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| DEPARTMENT | LEGAL AND GOVERNANCE |
| POLICY/PROCEDURE | EQUALITY, DIVERSITY & INCLUSION POLICY |
| DATE OF ISSUE | MAY 2023 |
| DATE OF REVIEW | MAY 2024 |
| VERSION | 4 |

1. Policy Statement and Commitment

Lincoln City Football Club (LCFC) is committed to eliminating discrimination in both its role as an employer and as a football academy. LCFC aims to create a culture that respects and values each other's differences, that promotes dignity, equality, diversity and inclusion, and that encourages individuals to develop and maximize their true potential. We are committed, wherever practicable, to achieving and maintaining a workforce and academy that broadly reflects the local community in which we operate.

2. Commitment

LCFC's commitment to Equality, Diversity and Inclusion is:

- To create an environment in which individual differences and contributions of all our employees, academy members, trustees and volunteers are recognised and valued.
- To create an environment that promotes dignity and respect for all. No form of intimidation, bullying or harassment will be tolerated, in line with our Anti-Bullying and Harassment policy.
- To ensure training, development and progression opportunities are available to all. As part of this commitment, all employees, volunteers, apprentices and young people will be given equality of opportunity in respect of recruitment, training and assessment, and will be promoted solely on the basis of their merits, abilities and potential.
- To promote equality in the workplace, which it believes is good management practice and makes sound business sense.
- To regularly review all employment and volunteering practices and procedures to ensure that no job applicants, staff, academy members, trustees or volunteers are treated less favourably than others.
- To regularly review services to ensure they are accessible and appropriate to all groups within society.
- To treat breaches of equality policy seriously and to take disciplinary action, when required, in accordance with our Disciplinary Policy and Procedures.
- To provide information and training to all employees, academy members, trustees and volunteers so that they are fully aware of the issues relating to Equality, Diversity and Inclusion and their responsibilities relating to it.
- To ensure the policy is fully supported by the Board of Directors.
- To review this Equality, Diversity and Inclusion Policy and its implementation on an annual basis.
- To regularly monitor and evaluate progress made against this policy, review all practices, procedures and operations on an ongoing basis, and inform employees and members of their impact.

3. Purpose

The purpose of this policy is to provide equality and fairness for all our employees, volunteers, players and service users where there is zero tolerance of prejudicial attitudes, behaviours, unfair treatment or discrimination in relation to protected characteristics within UK legislation. Kick It Out is committed to equality, inclusion and anti-discrimination. The organisation will continue challenging discriminatory behaviours and promoting equality, diversity and inclusion in football. LCFC understands the importance of raising awareness, education, investigating concerns and complaints, widening diversity and opportunities for under-represented groups and individuals, as well as promoting diverse role models.

LCFC recognises that certain sections of the community have been affected by past discrimination and perceived cultural differences. It is critical for us to be responsive to change. Innovative thinking and different ideas are needed to deal with the ever-increasing pace of change. Our ability to contribute to the success of LCFC through creativity and improvement will be greatly enhanced by the diversity of peoples' experiences and perspectives. LCFC's ability to attract



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and retain the highest calibre staff and volunteers from the widest pool of people, whom we serve, is essential in developing a leadership position.

4. Principles

LCFC is committed to promoting equality, diversity and inclusion and to confronting and eliminating discrimination within its services and activities in respect of the following 'Protected Characteristics' set out in the Equality Act 2010:

- Age
- Disability
- Sex
- Gender Reassignment /gender identity
- Marriage and Civil Partnership
- Pregnancy and Maternity
- Race (including ethnic origin, colour, nationality and national origin)
- Religion or Belief
- Sexual Orientation

LCFC also recognises that not all disabilities are visible and as such includes communication and learning differences (such as Autistic Spectrum Disorder and Dyslexia).

LCFC shall ensure that:

- it provides equal opportunities for all those employed by the Club or who wish to participate in sport;
- everyone is treated fairly and with respect;
- it will provide access and opportunities for all members of the community to participate in, and make use of, its services.
- no one is treated less favourably on the grounds of age, colour, disability, ethnicity, parental or marital status, nationality, religious belief, social status, gender, or sexual preference; and
- All fans, players, staff, volunteers and participants and other people who engage with the Club's activities can be assured of an environment in which their rights, dignity and individual worth are respected, and that they are able to engage with our staff and representatives in an environment free from discrimination.

5. Legal requirements

LCFC is required by law not to discriminate against its employees and recognises its obligations to comply with EU Directives and UK law.

