Promoting equality and fairness in the Premier League
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Introduction

The Premier League Equality Standard (the Standard) was revised by the Premier League in 2015 to replace, and build on, Kick it Out’s Equality Standard for Professional Football Clubs.

The revised Standard is now in line with the UK-wide standard – “The Equality Standard for Sport, A Framework” – developed and managed by the home country Sports Councils.

The Premier League is committed to tackling discrimination and promoting equality and Shareholders have agreed a timetable for clubs to achieve each level of the Standard. This is set out in Rule J.4. which came into effect on 1st July 2015.

The Standard reflects current equality legislation and case law and provides a framework to help guide professional football clubs towards achieving equality. It sets out a series of key requirements to support the development of equality policy and practices across all areas of the club’s operation, thereby helping them to meet the relevant legal, and other, obligations.

Through undertaking this work, it also encourages clubs to identify new target markets and fans for the future, and develop partnerships, activities and projects targeted at under-represented communities and individuals.

The EFL Code of Practice
The PL Equality Standard takes into account the EFL Code of Practice ensuring that promoted clubs which have achieved the Code can progress smoothly to the Standard.

Legal compliance
The Standard does not, of itself, legally ‘equality proof’ the club’s practices and policies and it is still the requirement of each club to ensure that all policies, and their implementation, are legislatively compliant.

Requirements
The Standard covers all areas of a club’s activity, including its role as an employer, and the work of the Community Trust or equivalent. A senior club member of staff should take the role of Lead Officer for equality and be responsible for driving the work leading to submission for the Standard.
Levels of achievement

There are three levels of achievement, Preliminary, Intermediate and Advanced.

- Each level contains a number of requirements that have to be met in order to achieve the level
- Each requirement is broken down into a list of expected evidence necessary to meet the requirement
- Additional guidance is provided at the end of this document which indicates the type of evidence that might be provided for each requirement
- The levels are cumulative – whatever level a club is submitting for it is expected that they still meet the requirements of the previous level achieved.

Principles of each level

Preliminary Level

The club is clear about what it needs to do to achieve equality.

The club will have:
- Demonstrated a commitment to equality at the highest level and communicated this to all people associated with it
- Developed an Equality Policy and reviewed its communications activities and HR policies
- Produced an Equality Action Plan for all areas of activity including an assessment of the club’s current supporter base, community development participation and clear guidelines for dealing with abuse.

Intermediate Level

The club is taking action to address issues.

The club will have:
- Built relationships with local under-represented communities and individuals
- Implemented and regularly reviewed the Equality Action Plan
- Identified actions that will work towards increasing the diversity of the Board and employees
- Determined how it will use Equality Impact Assessments to support its work towards equality
- Delivered appropriate training and/or briefings to all staff and key personnel associated with the club.

Advanced Level

The club is committed to a cycle of continuous improvement with regards to equality.

The club will have:
- Made significant progress towards diversity as Board members, employees, coaches, supporters and as participants in outreach programmes
- Demonstrated good practice in the way it addresses under-representation across all levels and areas of activity and it measures the effectiveness of this through Equality Impact Assessments
- Demonstrated leadership at all levels of the organisation with regard to equality
- Mainstreamed equality throughout the organisation.
Scope of the Standard

The Standard encompasses all areas of inequality which are linked to characteristics protected under the Equality Act 2010 to ensure that individuals are not discriminated against on the grounds of any of the following:

**Age**
Where this is referred to, it refers to a person belonging to a particular age (e.g. 32 year olds) or range of ages (e.g. 18 - 30 year olds).

**Disability**
A person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on that person’s ability to carry out normal day-to-day activities.

**Gender reassignment**
The process of transitioning from one gender to another.

**Marriage and civil partnership**
Marriage is no longer restricted to a union between a man and a woman but now includes a marriage between a same-sex couple. Same-sex couples can also have their relationships legally recognised as ‘civil partnerships’. Civil partners must not be treated less favourably than married couples (except where permitted by the Equality Act).

