

Charlton Athletic Football Club:

Equality, Diversity and Inclusion (EDI) Policy

1.0 Statement of Intent

Charlton Athletic Football Club (CAFC) are committed to promoting and embedding a culture of Equality, Diversity & Inclusion (EDI) within the core fabric and culture of the Club. We are aware that embracing and fostering EDI promotes a positive Club culture that values all staff and Fans, as well as strong corporate and social responsibility.

CAFC values and celebrates the diversity of its workforce. It is essential that all staff, players and directors are aware of the value of creating a safe and inclusive work environment where everyone is given the opportunity to realise their full potential. We are committed to promoting equality and valuing diversity, and this is central to our commitment to excellence in all that we do.

CAFC operates a policy of zero tolerance towards all forms of discrimination and anti-social behaviour. There is no place for any forms of discrimination within The Valley, or associated sites, and the Club are dedicated to achieving inclusion for all.

We will continue to work to ensure that EDI remains a core component of the Clubs organisational structure and operational practices.

2.0 Context

We recognise that positively embracing EDI helps to improve fan engagement as well as staff morale, worker retention and job satisfaction, and that it is vital to create an inclusive environment where everyone feels able to participate, contribute and to achieve their potential. Charlton Athletic also recognise that effective EDI goes beyond legal compliance and seeks to add significant value to the Club. This helps to contribute to employee well-being and fan engagement.

The Club will treat everyone with respect and dignity, and seek to provide a positive working and fan environment, free from unlawful discrimination, harassment, victimisation and abuse. The Club will also continue to work in partnership with the Charlton Athletic Community Trust (CACT), to further our EDI objectives.

We believe that having a clear policy on equality for staff, as well as meeting our statutory requirements, under the Equality Act 2010, will further demonstrate this commitment, and be consistent with values and behaviours that all members of the Club should exhibit.

The Club are committed to the standards and values of the EFL Code of Practice relating to equality and anti-discrimination, and to tackling discrimination, particularly in relation to groups with 'Protected Characteristics'; as defined under the Equality Act 2010:

- Age
- Disability
- Gender Reassignment
- Marriage and Civil Partnership
- Pregnancy and Maternity
- Race
- Religion or Belief
- Sex
- Sexual Orientation

3.0 Purpose:

The overall purpose of this policy is to assist CAFC in putting their commitment to EDI and fair treatment in the workplace into practice. The policy is applicable to all employees and outlines the responsibilities of all staff in relation to equal opportunities, unlawful discrimination and harassment. A summary of areas covered by this policy is detailed below. Should you have any questions in relation to this document please speak to your Line Manager:

- General Principles of the Policy
- Legislation
- Right to Report Harassment/Bullying
- Types of Discrimination
- Equality of Opportunity
- Customers, Suppliers and Others
- Training
- Grievances Responsibilities

4.0 General Principles and Approach

It is CAFC's approach that all employees have a working environment that promotes dignity and respect and where individual differences, and the contributions made are recognised and valued.

The aim of the CAFC EDI Policy is to promote Charlton Athletic's ongoing commitment to EDI objectives, to help to ensure that everyone is treated fairly, with dignity and respect, and to embed EDI as a core component within the Charlton Athletic Football Club DNA. As part of this commitment, Charlton Athletic have appointed a Head of EDI.

CAFC's approach is as follows:

- CAFC values the differences that a diverse workforce brings
- CAFC will not tolerate or engage in any practices that may be found to be treating employees, customers, visitors of Fans unfairly
- CAFC will deal with discrimination or actions that affect equality in a robust manner viewing such issues as gross misconduct where appropriate
- CAFC is committed to providing equal opportunities in employment and will work towards the elimination of unlawful and unfair discrimination

5.0 Legislation

It is unlawful to discriminate directly or indirectly in recruitment or employment because of age, disability, sex, gender reassignment, pregnancy, maternity, race (which includes colour, nationality and ethnic or national origins), sexual orientation, religion or belief, or because someone is married or in a civil partnership - these are known as "Protected Characteristics".

Discrimination after employment may also be unlawful, e.g. refusing to give a reference for a reason related to one of the protected characteristics. Legislation also exists to prevent less favourable treatment of workers such as staff on fixed term contracts or those employed as Agency Workers within CAFC.

Employees should not discriminate against or harass a member of the public in the provision of services or goods. It is unlawful to fail to make reasonable adjustments to overcome barriers to using services caused by disability.