Discrimination can take the following forms:

Direct Discrimination

This means treating someone less favourably than you would treat others in the same circumstances.

Indirect Discrimination

This occurs when a job requirement or condition is applied equally to all and has a disproportionate and detrimental effect on one or more groups because fewer of that group can comply with it, and the requirement cannot be justified in relation to the job.

When decisions are made about an individual, the only personal characteristics taken into account will be those that, as well as being consistent with relevant legislation, are necessary to the proper performance of the work involved.

Harassment



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Harassment can be described as inappropriate actions, behaviour, comments or physical contact that is objectionable or causes offence to the recipient. It may be of a sexual or racial nature or it may be directed towards people because of their age, their sexuality, a disability or some other characteristic.

Victimisation

This occurs when someone is treated less favourably than others because he or she has taken action against LCFC under relevant legislation or provided information about such discrimination (also known as 'Whistle-blowing').

LCFC is committed to ensuring that its employees, members and volunteers are able to conduct their activities in an environment that is free from harassment or intimidation.

LCFC will take steps to prevent victimisation or other unfair treatment of its employees, academy members or volunteers.

LCFC regards discrimination and harassment as described above as gross misconduct and any employee of the Company, participant or volunteer who discriminates against any other person will be liable to appropriate disciplinary action.

6. Responsibility

The Chief Executive Officer has direct and overall responsibility for the implementation of the Equality, Diversity and Inclusion Policy, and for dealing with any actual or potential breaches of the policy, with the support of the Board of Directors and Senior Management Team.

All employees, academy members, trustees and volunteers have individual responsibility to:

- Respect, act in accordance with, and thereby support and promote the spirit and intentions of this policy.
- Act as role models for good practice, and to adopt a proactive role in challenging improper behaviour.
- Follow procedures to ensure equal opportunity and to be non-discriminatory.
- Draw the attention of management to suspected or alleged discriminatory practices.
- Refrain from harassing or intimidating other employees, academy members, trustees, volunteers, visitors or opponents of LCFC on any of the grounds cited in this policy statement.
- Report any concerns about inequitable or discriminatory practices or behaviour without delay to either the Chief Executive Officer or General Counsel.

7. Implementation

A copy of this document will be available to all staff, members and volunteers of LCFC.

LCFC will take measures to ensure that its employment practices are non-discriminatory.

No job applicant will be placed at a disadvantage by requirements or conditions which are not necessary to the performance of the job or which constitute unfair discrimination.

A planned approach will be adopted to eliminate barriers that discriminate against particular groups.

LCFC will ensure that its consultants and advisers can demonstrate their commitment to equality principles and practice.

8. Positive Action

Where LCFC identifies an issue or trend arising from disadvantage or imbalance of opportunity that an individual or group with a protected characteristic could face, the Club is committed to lawfully using positive action to address it. The aim is to contribute to building better relationships with our communities and encourage equality, diversity and inclusion across the Club.



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9. Reporting

LCFC aims to empower individuals to report concerns, knowing that confidentiality (where appropriate) and action will be taken, and a fair and thorough investigation will follow.

If an employee has concerns they should speak with their Line Manager or the Chief Executive Officer as soon as possible. The Club will support those that have reported incidents or raised concerns.

If a member of the public raises concerns or matters for investigation the Club will act promptly and proportionately, and communicate incidents to staff (where appropriate), the Board of directors and external agencies (if required). Where relevant and possible, the Club will recognise and follow up with the person(s) reporting or raising concerns.

All reported incidents by the public will be fed back to the Chief Executive Officer as soon as possible, or in urgent cases, a member of the senior management team who will take action accordingly.

Incidents and relevant matters for concern will be taken to the Board of directors or relevant sub-committee for awareness, learning and resolution.

All incidents and concerns raised will be recorded, investigated and learning taken to continuously improve services, develop understanding, increase inclusion and identify future training.

10. Breach of the policy

LCFC is concerned that individuals should feel able to raise any grievance and no employee will be penalised for doing so unless the complaint is not true or not made in good faith.

To safeguard individual rights under this policy, a person who believes that he/she has suffered unfair treatment within the scope of the policy may raise the matter through appropriate company procedures.

Where such matters occur, a written report of the circumstances should be made to the Chief Executive Officer at the earliest opportunity. If it is deemed necessary, the Chief Executive Officer will take appropriate action, which may include disciplinary action being taken against any employee who violates this policy.