**Pregnancy and maternity**
Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

**Race**
Refers to the protected characteristic of race. It refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.

**Religion and belief**
Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live for it to be included in the definition.

**Sex**
A man or a woman.

**Sexual orientation**
Whether a person’s sexual attraction is towards their own sex, the opposite sex or to both sexes.

In addition, the club may have specific groups it works with such as people not in employment, education or training (NEETS), or young offenders that it provides its services to and these can be included in the evidence submission to provide a full picture of the club’s activities.
Assessment process

There are three phases to the assessment process:

1. Self-assessment by the club and submission of evidence supported by the Premier League where appropriate.

2. Independent evaluation and assessment of the evidence by an Assessor.

3. Verification and recommendation, by the Premier League Equality Standard Panel, that a club has achieved a level of the Standard.
1 Self-assessment and submission of evidence

The process of working towards a level of the Standard involves the club gathering and submitting evidence that is sufficient to meet the requirements detailed for each level.

During the self-assessment period, the club will be advised and guided on the requirements of the Standard through the following means:

- A suite of support workshops provided by the Premier League covering key elements of the Standard and aiming to build capacity in club personnel with regard to equality
- Assessor visits (see below)
- A designated Club Support Officer provided by Kick It Out throughout the self-assessment process to:
  - Advise on the specific requirements of the Standard and the type of evidence to consider
  - Share good practice from other clubs and the football sector
  - Provide relevant templates to assist clubs with meeting the requirements of the Standard
  - Signpost to specialist organisations that can help the club engage with people from different communities sharing protected characteristics
  - Ensure the club is on track with regard to the Standard timelines and critical dates
  - Provide specialist knowledge regarding equality and football.

Assessor visits

- Clubs will receive one Assessor visit prior to submission at Preliminary level to:
  - Meet key staff involved in delivering equality including the CEO, Lead Officer for Equality, other staff delivering equality, a sample of other staff, relevant Board members and other people involved with the club e.g. fans
  - Discuss the evidence being presented by the club and ask relevant questions to support their assessment of the status of the club’s submission.

- Clubs will receive two Assessor visits prior to submission at Intermediate level and three at Advanced level to:
  - Meet key personnel at the club and identify any areas where there may be a shortfall in evidence against the requirements of the Standard. In these situations the Assessor will agree with the club and the Support Officer a plan to address any shortfall
  - Meet key staff involved in delivering equality including the CEO, Lead Officer for Equality, other staff delivering equality and a sample of other staff; relevant Board members and other people involved with the club e.g. fans
  - Discuss the evidence being presented by the club prior to submission and ask relevant questions to support their assessment of the status of the club’s submission.

The Support Officer will attend the club visits alongside the Assessor.

Submission of evidence

- Submission of relevant evidence will be via a Premier League Portal with controlled access for the club to upload their evidence by the final submission date. Evidence will not be accepted via any method other than the Portal and the verbal discussions at Assessor visits
- Additional guidance is provided at the end of this document which indicates the type of evidence that the club may produce and submit for Assessment. It is a guide and is not prescriptive as each club is different. Suitable alternatives can be presented if they meet the requirements and will be judged on their merits.

Once a club has achieved the Advanced level of the Standard they are then subject to periodic equality healthchecks led by the Panel Chair. The purpose is to ensure that the club still meets the requirements of the Advanced level and has continued to progress in their equality work through the delivery of their Equality Action Plan.
2 Independent evaluation by the Assessor

The Assessors are appointed by the Premier League and are required to conduct an independent evaluation and assessment of the progress of the club towards the relevant level of the Standard and to produce a draft Assessment Report that is submitted to the Equality Standard Panel.

Following the final club visit and submission of evidence via the Portal the Assessor will:
• Scrutinise the evidence presented by the club and produce a draft Assessment Report for the Panel to determine whether each requirement of a level of the Standard has been met
• The Assessor draws from the written evidence submitted by the club but primarily from their discussions with club personnel in order to produce a draft Assessment Report.

