair and equitable manner. The Club actively encourages service users to report any discriminatory behaviour for investigation in line with the Club's complaint procedure which is available from our website

### *Club or Foundation Employees or Volunteers*

An employee is defined as an individual who works part-time or full-time under a written contract of employment who receives a wage or salary and has recognised rights and duties. Crystal palace football club aims to ensure that all employees are valued equally and supported to reach their full potential. Staff members who believe that have been directly or indirectly discriminated against either by third parties or fellow employees should refer to the Club's Discrimination Reporting Procedure for further detail.

## **Key Contacts**

Soye Briggs  
Head of Equality  
[equality@cpfc.co.uk](mailto:equality@cpfc.co.uk)

Sharon Lacey  
Head of Customer Service  
[Sharon.Lacey@cpfc.co.uk](mailto:Sharon.Lacey@cpfc.co.uk)

Peter Swordy  
Operations Director  
[Peter.Swordy@cpfc.co.uk](mailto:Peter.Swordy@cpfc.co.uk)

## **APPENDIX – Relevant legislation and forms of unacceptable discrimination & key contacts**

### **Legal rights**

#### **Discrimination has been legally defined through the Equality Act 2010.**

In April 2010, the Equality Act 2010 received Royal Assent. The Equality Act 2010 is a law which harmonised where possible, and in some cases extended, protection from discrimination. It applies throughout the UK and came into force in October 2010.

Discrimination refers to unfavourable treatment on the basis of particular characteristics, which are known as the 'protected characteristics'. Under the Equality Act 2010, the protected characteristics are defined as age, disability, gender reassignment, marital or civil partnership status, pregnancy and maternity, race, religion or belief, sex (gender) and sexual orientation.

Under the Equality Act 2010, individuals are protected from discrimination 'on grounds of' a protected characteristic. This means that individuals will be protected if they have a characteristic, are assumed to have it, associate with someone who has it or are with someone who is assumed to have it.

Forms of discrimination and discriminatory behaviour include the following:

#### **Direct discrimination**

Direct discrimination can be described as less favourable treatment on the grounds of one of the protected Characteristics.

#### **Indirect discrimination**

Indirect discrimination occurs when a provision, criterion or practice is applied to an individual or group that would put persons of a particular characteristic at a particular disadvantage compared with other persons.

#### **Associative discrimination**

Discrimination can also occur when someone discriminates against someone because they associate with another person who possesses a protected characteristic. An example of this is if 'A' does not give 'B' – a job applicant, for example – the position, even though they have met all of the competencies for the role, just because 'B' has told 'A' they have partner with one or more Protected Characteristics.

#### **Discrimination by perception**

Discrimination by perception can occur when someone discriminates against an individual because they think they possess a particular protected characteristic and this applies even if the person does not actually possess that characteristic. An example of this is if 'B' is selected for redundancy by 'A' because they perceive 'B' to have a progressive condition i.e. they are disabled.

#### **Discrimination arising from disability**

It is unlawful when a disabled person is treated unfavourably because of something connected with their disability and such unfavourable treatment cannot be justified. This type of discrimination only relates to disability.

#### **Harassment**

Harassment is defined as unwanted conduct relating to a protected characteristic that has the purpose or effect of violating a person's dignity, or which creates an intimidating or hostile, degrading, humiliating or offensive environment for that person.

#### **Victimisation**

It is unlawful to treat a person less favourably because he or she has made allegations or brought proceedings under the anti-discrimination legislation, or because they have helped another person to do so. To do so would constitute victimisation.

#### **Bullying**

Bullying is defined as a form of personal harassment involving the misuse of power, influence or position to persistently criticise, humiliate or undermine an individual.