6.0 Right to Report Harassment/Bullying

Employees have a right to complain if they are treated in a manner that they believe constitutes harassment or bullying. This will include behaviour that has causes offence, intimidation, humiliation, embarrassment or distress.

Apart from complaints about the behaviour of colleagues, employees have the right to complain if they believe that they have been bullied or harassed by a third party, for example a customer, client or supplier. Employees who raise a genuine complaint under this policy will under no circumstances be subjected to any unfavourable treatment or victimisation as a result of making a complaint.

Examples of harassment or bullying would include:

- Sarcastic personal remarks about colleagues
- Sexual, ageist, racial or disability related 'banter'
- The display of material with sexual or racial overtones (even if not directed at the complainant) or which is derogatory about any type of unlawful discrimination
- Unwelcome touching
- Jostling, shoving or other forms of unwanted contact and/or intimidating or threatening postures
- Practical jokes, horseplay, personal insults and name calling, public or private humiliation
Interference with personal property and/or equipment
- Freezing out or excluding, intimidation and threats in general

However, it is established that an employee has made a deliberately false or malicious complaint against another person about harassment or bullying, disciplinary action will be taken against that employee.

Any employee who witnesses an incident that they believe to be the harassment or bullying of another member of staff should report the incident in confidence to their Line Manager or another member of the management team. The Company will take all such reports seriously and will treat the information in strict confidence as far as it is possible to do so.

7. Types of Discrimination

The following are brief explanations of types of discrimination:

Direct Discrimination

This is where a person is treated less favourably than another because of one or more of the protected characteristics. An example of direct discrimination would be refusing to employ a woman because she is pregnant.

In limited circumstances, employers can directly discriminate against an individual for a reason related to any of the protected characteristics where there is a genuine occupational requirement.

Indirect Discrimination

This is where a policy, practice or arrangement is applied in the same way for everybody, but disadvantages a group of people who share a Protected Characteristic, and they are disadvantaged as part of this group.

Harassment

This is where there is unwanted behaviour, related to one of the protected characteristics that has the purpose or effect of violating a person's dignity; or creating an intimidating, hostile, degrading, humiliating or offensive environment. It does not matter whether or not this effect was intended by the person responsible for the conduct. Pregnancy and Maternity is not protected directly under the harassment provisions, however, unwanted behaviour may amount to harassment related to Sex. The word 'unwanted' means 'unwelcome' or 'uninvited'.

Discrimination by Association

This is where an individual is directly discriminated against or harassed for association with another individual who has a protected characteristic

Discrimination by Perception

This is where an individual is directly discriminated against or harassed based on a perception that they have a particular protected characteristic when they do not, in fact, have that protected characteristic.

Victimisation

This occurs where an employee is subjected to a detriment, such as being denied a training opportunity or a promotion, because they made or supported a complaint or raised a grievance under the Equality Act 2010, or because they are suspected of doing so. However, an employee is not protected from victimisation if he/she acted maliciously or made or supported an untrue complaint.

Failure to Make Reasonable Adjustments

This is where:

- A policy or practice puts a disabled person at a substantial disadvantage in comparison with individuals who are not disabled, for example corresponding only by email and phone with a person who is deaf instead of face to face
- A physical feature puts a disabled person at a substantial disadvantage in comparison with individuals who are not disabled, for example a design or building feature or equipment in the premises, such as only having stairs and no lifts

The potential discrimination occurs when the employer has failed to make reasonable adjustments to enable the disabled person to overcome the disadvantage.

8. Equality of Opportunity

The Company will avoid unlawful discrimination and unjustified less favourable treatment in all aspects of employment including recruitment, promotion, opportunities for training, pay and benefits, discipline and selection for redundancy.

Person and job specifications will be limited to those requirements that are necessary for the effective performance of the job. Candidates for employment or promotion will be assessed objectively against the requirements for the job, taking account of any reasonable adjustments that may be required for candidates with a disability. Disability and personal or home commitments will not form the basis of employment decisions, except where necessary.

CAFC will consider any possible indirect discriminatory effect of its standard working practices, including the number of hours to be worked, the times at which these are to be worked and the place at which work is to be done, when considering requests for variations to these standard working practices and will refuse such requests only if CAFC considers it has good reasons, unrelated to any protected characteristic, for doing so. CAFC will comply with its obligations in relation to statutory requests for contract variations. CAFC will also make reasonable adjustments to its standard working practices to overcome barriers caused by disability.

CAFC will monitor the Protected Characteristic composition of the existing workforce and of applicants for jobs (including promotion). Where monitoring takes place, it will consider and take

any appropriate action to address any problems that may be identified as a result of the monitoring process.