3 Premier League Equality Standard Panel

The Premier League Equality Standard Panel (the Panel) is the final stage in the assessment process and its role is to verify that the requirements of the Standard have been met and to recommend that the club has achieved a level of the Standard. The Chair and Panel members are independent of the PL and the clubs and have been appointed for their expertise and experience in equality and diversity across a range of industries.

Panel session locations
• Preliminary and Intermediate Panel sessions are held at the PL offices in London
• Advanced Panel sessions are held at the club
• Healthcheck sessions are held at the club.

Prior to the Panel session
The Panel receives and scrutinises the Assessor’s draft Assessment Report as well as the club’s Equality Action Plan and Equality Monitoring Report.

During the Panel session
All Panel sessions are confidential and the Secretariat is provided by the PL.
The Panel session takes the form of a 25-minute presentation by senior club representatives to:
• Bring their submission to life and explain how the club meets the requirements of the Standard
• Showcase the club’s equality work
• Identify any challenges the club faces with regard to equality
• Highlight its progress towards equality
• Identify subsequent, priorities, targets and tactics for the club’s equality work.
The Panel will then further scrutinise the club’s submission through relevant, probing questions – for approximately 45 minutes – about the presentation, and the progress the club is making towards equality.

When the club representatives have left the Panel session the Panel members:
- Consider the club’s presentation and the progress the club is making towards equality
- Identify strengths in the club’s equality work and areas to develop further
- Make an objective decision as to whether it can verify and recommend that the club has met the requirements of a level of the Standard.

Each club will normally be allocated 70 minutes comprising:

<table>
<thead>
<tr>
<th>Presentation</th>
<th>Question &amp; Discussions</th>
<th>Panel Decision</th>
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<tbody>
<tr>
<td>25 minutes</td>
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<tr>
<td>Presentation by the club</td>
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<tr>
<td>45 minutes</td>
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<td>Questions and discussions and club representatives leave</td>
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After the Panel session
Following the Panel session a final Assessment Report is produced by the Panel Secretariat within ten working days. This is sent to the club with a letter signed by the Panel Chair. The letter and final Assessment Report will reflect the recommendation of, and feedback from the Panel, about the level of the Standard and the club’s progress towards equality, including:
- Detail of the strengths and areas for development for the club within the evidence submitted;
- A recommendation, along with a justification, as to whether the club has successfully met the requirements of a level of the Standard.
  - If they have, the recommendation will be ‘achieved’
  - If they have not, then the recommendation will be ‘continues to work towards the level’
  - If the recommendation is ‘continues to work towards the level’, specific guidance will be provided to the club on what is required prior to resubmission.

Appeals
The Premier League will deal with any appeal from a club against the decision, in line with its appeals process.
Premier League Equality Standard requirements
## Premier League Equality Standard requirements

