



EQUAL OPPORTUNITIES POLICY and PROTOCOL

Commitment to Equal Opportunities

Barrow AFC is committed to the principle of equal opportunities in employment and in equal pay for work of the same or similar nature or work of equal value. The Company is opposed to any form of less favourable treatment or financial rewards, whether through direct or indirect discrimination, harassment, victimisation or segregation accorded to Employees or job applicants, on the grounds of their race, religious beliefs, political opinions, creed, colour, ethnic origin, nationality, marital parental status, sex, sexual orientation, age or physical or mental disabilities.

The Company recognises its obligations under anti-discrimination legislation including the Equality Act 2010, the Equal Pay Act and the spirit and intent of the Codes of Practice published by the Equal Opportunities Commission (EOC) and Commission for Racial Equality (CRE) and European Commission.

Employment Practices

The Company will actively promote equal opportunities throughout the organisation through the application of employment policies which will ensure that individuals receive treatment that is fair and equitable and consistent with their relevant aptitudes, potential, skills and abilities. All Managers and Supervisors will seek to ensure that all Employees comply with these principles.

The Company will ensure that individuals are recruited and selected, promoted and trained on objective criteria having regard to the relevant aptitudes, potential, skills and abilities. In particular, no applicant will be placed at a disadvantage by requirements or conditions which are not necessary to the performance of the job, or which constitute indirect unfair discrimination.

The Company recognises the problems that sexual, racial and other forms of harassment may cause at work and is committed to ensure that such unacceptable behaviour does not take place. All forms of harassment are unacceptable and will not be tolerated by the Company.

Harassment on the grounds of sex, race, disability, age, sexual orientation or any other protected characteristic is regarded as unlawful discrimination. All forms of harassment are regarded as contrary to Company Policy and all such cases will be dealt with under the harassment and/or Disciplinary Procedure.



Harassment. Grievance and Disciplinary Procedure

The Company operates an anti-harassment policy and any Employee who feels that they have been subjected to harassment or discrimination of any sort should raise the issue in accordance with the anti-harassment policy. The Company will make every effort to secure a satisfactory resolution of any such issue. In addition, the Company will ensure that any Employee making a complaint of unfair discrimination will be protected from any victimisation in any form.

The Company will continue to treat unfair discriminatory conduct by any member of staff as a disciplinary offence.

Rehabilitation of Offenders

It is the Company's Policy not to discriminate against anyone who has had a 'spent' conviction under the Rehabilitation of Offenders Act 1974. Under that Act it is unlawful to refuse to engage or to dismiss on the grounds of a spent conviction.

The Act only applies to terms of imprisonment of 30 months or less and certain fines and other charges. In addition, certain criminal offences and offences in contravention of the Companies Acts and Insider Trading Regulations, under the Financial Services Act, are also excluded from the Act.

References given by the Company or obtained on new recruits must not refer to spent convictions and should be ignored if disclosed in error. The Data Protection Act makes it obligatory that all references to 'spent' convictions in any computerised records be wiped off. It is the Company's policy that this applies to manual records also.

Disability

The Equality Act makes it unlawful to refuse to recruit, to refuse employment benefits or opportunities or to dismiss because a person is physically or mentally disabled (as defined in the Act). We will make every effort to make reasonable adjustments to the workplace and to working arrangements where the current conditions are disadvantageous to disabled people.

EQUALITY PROTOCOL

Barrow AFC is committed to encouraging equality, diversity and inclusion among our workforce within the Club, Community Trust and Academy setting, thus eliminating unlawful discrimination.

The aim is for our workforce to be truly representative of all sections of society, and for each employee to feel respected and able to give their best.

Barrow AFC - in providing goods and/or services and/or facilities - is also committed against unlawful discrimination of fans or the wider public.



The protocols' purpose is to:

- provide equality, fairness and respect for all in our employment, whether voluntary, temporary, part-time or full-time
- not unlawfully discriminate because of the Equality Act 2010 protected characteristics of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality, and ethnic or national origin), religion or belief, sex and sexual orientation
- oppose, and avoid all forms of unlawful discrimination. This includes in pay and benefits, terms and conditions of employment, dealing with grievances and discipline, dismissal, redundancy, leave for parents, requests for flexible working, and selection for employment, promotion, training or other developmental opportunities

The organisation commits to:

- Encouraging equality, diversity and inclusion in the workplace as they are good practice and make business sense.
- Create a working environment free of bullying, harassment, victimisation and unlawful discrimination, promoting dignity and respect for all, and where individual differences and the contributions of all staff are recognised and valued.

