



FULHAM FC

Equality, Diversity and Inclusion Policy
Season 2024/27

Introduction

Fulham Football Club and Fulham Football Club Foundation and its group of companies (together the “Club”) maintain a zero-tolerance approach to racism and take any form of discriminatory or violent abuse of its staff, players, and supporters extremely seriously. The club maintain a long-standing commitment to help tackle any form of racism or discrimination. We believe that every person who engages with the Club has a right to be treated fairly, with dignity and respect, irrespective of their personal characteristics.

1. Equality Statement

- 1.1. Fulham Football Club and Fulham Football Club Foundation (“the Club”) endorses the principle of equality and will strive to ensure that everyone who wishes to be involved in the Club whether as players, match-day fans, staff, Board members, participants in outreach programmes and other people engaged with the club’s activities (for example, suppliers, corporate partners):
- 1.2. Has a genuine and equal opportunity to participate to the full extent of their own ambitions and abilities, without regard to their age, disability, gender reassignment, marital or civil partnership status, pregnancy or maternity, race, religion and belief, sex, or sexual orientation; and
- 1.3. Can be assured of an environment in which their rights, dignity and individual worth are respected, and that they are able to enjoy their engagement at the club without the threat of intimidation, victimisation, harassment, bullying and abuse.

2. Legal Obligations

2.1. The Club is committed to avoiding and eliminating discrimination of any kind in the Club and recognises that is unlawful to discriminate directly or indirectly because of an individual’s age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage or civil partnership, pregnancy, or maternity. These are grouped as protected characteristics.

2.2. Individuals will be protected if they have a protected characteristic, are assumed to have a protected characteristic, are associated with someone who has a protected characteristic or with someone who is assumed to have a protected characteristic.

2.3. Examples of the relevant legislation in the behaviours are given in Appendix 1.

3. Positive Action

- 3.1. As well as complying with legislation, the Club will promote EDI by taking positive steps to counteract the effects of physical or cultural barriers – whether real or perceived – that restrict the opportunity for all sections of the community to participate equally and fully.
- 3.2. The Club will seek to institute, support, or contribute to appropriate measures or initiatives that enable access to the Club, as well as requiring participation in associated activities by people from any group that is under-represented in the Club or has difficulty accessing it.

4. Implementation

4.1. The following steps will be taken to publicise this policy and promote EDI throughout the Club:

- copy of this document will be published on the Club's website.
- The Club's management Board will take overall accountability for ensuring that the policy is observed.
- The Club's management Board will take full account of the policy in arriving at all decisions in relation to activities of the Club.
- The Club will implement regular audits and create surveys and other initiatives designed to assess the level of participation of different sections of the community in the club and will take account of findings in developing measures to promote and enhance equality and Inclusion throughout all areas of the business.
- The Club will provide access to a rolling programme of training (for example, online face to face, briefings) for all its management Board, players, match-day fans, staff, participants in outreach programmes, suppliers and others engaging with the club activities to raise awareness of both collective and individual responsibilities.

4.2. **It will be a condition of working with the Club that suppliers:**

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

5. Responsibility, Monitoring and Evaluation

5.1. The Director of Safeguarding & the EDI Lead are responsible for the day-to-day implementation of EDI across the Club.

5.2. The Equality Working Group will review all the Club's activities and initiatives against the aims of the policy and should report formally on this issue to the Equality Strategic Steering Group (ESSG) annually.

5.3. The CEO will review any measures or initiatives that the Club may institute or take part in to promote and enhance EDI. The Inclusion department will report their findings annually to the management Board.

5.4. The Equality Working Group will review and measure initiatives that the club may implement or take part in to promote and enhance EDI across the Club and will report their findings annually to the management board.

5.5. This equality policy will be reviewed by the Equality Working Group every three years or sooner where new developments in relevant legislation suggests such review. The next review is scheduled for June 2024.