<table>
<thead>
<tr>
<th>Requirement</th>
<th>Evidence</th>
<th>Supporting resources</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>1. Your club is committed to achieving equality across all areas of operation</strong></td>
<td>1.1 Set responsibility for equality at the highest level in the club. Board and CEO (or equivalent) have responsibility for equality; Board and senior staff have received briefings on equality and the relevance to the club.</td>
<td><strong>ES10</strong> Equality Policy Guidance and Template</td>
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<td></td>
<td>1.2 Develop and publicise an Equality Policy for the club and a statement of commitment, including the club’s zero tolerance policy on abuse, discrimination and harassment.</td>
<td><strong>ES2</strong> Equality Action Plan Template <strong>ES11</strong> Human Resources Policy Audit Guidance and Template <strong>ES4</strong> Communications Equality Audit Guidance and Template</td>
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<td></td>
<td>1.3 Develop an Equality Action Plan, signed off by the Board, which encompasses all areas of the club’s operation; the club has an internal equality working group which is responsible for ensuring that the Equality Action Plan is developed and implemented.</td>
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<td></td>
<td>1.4 Ensure all people engaged with the club (such as Board, staff, players, fans and others) are aware of the club’s commitment to equality and its expected standards of behaviour using all possible methods to publicise the club’s stance on equality.</td>
<td></td>
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<tr>
<td><strong>2. Your club is aware of its current profile and position in terms of equality and its policies seek to advance equality</strong></td>
<td>2.1 Undertake regular audits of staff, players, Board, match-day fans and club outreach programmes; analyse the audit findings and areas for improvement; include actions to address under-representation in the Equality Action Plan; produce an equality monitoring report and present it to the Board.</td>
<td><strong>ES15</strong> Equality Monitoring Report Guidance and Template <strong>ES5</strong> Equal Opportunities Staff Audit Guidance and Questionnaire <strong>ES12</strong> Season Ticket Renewal Guidance and Monitoring Form <strong>ES7</strong> Audit of Outreach Activity Participants Guidance and Questionnaire</td>
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<td></td>
<td>2.2 All recruitment practices throughout the club reflect its commitment as an equal opportunities employer; club has a comprehensive Recruitment and Selection Policy that references equality and diversity within it.</td>
<td><strong>ES16</strong> Equality Monitoring Recruitment Guidance and Template</td>
</tr>
<tr>
<td><strong>3. Your club and your stadium are free from incidents of discrimination, abuse and harassment</strong></td>
<td>3.1 Develop and monitor a policy (and procedures) on reporting, collating and dealing with incidents of discrimination, harassment and abuse, for anyone associated with the club.</td>
<td><strong>ES8</strong> Match-Day Complaint Reporting Process <strong>ES6</strong> Incidents Match-Day Form</td>
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<td></td>
<td>3.2 Communicate policy and procedures for reporting allegations of discrimination, harassment and abuse to all members of staff, players, Board, match-day staff and club outreach programmes and any other relevant people.</td>
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<td></td>
<td>3.3 Stewards receive regular training on all forms of discrimination and harassment and know how to deal with incidents of discrimination, harassment and abuse inside the stadium.</td>
<td><strong>ES1</strong> Equality Competencies and Training Needs Analysis</td>
</tr>
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</table>
## Requirement

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<thead>
<tr>
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</tr>
</thead>
<tbody>
<tr>
<td>1. Your organisation can demonstrate that it is implementing and reviewing the Equality Action Plan and has collected updated profile data</td>
<td>1.1 The club can demonstrate that it has made progress in the implementation of its Equality Action Plan; the club continues to review the Equality Action Plan to reflect current requirements.</td>
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<tr>
<td></td>
<td>1.2 Undertake regular audits of staff, players, Board, match-day fans and club outreach programmes; analyse the audit findings and identify areas for improvement; produce an equality monitoring report and present it to the Board.</td>
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<td></td>
<td>1.3 As part of the club's Equality Action Plan identify actions which work towards increasing the diversity of your club including members of staff, players, Board, match-day fans and club outreach programmes.</td>
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<td></td>
<td>1.4 The club can demonstrate that it has implemented a rolling programme of equality training for members of staff, players, Board, match-day fans and club outreach programmes. The club continues to review training needs to reflect current requirements.</td>
<td>ES1 Equality Competencies and Training Needs Analysis</td>
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<td></td>
<td>1.5 Produce an annual assessment of the club's equality achievements, encompassing all areas of the club's operations.</td>
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<tr>
<td>2. Your club's strategies, plans, programmes, activities and key policies consider the impact on people who share protected characteristics</td>
<td>2.1 Carry out Equality Impact Assessments on a key strategy or plan, prioritised Human Resources policies and one key area of service delivery e.g. a programme or activity.</td>
<td>ES9 Equality Impact Assessment Template ES13 Equality Impact Assessment Graphic</td>
</tr>
<tr>
<td></td>
<td>2.2 The club has developed a strategic approach to assessing the equality impact of strategies, plans, programmes, activities, and key policies in all areas of the business.</td>
<td>ES3 Steps to Determine an EqIA in a Club</td>
</tr>
<tr>
<td>3. Your club and your stadium are free from incidents of discrimination, abuse and harassment</td>
<td>3.1 Review and update all reporting policies and procedures; review methods of reporting as well as materials that raise awareness of reporting procedures.</td>
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</tr>
<tr>
<td>4. Equality at your club is improved and developed through consultation</td>
<td>4.1 Club has a comprehensive consultation process with key partners, stakeholders and under-represented groups; actions to address issues are incorporated into the Equality Action Plan.</td>
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<td></td>
<td>4.2 Club has an Equality Advisory Group (comprising employees and external specialists) to consider equality at the club and provide specialist expertise.</td>
<td>ES14 Equality Advisory Group Toolkit</td>
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</table>
## Premier League Equality Standard requirements