This commitment includes training managers and all other employees about their rights and responsibilities under the equality, diversity and inclusion policy. Responsibilities include staff conducting themselves to help the organisation provide equal opportunities in employment, and prevent bullying, harassment, victimisation and unlawful discrimination.

All staff should understand they, as well as their employer, can be held liable for acts of bullying, harassment, victimisation and unlawful discrimination, in the course of their employment, against fellow employees, customers, suppliers and the public

- Take seriously complaints of bullying, harassment, victimisation and unlawful discrimination by fellow employees, fans, suppliers, visitors, the public and any others in the course of the organisation's work activities.

Such acts will be dealt with as misconduct under the club's grievance and/or disciplinary procedures, and appropriate action will be taken. Particularly serious complaints could amount to gross misconduct and lead to dismissal without notice.

Further, sexual harassment may amount to both an employment rights matter and a



criminal matter, such as in sexual assault allegations. In addition, harassment under the Protection from Harassment Act 1997 – which is not limited to circumstances where harassment relates to a protected characteristic – is a criminal offence.

- Make opportunities for training, development and progress available to all staff, who will be helped and encouraged to develop their full potential, so their talents and resources can be fully utilised to maximise the efficiency of the organisation.
- Decisions concerning staff being based on merit (apart from in any necessary and limited exemptions and exceptions allowed under the Equality Act).
- Review employment practices and procedures when necessary to ensure fairness, and also update them and the policy to take account of changes in the law.
- Monitor the make-up of the workforce regarding information such as age, sex, ethnic background, sexual orientation, religion or belief, and disability in encouraging equality, diversity and inclusion, and in meeting the aims and commitments set out in the equality, diversity and inclusion policy. Monitoring will also include assessing how the equality, diversity and inclusion policy, and any supporting action plan, are working in practice, reviewing them annually, and considering and taking action to address any issues.

The equality, diversity and inclusion protocol are fully supported by senior management and details of the club's grievance and disciplinary policies and procedures can be found at **barrowafc.com**. This includes with whom an employee should raise a grievance – usually their line manager.

Use of the club's grievance and/or disciplinary procedures does not affect an employee's right to make a claim to an employment tribunal within three months of the alleged discrimination.

EQUALITY STATEMENT

Barrow AFC will not tolerate any form of discrimination as identified in the Equality Act 2010 under the 9 protected characteristic, listed: age, race, sex, religion, sexual orientation, disability, gender reassignment, marriage and civil partnership, maternity and paternity leave. Furthermore, behaviour which is deemed as bullying or harassment will also not be tolerated and will be dealt with in the same view as discrimination.

Barrow AFC is dedicated to ensuring a safe and inclusive environment for everybody to thrive and the best version of themselves.

If you feel you have personally encountered discrimination, or believe to have witnessed discriminatory behaviour, please contact our General Manager Alisha Henry on



a.henry@barrowafc.com to make a formal complaint. Where all complaints are bona fide (club name) will follow the process below.

Acknowledgement of receipt – Acknowledgement of receipt within 48 hours by e-mail reply

3 weeks to investigate- This will involve investigation with relevant authorities, complainant and all other parties as necessary

Contact with finding & resolution- A letter sent by e-mail on behalf of Barrow AFC, outlining action taken (if required) and next steps

For more information around current sanctions for individuals found guilty of discrimination, harassment or bullying, please email a.henry@barrowafc.com

As part of our ongoing commitment to Equality, Diversity and Inclusion, we would like to share our current objectives for season 20-21

* Ensure all staff have completed the required EDI training in line with the EFL Equality Code of Practice

* Meet the audited standards required as laid down in the EFL Code of Practice throughout Barrow AFC

*Set up the All Bluebirds group to support and embed a culture of equality, diversity and inclusion in the Barrow AFC family

*Promote and organise national, local and club related events to support EDI and raise awareness

All employees are encouraged to:

- understand this protocol and seek clarification from management where required
- consider this protocol while completing work-related duties and at any time while representing **Barrow AFC**
- support fellow workers in their awareness of this policy
- support and contribute to **Barrow AFC's** aim of providing a mentally healthy and supportive environment for all workers.
- employees are notified of all changes to this policy.

Monitoring and Review

Barrow AFC will review this policy and protocol **six** months after implementation and annually thereafter.

Effectiveness of the protocol will be assessed through:

- feedback from workers, the All Bluebirds Committee, and management
- review of the protocol by management and committee to determine if objectives have been met and to identify barriers and enablers to ongoing policy implementation.