CAFC cannot lawfully discriminate in the selection of employees for recruitment or promotion, but CAFC may use appropriate lawful methods, including lawful positive action, to address the under-representation of any group that CAFC identifies as being underrepresented in particular types of job.

9. Customers, Suppliers and Other People Not Employed by the CAFC

CAFC will not discriminate unlawfully against customers using or seeking to use goods, facilities or services provided by CAFC. Employees should report any bullying or harassment by customers, suppliers, visitors or others to their Manager who will take appropriate action. Agency workers will not be treated less favourably in regard to pay and rights than permanent employees following completion of any qualifying criteria specified from time to time by the government.

10. EDI Training for Staff

CAFC recognise that embracing and embedding a culture of EDI within fabric of the Club promotes a positive culture that values all staff and Fans, as well as strong corporate and social responsibility.

CAFC are committed to ensuring that everyone is made welcome to The Valley and all other Club sites and premises, and are treated with dignity and respect, including: Fans; Players; Official,, Staff; Customers; community groups and voluntary organisations; and, all other stakeholders .

We also recognise that effective EDI goes beyond legal compliance and seeks to add significant value to the Club, as well as our responsibility to provide guidance and training on EDI to both players and staff – CAFC will therefore provide EDI training to all Staff and the CAFC Board.

11. Staff EDI Network

A CAFC Staff EDI Network will be established, and responsible for:

- Providing informal peer support on relevant issues
- Helping to raise awareness about relevant EDI issues
- Contributing to the ongoing review and development of CAFC EDI activities

12. Grievances

If an employee considers they may have been unlawfully discriminated against or if they feel they have been subject to harassment of any kind, they may use the Grievance Procedure to make a complaint.

However, before raising a formal complaint, employees are encouraged in the first instance to talk directly and informally to the person whom they believe is harassing them/causing offence and explain clearly what aspect of the person's behaviour is unacceptable and request that it stop. It may be that the person whose conduct is causing offence is genuinely unaware that their behaviour is unwelcome or objectionable and that a direct approach can resolve the matter without the need for formal action. Where an employee would like support to make such an approach, they should contact a Manager.

If, however, an employee feels unable to take this course of action, or if they have already approached the person to no avail, or if the harassment is of a very serious nature, they may elect to raise a formal complaint. Formal complaints may be raised with either the employee's Line Manager.

CAFC will take any complaint seriously and will seek to resolve any grievance which it upholds. Staff will not be penalised for raising a grievance, even if the grievance is not upheld, unless the complaint is both untrue and made in bad faith.

13. Roles and Responsibilities

Employees

Every employee is required to assist the CAFC to meet its commitment to provide equal opportunities in employment and avoid unlawful discrimination. Employees can be held personally liable as well as, or instead of, CAFC for any act of unlawful discrimination. Employees who commit serious acts of harassment may be guilty of a criminal offence.

All staff are responsible for ensuring that they understand and apply this Policy throughout their day to day activities and interactions

Acts of discrimination, harassment, bullying or victimisation against employees or customers are disciplinary offences and will be dealt with under the disciplinary procedure. Discrimination, harassment, bullying or victimisation may constitute gross misconduct and could lead to dismissal without notice.

Managers

Managers who receive a complaint have a duty to investigate the matter thoroughly and objectively and to take corrective action in order to ensure that the Company's policy is complied with. Line Managers should be responsive and supportive towards any worker who raises a genuine complaint of discrimination, harassment or bullying.

CAFC reserves the right, at its discretion, to suspend any employee who is under investigation for alleged acts of discrimination, harassment or bullying for a temporary period whilst investigations are being carried out. Such suspension will be for as short a time as possible and will be on full pay.

Any employee accused of such offences will be informed of the exact nature of the complaint against them and afforded a full opportunity to challenge the allegations and put forward an explanation for their behaviour in a confidential interview, with a companion present if they wish. No employee will be presumed guilty following such an allegation. CAFC will maintain records of investigations into alleged incidents of this nature, the outcome of the investigations and any corrective or disciplinary action taken. These records will be maintained in confidence and in line with the provisions of the General Data Protection Regulations.

Further Information

CAFC will review policies and procedures periodically to reflect changes in legislation, good practice etc.

Policy Review: September 2023

Policy Approved: September 2023

Review Date: September 2024 (or sooner if changes to legislation or guidance)

Signed: 

Name: James Rodwell

Position: Managing Director

Date: 27/09/23