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<thead>
<tr>
<th>Requirement</th>
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</tr>
</thead>
<tbody>
<tr>
<td>1. Your club has made significant progress towards equality</td>
<td>1.1 Undertake regular audits of staff, players, Board, match-day fans and club outreach programmes; analyse the audit findings and identify areas for improvement; produce an equality monitoring report and present it to the Board; club has a strategic approach to monitoring.</td>
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<td></td>
<td>1.2 Report against the equality objectives set in the Equality Action Plan, review the equality objectives and produce a revised Equality Action Plan covering all areas of the club's operations.</td>
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<td></td>
<td>1.3 The club is clear on the status of each protected characteristic against all areas of the business now and in the future and this gap analysis is regularly updated.</td>
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<tr>
<td></td>
<td>1.4 Produce an annual assessment of the club's equality achievements, encompassing all areas of the club's operations which is presented to the Board.</td>
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<tr>
<td>2. Equality is mainstreamed through the club's strategies, plans, functions, policies and programmes; the club demonstrates leadership throughout all levels of the organisation on equality</td>
<td>2.1 The club has clear, strategic leadership on equality.</td>
<td>ES9</td>
</tr>
<tr>
<td></td>
<td>2.2 Strategies, plans, programmes, activities and key policies in all areas of the business are regularly equality impact assessed by a significant number of staff and outcomes (actions, changes, and amendments) reported to the Board.</td>
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<td></td>
<td>2.3 Equality Impact Assessments are integral to the club's risk management, decision-making and strategic planning and processes.</td>
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<tr>
<td></td>
<td>2.4 Equality objectives are evident in the club's key corporate processes.</td>
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</tbody>
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Evidence submission guide
This additional evidence guidance has been developed to indicate the type of evidence that clubs may submit to their designated Assessor via the PL Portal. It is a guide and is not prescriptive as each club is different. Suitable alternatives can be presented if they meet the requirements and will be judged on their merits.

### Evidence guide  Preliminary Level

#### 1. Board has nominated or appointed the CEO or Board member with responsibility for equality e.g. job description, written into Equality Policy.
- A Lead Officer for the whole club may be appointed to support the CEO with the day-to-day implementation of equality.
- Briefing document, session notes and/or presentations delivered to the Board and senior staff on equality e.g. requirements and benefits of engaging with the PL Equality Standard, legislation, risk assessment and risk to the club from a discrimination case. Briefing can be delivered by internal or external people e.g. CEO, Lead Officer, Kick it Out, Equality Consultants.
- List of attendees at briefings.
- Briefing to be delivered as part of induction for all new staff.

#### 2. A copy of the up-to-date Equality Policy which complies with equality legislation.
- Board minutes demonstrate that the policy was approved.
- Equality Policy is publicised on club website, through social media and via staff briefings.
- Consultation with key staff and relevant partners/organisations when developing the Equality Policy.

