

EQUALITY POLICY Wolverhampton Wanderers Football Club

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EQUALITY POLICY

Executive Chairman's Statement

As a Premier League football club, Wolves is driven by progression and the values of determination, humility and togetherness, along with the belief that these values can empower people to lead better lives.

We are very proud that Wolverhampton is a diverse, vibrant and multi-cultural community, and we believe that by embracing that diversity and making a commitment to increasing representation across all groups who interact with the club, we will improve our business performance, while ultimately providing greater opportunity for all.

The aim of the Equality Policy is to promote our own equality objectives and in doing so, help to ensure that everyone is treated fairly and with respect. This policy and the requirements of the Equality Act 2010 applies to Wolverhampton Wanderers Football club ("the club") job applicants, employees, workers, community participants, players, fans and club partners.

The club's commitment is to promote inclusion and to confront and eliminate discrimination whether by reason of age, gender, gender reassignment, sexual orientation, marital status or civil partnership, race, nationality, ethnic origin, religion or belief, ability or disability, pregnancy and maternity and to encourage equal opportunities. These are known as 'protected characteristics' under the Equality Act 2010.

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Jeff Shi, Executive Chairman

May 2019

Implementation

This policy is fully supported by the Board of Wolverhampton Wanderers Football Club and a copy of this policy will be published on the club website. The Board will review the policy at intervals of no more than three years, (or when necessary due to changes in legislation) in line with the policy review process.

The Executive Chairman is responsible for the day-to-day implementation of this policy.

The 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.

The club will provide access to a rolling programme of training (for example, online, face-to-face, briefings) for all of its players, match-day fans, staff, Board members, participants in outreach programmes and other people engaged with the club's activities to raise awareness of both collective and individual responsibilities.

It will be a condition of working with Wolverhampton Wanderers Football Club that suppliers:

- Commit to act in accordance with this policy; and
- Support such measures and initiatives that [Club Name] may institute or take part in to advance the aims of this policy.

Positive Action and Training

The club is committed to equality inclusion and anti-discrimination. The club commits to a programme of raising awareness and educating, investigating concerns and applying relevant and proportionate sanctions, campaigning, widening diversity and representation and promoting diverse role models, which we believe are all key actions to promote inclusion and eradicate discrimination within football.

APPENDIX

Relevant Legislation

Discrimination has been legally defined through a series of legislative acts, culminating in the current Equality Act 2010 which came into force in October 2010.

Discrimination refers to less favourable treatment on the grounds of a '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 (which includes ethnic or national origin, colour or nationality), 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 with someone who is assumed to have it.

Forms of Discrimination and Discriminatory Behaviour

Direct discrimination

Direct discrimination is defined as less favourable treatment on the grounds of one or more 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, and any such indirectly discriminatory affect cannot be justified as a proportionate means of achieving a legitimate aim.

Discrimination arising from disability

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

Reasonable Adjustments

When a provision, criterion, practice, or physical feature of our premises places a disabled person at a substantial disadvantage when compared to a non-disabled person, the club will undertake adjustments, so far as a reasonable to avoid or reduce that disadvantage.

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.

Complaints and compliance

Wolverhampton Wanderers Football Club considers all 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 bona fide 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 outreach programmes and other people engaged with the club's activities who violate the Wolverhampton Wanderers 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 in outreach programmes and other people engaged with the club's activities should, in the first instance, complain to that person. If this does not resolve the matter, or in the case of allegations of discriminatory behaviour against Wolverhampton Wanderers Football Club Equality Policy itself, the person may raise the matter by writing directly to Equality Lead, Zoe Brough — Head of Human Resources.

The 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 be 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 Wolverhampton Wanderers Football Club Board. If the investigation reveals unacceptable discriminatory behaviour on the part of a person or organisation the 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 Wolverhampton Wanderers Football 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 Wolverhampton Wanderers Football Club is subject to allegations of unlawful discrimination in a court or tribunal, the club 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.

Adopted by Wolverhampton Wanderers Football Club Board 17/05/2019