6. Complaints and Compliance

- 6.1. The Club consider all forms of discriminatory behaviour, including but not limited to behaviour described in Appendix 1 of this policy as unacceptable, and is concerned with ensuring individuals feel able to raise any grievance, report a complaint related to such behaviour without fear of being penalised for doing so.
- 6.2. Appropriate disciplinary action will be taken against any member of staff who is thought to be in breach of this policy. Any match day fan, participant or other individuals engaged with the Club's activities who breach the EDI policy will be contacted by a senior member of staff for further investigation into the matter prior to any decision or outcome being made.
- 6.3. Any individual who believes he or she has been treated in a way they consider to be in breach of this policy should in the first instance, raise a complaint via Enquiries@fulhamfc.com.
- 6.4. The Club will appoint a suitable representative to investigate the complaint. 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.
- 6.5. The parties in question will be notified of the outcome of the investigation in writing. 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 exclusion from Club. The incidents review panel will decide what sanction is appropriate and will consider the severity of the matter and consider any mitigating circumstances prior to sending a recommendation to Head of Safety.
- 6.6. Where the violation of the EDI policy by way of intimidation, harassment, victimisation, bullying or abuse amounts to a criminal offence, the appropriate authority will be informed.
- 6.7. If an individual or organisation associated with the Club is subject to allegations of unlawful discrimination in a court or tribunal, the Clubs management board will co-operate fully with any investigation carried out by the relevant lawful authorities and, subject to the outcome will determine if further action is required.

7. Appendix 1

7.1. Legal Rights

- The Equality Act 2010 brings together over 116 separate pieces of legislation into one single Act. The Act provides a legal framework to protect the rights of individuals and advance Equality of opportunity for all. It provides Britain with a discrimination law which protects individuals from unfair treatment and promotes a fair and more equal society.
- Discrimination refers to unfavourable treatment based on characteristics, which are known as the "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, 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.

7.2. Forms of Discrimination and discriminatory behaviour include the following:

Direct discrimination

Direct discrimination can be described as less favourable treatment on the grounds of one 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.

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.

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.

Hate Crime

The police and the CPS have agreed the following definition for identifying and flagging hate crimes:

“Any criminal offence which is perceived by the victim or any other person, to be motivated by the hostility or prejudice, based on a person's disability or perceived disability; race or perceived race; or religion or perceived religion; or sexual orientation or perceived sexual orientation; or transgender identity perceived transgender identity. “

Intimidation

Intimidation or harassment is a personalised form of anti-social behaviour, specifically aimed at individuals, which could be based on their protected characteristics. The Act defines anti-social behaviour as “conduct that has caused, or is likely to cause, harassment, alarm or distress to any person. “Threats to kill, rape, serious violence, stalking and property damage, as well as intimidating behaviour that is face-to-face or by letter, telephone call or online are examples of intimidation that are all criminal offences.

Abuse

As an employer or manager, there may be situations where verbal abuse, threats or name calling (and harassment) at work could be a crime, for example, if a supporter or staff tells you they have been physically attacked, sexually assaulted, the victim of a hate crime, for example racist or homophobic abuse or threatened with violence. Such incidents may be a criminal offence and should be reported to the police and other relevant agencies.

Hostility

There is no legal definition of hostility so the CPS uses the everyday understanding of the word which includes ill-will, spite contempt, prejudice, unfriendliness, antagonism, resentment, and dislike.

Incitement to hatred

The offence of incitement to hatred occurs when someone acts in a way that is threatening and intended to stir up hatred. That could be in words, pictures, videos, music and includes information posted on websites.

7.3. **Hate content may include:**

- Messages calling for violence against a specific person or group.
- Web pages that show pictures, videos, or descriptions of violence against anyone due to their perceived differences.
- Chat forums where people ask other people to commit hate crimes against a specific person or group.

8. Club Investigation

- 8.1. The Club will investigate the reported allegations.
- 8.2. The investigation will be conducted impartially, confidentially and without avoidable delay. Any person against whom a complaint is made will be informed of what is alleged and given the opportunity to present their side of the matter.
- 8.3. The parties in question will be notified of the outcome, in writing. If the investigation reveals unacceptable discriminatory behaviour, then the Club may impose sanctions on that person or organisation.
- 8.4. In Imposing a sanction, the Club will consider the severity of the matter and consider any mitigating circumstances. Sanctions may range from a written reminder concerning future conduct extending to temporary or permanent exclusion from Club activities.
- 8.5. If the Club believes that there may be a violation of this policy by way of harassment, victimisation or discrimination which amounts to a criminal offence, the appropriate authority will be informed. The Club will co-operate fully with any investigation carried out by the rightful authorities and subject to the outcome, may consider acting as detailed above in relation to the matter concerned.