#### 3. The Equality Working Group has representation from senior management and has responsibility for ensuring that plan is developed and implemented.
- The Equality Action Plan includes broad equality objectives and specific and achievable targets and is shaped by consultation (e.g. with disabled fans and under-represented groups), and annual audit data, access audit, Human Resources policy audit, communications audit, training needs analysis, local demographics and other useful comparative data.

#### 4. Intranet postings, new starter and induction packs, club website, suppliers’ information, promotional materials, public signing, public statement from Board member/CEO.
- Board minutes/agenda with equality as a standing item.
- Reference within staff and player contracts, codes of conduct, service level agreement and/or contracts.
- Club has a system to show policies have been read by Board and staff.
- Highly visible notices, match-day programme notices/articles, public address announcements and website information; articles/features in local diverse media, correspondence with community groups and/or public signing of Equality Action Plan; use of social media.
- Hold events to promote equality; club links events to national initiatives e.g. International Women’s Day, IDAHO.

#### 2.1 Annual audits conducted to monitor the protected characteristics as identified under the Equality Act 2010.
- All staff, including casual staff, included in audits.
- PL Fans Match-day Survey results used for PL clubs.
- Match-day fans audit conducted through season ticket holders and/or members through ticket renewal applications.
- Findings of the audit collated and presented with a comparison against national and local data (where available) as well as an explanation of how the audit was carried out and when.
- Board minutes, staff briefing notes and correspondence.
- Areas for improvement are clearly identified and included in the Equality Action Plan.

#### 2.2 All job advertisements reflect the commitment as an equal opportunities employer.
- Adverts distributed to as wide an audience as practically possible.
- Job specification/descriptions and the application process does not exclude any groups from applying.
- Staff involved in the recruitment process should have received training on equality in recruitment.
- Application material includes an equality monitoring form and other relevant equality information.

#### 3.1 Written policy and procedures for members of staff, players, Board, match-day staff and club outreach programmes.
- Safety Officer’s briefing notes.
- Monitoring form including number and types of complaints received, and how resolved.

#### 3.2 Evidence may include information on website, induction programme, staff and player handbooks, photographs of perimeter boards, copies of match-day programme notices/articles, public address announcements and website information etc.
- Encourage reporting to the Kick It Out reporting line and app, or club’s own reporting phone line, email and/or text line.
- Any improvements identified through the monitoring are implemented through the Equality Action Plan.

#### 3.3 Training plan which reflects current legislation.
- Training attendance records.
- Stewards training included in the club’s overall training plan.
- Training provided by contracted companies for stewarding.
<table>
<thead>
<tr>
<th>Evidence guide Intermediate Level</th>
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<tbody>
<tr>
<td>1.1 • Current progress report against outcomes including evidence that timescales in plan have been met and rationale if they have not; an up-to-date Equality Action Plan. • Equality Action Plan is reviewed in line with the business plan of the club.</td>
</tr>
<tr>
<td>1.2 • Annual audits conducted to monitor the protected characteristics as identified under the Equality Act 2010. • All staff, including casual staff, included in audits. • PL Fans Match-day Survey results used for PL clubs. • Match-day fans audit done through season ticket holders or members through ticket renewal applications. • Findings of the audit collated and presented with a comparison against national and local data (where available) as well as an explanation of how the audit was carried out and when. • Board minutes, staff briefing notes and correspondence. • Areas for improvement are clearly identified and included in the Equality Action Plan.</td>
</tr>
<tr>
<td>1.3 • Equality Action Plan details how to work towards achieving diversity in your club including staff and Board. • Evidence that the actions have been implemented. • Details of any programmes/projects, e.g. recruitment activity, mentoring, leadership programmes, job shadowing and work experience. • Marketing materials. • Marketing plan with targets. • Days of action. • Schemes to encourage community use of stadium.</td>
</tr>
<tr>
<td>1.4 • The training programme is embedded within the Equality Action Plan. Training can include briefings, face-to-face workshops, seminars, information, presentations etc. • Club has set aside resources for the training programme. • Training information including presentations/session notes. • Training plan is maintained and up-to-date. • Club demonstrates how it keeps up-to-date with emerging issues or tensions that might be reflected in abusive or discriminatory behaviour and what changes it makes to the reporting policy/training content as a result. • Individual training needs are reviewed through the club’s performance review system.</td>
</tr>
<tr>
<td>1.5 • Positively promote the club’s commitment to the Equality Action Plan and achievements in equality.</td>
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<tr>
<td>2.1 • Completed Equality Impact Assessments for a key strategy or plan, prioritised Human Resources policies and one key area of service delivery e.g. a programme or activity.</td>
</tr>
<tr>
<td>2.2 • The club’s strategic approach to Equality Impact Assessments, the priorities, the continuous roll-out and who will conduct them. • The club has a clear, easy-to-follow process for undertaking Equality Impact Assessments, recording and reporting outcomes (actions, changes, and amendments) to the Board.</td>
</tr>
<tr>
<td>3.1 • Policy and complaints process reviewed and details of any amendments made. • Examples of advertising materials. • Monitoring of complaints received.</td>
</tr>
<tr>
<td>4.1 • Consultation process and findings. • Evidence that actions have been incorporated into the Equality Action Plan.</td>
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<tr>
<td>4.2 • Process to recruit Equality Advisory Group members; terms of reference, notes of meetings.</td>
</tr>
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</table>
### Evidence guide Advanced Level

