



Preston North End Football Club
Equal Opportunities Monitoring Policy

Preston North End Football Club (this incorporates the Academy and Preston North End Community & Education Trust) and will be referred to throughout the document as 'the Club'.

EQUAL OPPORTUNITIES POLICY

1. POLICY STATEMENT

- 1.1 Preston North End FC is committed to promoting equality of opportunity for all staff and job applicants. We aim to create a working environment in which all individuals are able to make best use of their skills, free from discrimination or harassment, and in which all decisions are based on merit.
- 1.2 We do not discriminate against staff on the basis of age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, religion and belief, sex and sexual orientation collectively known as "**protected characteristics**", under the Equality Act 2010.
- 1.3 The principles of non-discrimination and equality of opportunity also apply to the way in which staff treat visitors, clients, customers, suppliers and former staff members.
- 1.4 All staff have a duty to act in accordance with this policy and treat colleagues with dignity at all times, and not to discriminate against or harass other members of staff, regardless of their status. Harassment is dealt with further in our Anti-harassment and Bullying Policy.
- 1.5 This policy does not form part of any employee's contract of employment and may be amended at any time.

2. WHO IS COVERED BY THE POLICY?

This policy covers all individuals working at Preston North End FC (this incorporates the Academy and Preston North End Community & Education Trust) and will be referred to throughout the document as 'the club'. This includes employees at all levels, including senior managers, directors, employees, apprentices, part-time and fixed-term employees, volunteers and casual workers (collectively referred to as **staff** in this policy).

3. WHO IS RESPONSIBLE FOR THIS POLICY?

- 3.1 The Club Owner's Representative and Executive Director has overall responsibility for the effective operation of this policy and for ensuring compliance with discrimination law. Day-to-day operational responsibility, including regular review of this policy, has been delegated to the Director, People and Culture.

- 3.2 All managers must set an appropriate standard of behaviour, lead by example and ensure that those they manage adhere to this policy and promote our aims and objectives with regard to equal opportunities.
- 3.3 If you are involved in management or recruitment, or if you have any questions about the content or application of this policy, you should contact the Director, People and Culture to request training or further information.

4. SCOPE AND PURPOSE OF THE POLICY

- 4.1 This policy applies to all aspects of our relationship with staff and to relations between staff members at all levels. This includes job advertisements, recruitment and selection, training and development, opportunities for promotion, conditions of service, pay and benefits, conduct at work, disciplinary and grievance procedures, and termination of employment.
- 4.2 We will take appropriate steps to accommodate the requirements of different religions, cultures, and domestic responsibilities.

5. FORMS OF DISCRIMINATION

- 5.1 You must not unlawfully discriminate against or harass other people including current and former employees, job applicants, clients, customers, suppliers and visitors. This applies in the workplace, outside the workplace (when dealing with customers, suppliers or other work-related contacts or when wearing a work uniform), and on work-related trips or events including social events.
- 5.2 Direct discrimination occurs where someone is treated less favourably because of one or more of the protected characteristics set out above. For example, rejecting an applicant on the grounds of their race because they would not "fit in" would be direct discrimination.
- 5.3 Indirect discrimination occurs where someone is disadvantaged by an unjustified provision, criterion or practice that also puts other people with the same protected characteristic at a particular disadvantage. For example, a requirement to work full time puts women at a particular disadvantage because they generally have greater childcare commitments than men. Such a requirement will need to be objectively justified.
- 5.4 Harassment related to any of the protected characteristics is prohibited. Harassment is unwanted conduct that has the purpose

or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. Harassment is dealt with further in our Anti-harassment and Bullying Policy.

- 5.5 Victimisation is also prohibited. This is less favourable treatment of someone who has complained or given information about discrimination or harassment, or supported someone else's complaint.

6. RECRUITMENT AND SELECTION

- 6.1 We aim to ensure that no job applicant suffers discrimination because of any of the protected characteristics above. Our recruitment procedures are reviewed regularly to ensure that individuals are treated on the basis of their relevant merits and abilities. Job selection criteria are regularly reviewed to ensure that they are relevant to the job and are not disproportionate. Shortlisting of applicants should be done by more than one person wherever possible.
- 6.2 Job advertisements should avoid stereotyping or using wording that may discourage groups with a particular protected characteristic from applying.
- 6.3 Where appropriate, the Director, People and Culture may approve the use of lawful exemptions to recruit someone with a particular protected characteristic - for example, where positive action to recruit a person from one of the protected characteristics. The advertisement should specify the exemption that applies.
- 6.4 Applicants should not be asked about their health or disability before a job offer is made. There are limited exceptions which should only be used with the approval of the Director, People and Culture. For example:
 - 6.4.1 Questions necessary to establish if an applicant can perform an intrinsic part of the job (subject to any reasonable adjustments).
 - 6.4.2 Questions to establish if an applicant is fit to attend an assessment or any reasonable adjustments that may be needed at interview or assessment.
 - 6.4.3 Positive action to recruit disabled persons.
 - 6.4.4 Equal opportunities monitoring (which will not form part of the decision-making process).

