



EQUALITY POLICY

People & Talent

September 2023



Foreword

Newcastle United Football Club are fully committed to creating and upholding a culture of equality, diversity and inclusion (EDI). We believe that every person who engages with the Club has a right to be treated fairly and with dignity and respect, irrespective of their personal characteristics.

Creating a culture of, and reputation for, equality requires a collaborative approach: every single person involved with the Club – including players, supporters, staff, contractors, volunteers, corporate partners, guests and suppliers – are expected to share this commitment and to act in accordance with it, and with our Equality Policy.

Newcastle United Football Club are committed to adopting a zero-tolerance approach to discrimination and will uphold our Policy in its entirety. We expect anyone employed, associated or involved with the Club to report any concerns should they have any reason to believe it has been breached in any way.

Our Executive Team is fully committed to ensuring that any suspicions, reports and/or allegations of poor practices which may have breached our Equality Policy are taken seriously and investigated fully, involving appropriate external agencies or authorities where necessary. Our Senior Management Team is committed to working proactively to enhance the diversity of the Club.

The Club's Inclusion Team will ensure the principles of our Equality Policy are upheld and embedded within our day-to-day operations and activities. The team will be responsible for handling, in the first instance, any reported incidents of inequality or discrimination.

We will continue to monitor and measure progress towards creating a truly inclusive environment for everyone involved with the Club, not only to ensure we fully meet our responsibilities in line with prevailing legislation but to ensure we create the right culture and environment to help us become role models in our field. This will enable the attraction and retention of the right players, supporters, staff, contractors, corporate partners and suppliers, protecting and promoting our reputation as a leader in football.

The Equality Policy does not form part of any contract of employment or other contract to provide services, and we may amend it at any time.

Darren Eales, Chief Executive Officer



Equality, Diversity and Inclusion Statement

Newcastle United Football Club endorses the principles of EDI. We will strive to ensure that everyone who wishes to be involved in the Club including players, supporters, members of staff, job applicants, Board members, participants and other stakeholders 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 and civil partnership status, pregnancy and maternity, race, religion or belief, sex or sexual orientation.

The Club will not tolerate the discrimination, harassment or bullying (**as defined in Appendix I**) of any individual or group, regardless of characteristic, whether protected or not, and any such behaviour will be met with appropriate action in whatever context it occurs.

We would encourage players, supporters, employees, contractors, volunteers, corporate partners, guests, and suppliers to discuss with us, at the earliest opportunity, what support they may need so that we can look at adjustments whether that be in the workplace or whilst visiting the Stadium.

If you are an employee, contact your line manager, EDI or HR team. If you are a contractor or supplier to speak with your contact at the Club. If you are a supporter, please contact UnitedAsOne@nufc.co.uk

Legal Obligations

Newcastle United Football Club are committed to avoiding and eliminating discrimination of any kind in the Club and will under no circumstances condone unlawful discriminatory practices. The organisation takes a zero-tolerance approach to intimidation, harassment, victimisation, bullying or abuse. Examples of the relevant legislation and the behaviours are given in **Appendix I**.

Positive Action

Positive Action involves actions that reduce disadvantage and/or increase representation specifically when it comes to deciding between equally qualified candidates.

The Club may, where suitable and based on data and research, use Section 158 or Section 159 of 'The Act' to address underrepresentation throughout its recruitment, retention and promotion activities.

This would be done on merit and to meet one of the three needs; overcome or minimise a disadvantage, have their different needs met or to be able participate in a particular activity.

Implementation

The following steps will be taken to publicise this policy and promote EDI in Newcastle United Football Club:

- An external facing version of this document will be published on Newcastle United Football Club's website.
- Newcastle United Football Club's Board will take overall accountability for ensuring that the policy is observed and accounted for in decision making.



- Newcastle United Football Club will implement regular audits, surveys or other initiatives designed to assess the level of participation from diverse groups of people in the Club, including employed roles, and will take account of the findings in developing measures to promote and enhance EDI in the Club.
- Newcastle United Football Club will provide access to a rolling programme of training (for example, online, face-to-face, briefings) for all its players, match day fans, staff, Board members and other people engaged with the Club's activities, to raise awareness of both collective and individual responsibilities. This will be delivered as a suite of mandatory EDI training as well as bespoke training that will be allocated on a role specific basis such as hiring manager training regarding unconscious bias.
- It will be a condition of working with Newcastle United Football Club that suppliers:
 - Commit to act in accordance with this policy; and
 - Support such measures and initiatives that Newcastle United Football Club may institute or take part in to advance the aims of this policy.

Responsibility, Monitoring, and Evaluation

The Board and CEO will be accountable for ensuring the implementation of this policy. The Director of People and Talent along with the Head of Inclusion will be responsible for the day-to-day implementation of EDI in the Club.