1.1  
- Reports to Board demonstrate significant progress in terms of change in the club's equality profile over time.  
- Annual audits conducted to monitor the protected characteristics as identified under the Equality Act 2010. All staff, including casual staff, included in audits. Findings of the audit collated and presented with a comparison against national and local data (where available) as well as an explanation of how the audit was carried out and when.  
- Club has a strategic approach to equality monitoring which is clearly documented (includes details of a rolling programme of equality monitoring specifying who will be monitored, when, how, what questions are asked, links to Equality Action Plan and how monitoring is reported to Board).

1.2  
- Current progress report against equality objectives and progress on the Equality Action Plan at Intermediate level, future equality objectives and areas of focus identified.  
- Equality Action Plan is reviewed in line with the business plan of the club.

1.3  
- A gap analysis of each protected characteristic against all areas of the business, now and in the future.  
- Gap analysis considers all areas of the business as well as dual characteristics e.g. female Asian or female disabled fans.

1.4  
- Positively promote the club’s commitment to the Equality Action Plan and achievements in equality.  
- Annual assessment of club’s achievements collated and presented to Board.  
- Board minutes (can be redacted).

2.1  
- The role, accountability and responsibilities of the Board and senior management with regard to the strategic lead on equality is clearly defined.  
- Board and senior management lead the setting and monitoring of strategic equality objectives.  
- Senior management proactively drive equality throughout the organisation.

2.2  
- Equality Impact Assessments for strategies, plans, programmes, activities and key policies.  
- The Equality Impact Assessment process is supported by training for staff undertaking them.

2.3  
- The club details how Equality Impact Assessments have been used strategically to inform decision-making and their status and position in the risk management process, strategic plans and planning cycle, policy and programme development. Board members receive training on Equality Impact Assessments so that they are better able to use the information from them to critically challenge the Executive Team on the outcomes of the equality impact assessment.  
- Database which records the outcomes following Equality Impact Assessments.

2.4  
- Details of how equality objectives are evident in the club's key corporate processes:  
  - Mission, vision and values  
  - Business Plan or strategy  
  - Corporate governance structure  
  - Risk management system  
  - Strategic planning process  
  - Marketing and communication strategies  
  - Annual operational plans  
  - Departmental plans  
  - Continuous improvement or high performing organisational processes  
  - People management policies and processes (including job descriptions, recruitment and selection, performance reviews, identifying training needs, learning and development plans, promotion and retention, competency framework).