



## **EQUAL OPPORTUNITIES POLICY**

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### **1.0 INTRODUCTION**

Middlesbrough Football Club (“Club”) is committed to promoting equal opportunities in employment and the avoidance of discrimination in work by treating people fairly and with respect; by recognising inequalities exist; by taking steps to address them; and by providing access and opportunities for all members of the community.

This Policy applies to all aspects of employment with us, including recruitment, pay and conditions, training, appraisals, promotion, conduct at work, disciplinary and grievance procedures, and termination of employment. The Board has overall responsibility for the effective operation of this Policy. All Department Managers must set an appropriate standard of behaviour, lead by example and ensure that those they manage adhere to the policy and promote Club aims and objectives with regard to equal opportunities. Department Managers will be given appropriate training on equal opportunities awareness and equal opportunities recruitment and selection best practice.

The aim of this Policy is to ensure that no employee, worker (including agency workers, contractors, interns and volunteers), job applicant or prospective employee is discriminated against either directly or indirectly on the grounds of age, sex, sexual orientation, gender reassignment, disability, marriage/civil partnership, pregnancy and maternity, race, religion/belief.

This Policy will be circulated to any agencies responsible for the Club’s recruitment and a copy of the policy will be made available for all workers and made known to all applicants for employment.

The policy will be implemented in accordance with the Equality Act 2010 and full account will be taken of all available guidance and in particular any relevant Codes of Practice.

### **2.0 RECRUITMENT AND SELECTION**

We will endeavour, through appropriate training, to ensure that employees making recruitment, selection and promotion decisions will not discriminate, whether consciously or unconsciously, in making these decisions. Promotion and advancement will be made on merit, and all decisions relating to this will be made within the overall principles of this policy.

Job descriptions and role profiles, where used, will be in line with the equal opportunities policy and job requirements will be reflected accurately in any person specifications.

We will adopt a consistent, non-discriminatory approach to the advertising of vacancies and will not confine our recruitment to areas or media sources which provide only, or mainly, applicants of a particular group.

All employees involved in the recruitment process will periodically review their selection criteria to ensure that they are related to the job requirements and do not unlawfully discriminate.

Personal details and any reference to protected characteristics will be removed from application forms before they are given to the recruiting manager for screening. Short listing and interviewing will be carried out by more than one person.

Job applicants should not be asked questions which might suggest an intention to discriminate on grounds of a Protected Characteristic. For example, applicants should not be asked whether they are pregnant or planning to have children.

Job applicants should not be asked about health or disability before a job offer is made. There are limited exceptions which should only be used with the approval of the Human Resources Department. For example:

(a) Questions necessary to establish if an applicant can perform an intrinsic part of the job (subject to any reasonable adjustments).

(b) Questions to establish if an applicant is fit to attend an assessment or any reasonable adjustments that may be needed at interview or assessment.

(c) Equal opportunities monitoring (which will not form part of the selection or decision-making process).

Where necessary, job offers can be made conditional on a satisfactory medical check.

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 HR Department or UK Visas and Immigration.

We will not disqualify any applicant because they are unable to complete an application form unassisted unless personal completion of the form is a valid test of the standard of English required for the safe and effective performance of the job.

All positions dealing with children in regulated activity will be subject to a DBS Enhanced Disclosure.

Selection decisions will be not be influenced by any perceived prejudices.

### **3.0 TRAINING AND PROMOTION**

Any employees involved in the recruitment and selection of new staff or the promotion of existing staff will receive equality and diversity training and unconscious bias training to ensure a fair and inclusive process. Department Managers will be trained in the application of this policy to ensure they are aware of its contents and provisions.

Training needs will be identified through appraisals. Employees will be given appropriate access to training to enable them to progress within the Club and all promotion decisions will be made on the basis of merit.

### **4.0 EQUALITY MONITORING**

We will maintain and review equality data and employee recruitment records in order to monitor the progress of this policy and to identify groups that may be underrepresented or disadvantaged within

the Club. 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. The information is removed from applications before shortlisting, and kept in an anonymised format solely for the purposes stated in this Policy. Analysing this data helps us take appropriate steps to avoid discrimination and improve equality and diversity.

Monitoring may involve the following:

- (a) An anonymous annual survey to help us identify the profile of our employees and address any areas of under representation.
- (b) Collecting equality data from job applicants to assist us in monitoring who is applying for employment with us for the purpose of assessing the effectiveness of this policy and encouraging a greater diversity profile.
- (c) Reviewing recruitment and selection administration, the decisions reached and the reasons for those decisions.

The results of any monitoring procedures will be reviewed at regular intervals to assess the effectiveness of the implementation of this policy. Consideration will be given, if necessary, to adjusting this policy to afford greater equality of opportunities to all workers, job applicants and prospective employees.

## **5.0 DISABILITIES**

If you are disabled or become disabled, we encourage you to tell us about your condition so that we can support you as appropriate.

If you experience difficulties at work because of your disability, you may wish to contact Department Manager or the HR Department to discuss any reasonable adjustments that would help overcome or minimise the difficulty. Your Department Manager or the HR Department may wish to consult with you and your medical adviser 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.

## **6.0 DISCRIMINATION**

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.

Discrimination means treating a person unfairly because of who they are or because they possess certain characteristics. Discrimination can occur in the following forms:

**Direct Discrimination** - when a person with a protected characteristic is treated less favourably than others

**Indirect Discrimination** - a rule or policy in the workplace which puts someone at a disadvantage as compared to others

**Discrimination by Association** – when a person is treated unfairly because someone they know or are associated with has a protected characteristic

**Discrimination by Perception** - when a person receives unfair treatment because someone thinks they belong to a group with protected characteristics

**Harassment** - comprises of unwanted behaviour that makes another person feel offended, humiliated or intimidated

**Victimisation** - when a person is treated badly or subjected to detriment because they complained about discrimination or supported another victim of discrimination

## **7.0 INCIDENT REPORTING**

Where a worker has reason to complain about discriminatory treatment or behaviour, they should report this to their Department Manager or to Kathryn Hancock, Head of HR (01642 757692) who will respond in accordance with the Club's Grievance procedure. Complaints about bullying and harassment, should be reported in accordance with the Club's Anti Bullying and Harassment policy.

Alternatively, contact can also be made with Kick it Out, English Football's Equality and Inclusion organisation, at [www.kickitout.org](http://www.kickitout.org) (Tel 020 7253 0162).

There must be no victimisation or retaliation against employees who complain about discrimination. However, making a false allegation deliberately and in bad faith will be treated as misconduct and dealt with under our Disciplinary Procedure. We take a strict approach to breaches of this Policy, which will be dealt with in accordance with our Disciplinary Procedure. Serious cases of deliberate discrimination may amount to gross misconduct resulting in dismissal.

This policy does not form part of the employee's contract of employment and we may amend it at any time.