The CEO will review all Newcastle United Football Club activities and initiatives against the aims of the policy. An annual report will be provided to the Board to report activity and findings.

This policy will be reviewed annually (or when necessary due to changes in legislation) with changes submitted to the Board in line with the policy review process.

Complaints and Compliance

Newcastle United Football Club considers all forms of discriminatory behaviour, including (but not limited to) behaviour described in **Appendix I**, as unacceptable, and is concerned with ensuring individuals feel able to raise any grievance or complaint relating to such behaviour and made in good faith without fear of being penalised for doing so.

Appropriate action will be taken against any player, supporter, member of staff, Board member, participant in outreach programmes and other people engaged with the Club's activities who violate the Newcastle United Football Club Equality Policy.

Any person who believes that they have been treated in a way that they consider to be in breach of this policy by a player, supporter, member of staff, Board member, participant in outreach programmes or other people engaged with the Club's activities should, in the first instance and if they feel comfortable to do so, complain to that person.



If this does not resolve the matter, or in the case of allegations of discriminatory behaviour or behaviour that may bring the Club's reputation into disrepute, the person may raise the matter as follows:

Supporters – use the contacts below:

Match day issues – Text 'Help' to 60070 with details of the incident or approach a steward.

Inclusion Team – UnitedAsOne@nufc.co.uk

Supporter Services - supporter.services@nufc.co.uk

Newcastle United Football Club will investigate the complaint personally and appoint an appropriate 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. Depending on the allegations raised, the investigation may be handled under one of the following policies where the Club's staff are concerned; Disciplinary, Grievance, or Whistleblowing.

The parties in question will be notified of the outcome of the investigation, in writing, with outcomes aligned to our internal policy for staff and the standards of behaviour outlined by the Premier League Commitment Document for supporters.

If the investigation reveals unacceptable discriminatory behaviour on the part of a person or organisation, Newcastle United Football 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 Newcastle United Football Club activities. For those incidents that are related to Football the Premier League Commitment Document will also be used to support any sanctions.

Where there is a violation of the Equality Policy by way of intimidation, harassment, victimisation, bullying or abuse which amounts to a criminal offence, the appropriate authority will be informed.

If an individual or organisation associated with Newcastle United Football Club is subject to allegations of unlawful discrimination in a court or tribunal, Newcastle United Football Club's 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.



APPENDIX I

Relevant legislation and forms of unacceptable discrimination

Legal Rights

Newcastle United Football Club are committed to avoiding and eliminating unfair discrimination of any kind and will not, under any circumstances, condone unlawful discriminatory practices.

The Equality Act 2010 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.

Under The Equality Act 2010, individuals are protected from discrimination on grounds of their 'protected characteristics'. Protected characteristics are defined as a person's age, disability, gender reassignment, marital or civil partnership status, pregnancy and maternity, race (including colour, nationality and ethnic or national origin), religion or belief, sex and sexual orientation.

Forms of discrimination and discriminatory behaviour include the following:

Direct discrimination

Direct discrimination can be described as treating someone less favourably (or, in the case of pregnancy and maternity, unfavourably) because of a protected characteristic.

Indirect discrimination

Indirect discrimination occurs when a provision, criterion or practice is applied to everyone but puts people with a particular protected characteristic at a disadvantage compared with others.

Harassment

Harassment refers to unwanted conduct relating to a protected characteristic that has the purpose or effect of violating a person's dignity, or which creates an intimidating, hostile, degrading, humiliating or offensive environment for that person.

Victimisation

Victimisation occurs when someone is retaliated against because they complained or supported someone else's complaint about discrimination or harassment. This includes instances where a person is retaliated against because someone mistakenly believes they have raised a complaint or supported someone else's complaint.

Bullying

Bullying refers to offensive, intimidating, malicious or insulting behaviour involving the misuse of power that can make a person feel vulnerable, upset, humiliated, undermined or threatened. Power does not always mean being in a position of authority but can include both personal strength and the power to coerce through fear or intimidation.



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 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 or perceived transgender identity."

Newcastle United Football Club will work with Northumbria Police or relevant agency where a hate crime has been identified to support any investigation.

Intimidation

Intimidation is a personalised form of anti-social behaviour, specifically aimed at individuals, which could be based on their protected characteristics.

The Anti-social Behaviour, Crime and Policing Act 2014 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, inflict serious violence, stalk or cause property damage (whether made face-to-face or by letter, telephone call or online) are examples of intimidation that are all criminal offences.

Abuse

There may be situations where verbal or physical abuse, sexual assault, hate crimes, threats, name-calling or harassment takes place at work. Such incidents may be a criminal offence and should be reported to the Police and other relevant agencies. Please speak to a member of the HR team for advice to ensure the correct support is given to the individual and the appropriate agencies are contacted.

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.