- 6.4.5 Except for Professional Footballers whom will be required to complete a full medical, carried out by a professional and in agreement with both Clubs before a contract will be offered.
- 6.5 Applicants should not be asked about past or current pregnancy or future intentions related to pregnancy. Applicants should not be asked about matters concerning age, race, religion or belief, sexual orientation, or gender reassignment without the approval of the Director, People and Culture who should first consider whether such matters are relevant and may lawfully be taken into account.
- 6.6 We are required by law to ensure that all employees are entitled to work in the UK. Assumptions about immigration status should not be made based on appearance or apparent nationality. All prospective employees, regardless of nationality, must be able to produce original documents (such as a passport) before employment starts, to satisfy current immigration legislation. The list of acceptable documents is available from the Director, People and Culture or the UK Border Agency.
- 6.7 To ensure that this policy is operating effectively, and to identify groups that may be underrepresented or disadvantaged in our organisation, we monitor applicants' ethnic group, gender, disability, sexual orientation, religion and age as part of the recruitment procedure. Provision of this information is voluntary and it will not adversely affect an individual's chances of recruitment or any other decision related to their employment.
- 6.8 Equality data is removed from applications prior to the shortlisting process; Marital Status, Ethnicity, Religion/Belief, Sexual Orientation, Gender, Nationality, Disability and Transgender status. Equality data is available upon request from the English Football League (EFL), this is anonymised for the purposes stated in this policy. Analysing this data helps us take appropriate steps to avoid discrimination and improve equality and diversity.

7. STAFF TRAINING AND PROMOTION AND CONDITIONS OF SERVICE

- 7.1 Staff training needs will be identified through regular staff appraisals. All staff will be given appropriate access to training to enable them to progress within the organisation and all promotion decisions will be made on the basis of merit.
- 7.2 Workforce composition and promotions will be regularly monitored to ensure equality of opportunity at all levels of the organisation. Where appropriate, steps will be taken to identify and remove unjustified barriers and to meet the special needs of disadvantaged or underrepresented groups.

- 7.3 Our conditions of service, benefits and facilities are 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.

8. STAFF APPRAISALS (Performance Reviews)

The Club will operate a policy of regular performance reviews (no later than every 12 months) which will be implemented at the beginning of 2024, under which employees and their immediate manager jointly discuss progress in the job, set targets and identify priorities and training needs for the future. A copy of your performance review will stay on your personnel file and you will be provided with a copy.

9. INTERNAL OPPORTUNITIES

The Club aims to provide opportunities for internal promotion and transfers where ever possible. Vacancies will be advertised internally via notice boards when they become available. Employees who are interested in a particular vacancy will be required to firstly notify their immediate line manager, and to comply with the application requirements stated in the vacancy bulletin.

10. TERMINATION OF EMPLOYMENT

- 10.1 We will ensure that redundancy criteria and procedures are fair and objective and are not directly or indirectly discriminatory.
- 10.2 We will also ensure that disciplinary procedures and penalties are applied without discrimination, whether they result in disciplinary warnings, dismissal or other disciplinary action.

11. DISABILITY DISCRIMINATION

- 11.1 If you are disabled or become disabled, we encourage you to tell us about your condition so that we can support you as appropriate.
- 11.2 If you experience difficulties at work because of your disability, you may wish to contact your line manager or the Director, People and Culture to discuss any reasonable adjustments that would help overcome or minimise the difficulty. Your line manager or the Director, People and Culture may wish to consult with you and your medical advisor(s) about possible adjustments. We will consider the matter carefully and try to accommodate your needs within reason. If we consider a particular adjustment would not be reasonable we will explain our reasons and try to find an alternative solution where possible.

- 11.3 We will monitor the physical features of our premises to consider whether they place disabled workers, job applicants or service users at a substantial disadvantage compared to other staff. Where reasonable, we will take steps to improve access for disabled staff and service users.

12. FIXED-TERM EMPLOYEES

- 12.1 We monitor our use of fixed-term employees, and their conditions of service, to ensure that they are being offered appropriate access to benefits, training, promotion and permanent employment opportunities. We will, where relevant, monitor their progress to ensure that they are accessing permanent vacancies.

13. PART-TIME WORK

- 13.1 We monitor the conditions of service of part-time employees and their progression to ensure that they are being offered appropriate access to benefits and training and promotion opportunities. Arrangements for flexible working will be reviewed on a case by case basis. The Owner's Representative and Executive Director will consider the impact to the business and will make the final decision.

14. BREACHES OF THIS POLICY

- 14.1 If you believe that you may have been discriminated against you are encouraged to raise the matter through our Grievance Procedure. If you believe that you may have been subject to harassment you are encouraged to raise the matter through our Anti-Harassment Policy. If you are uncertain which applies or need advice on how to proceed you should speak to the Director, People and Culture.
- 14.2 Allegations regarding potential breaches of this policy will be treated in confidence and investigated in accordance with the relevant procedure. Staff who make such allegations in good faith will not be victimised or treated less favourably as a result. False allegations which are found to have been made in bad faith will, however, be dealt with under our Disciplinary Procedure.
- 14.3 Any member of staff who is found to have committed an act of discrimination or harassment will be subject to disciplinary action. Such behaviour may constitute gross misconduct and, as such, may result in summary dismissal. We take a strict approach to serious breaches of this policy.

15. MONITORING AND REVIEW OF THE POLICY

- 15.1 This policy is reviewed annually by the Director, People and Culture. Recommendations for change should be reported to the Director, People and Culture.

- 15.2 We will continue to review the effectiveness of this policy to ensure it is achieving its objectives. As part of this process we monitor the composition of job applicants and the benefits and career progression of our staff.
- 15.3 Staff are invited to comment on this policy and suggest ways in which it might be improved by contacting the Director, People and Culture.

Effective date	October 2022
Approved by	Peter Ridsdale, Owner's Representative and Executive Director
Approved by	Tom Drake, Chief Executive Officer, Preston North End Community and Education Trust
Reviewed date	October 2023
Next Review date	October 2025