Grimsby Town Football Club, Foundation and Academy
Equality Policy

Version:	5
Author Name and E-mail:	Vikki Harries vikki@gtfc.co.uk
Co-Author Name and Email	
Approval/Ratification body	CEO
Review Frequency	Every 3 years or when legislation changes
Date Reviewed/ratified:	September 2026
Subsequent Review date:	September 2029

Contents

Introduction 3
Purpose 3
Principles 4
Equality Act 2010 4
Legal requirements 5
Direct Discrimination 5
Indirect Discrimination 5
Harassment 5
Victimisation 5
UK GDPR and Data Protection Act 2018 6
Responsibility 6
Implementation 6
Positive Action 6
Reporting 6
Breach of the policy 7
Positive Action and Training 7
Reporting tools 7
Monitoring 8
APPENDIX 9

“Equality is about being different but treated the same”

“Diversity is about valuing and embracing the differences in people”

Football is for everyone; it belongs to and should be enjoyed by anyone who wants to participate in it, whether as a player, official, staff member, volunteer or spectator. We aim, therefore, to bring people together in a way that supports positive change, makes people feel valued and improves the lives and inclusive experience of our fans and wider community.

Introduction

Grimsby Town Football Club (GTFC) and Grimsby Town Foundation (GTF) aim for a workforce that represents a mix of backgrounds and identities present in our society and reflects the make-up of our end customers.

GTFC and GTF want each employee to feel respected, valued and able to give their best whether they work on a part-time or full-time basis. We are one family, and regardless of your background, it is fundamental to our values that everyone should be made to feel welcome as supporters. We are committed, therefore, to confronting and eradicating any form of discrimination, whether it is of race (including ethnic origin, colour, nationality and national origin), religion or belief, sex, sexual orientation, marital or civil partner status, age, pregnancy or maternity, disability or gender reassignment.

It is the responsibility of all staff at GTFC and GTF to conduct themselves in a way to help the organisation provide equal opportunities in employment, and to help prevent bullying, harassment, victimisation and inappropriate discrimination. We will also seek to work with people and organisations who reflect our equal opportunity values – the people who play, volunteer, attend and engage with our services.

Purpose

This policy’s purpose is to:

- Provide equality, fairness and respect for everyone under GTFC and GTF employment, whether fixed term, part-time or full-time.

- Help prevent discrimination

- Help avoid all forms of inappropriate discrimination whether in relation to pay and benefits, terms and conditions of employment, dealing with grievances and discipline, dismissal, redundancy, leave for parents, requests for flexible working, recruitment and selection for employment, promotion, training or other developmental opportunities.

- Encourage employees to tell GTFC and GTF if they are disabled or become disabled so that appropriate reasonable adjustments and support can be considered, in line with our internal guidance on reasonable adjustment.

This Equality Policy applies to and is fully supported by the Board.

This Equality Policy does not form part of any employee's contract of employment.

Principles

GTFC and GTF is committed 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 (including gender identity and expression)*
• *Marriage and Civil Partnership*
• *Pregnancy and Maternity*
• *Race (including ethnic origin, background, nationality, and national origin)*
• *Religion or Belief*
• *Sexual Orientation*

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

Equality Act 2010

The Equality Act 2010 came into force on 1st October 2010. The purpose of the Act is to simplify discrimination legislation and create a more consistent and effective framework, while at the same time extending discrimination protection.

The Equality Act 2010 makes it unlawful to discriminate directly or indirectly or harass customers or clients because of a protected characteristic in the provision goods and services.

Commitments:

GTFC and GTF will also make reasonable adjustments for disabled staff, players, volunteers and supporters, ensuring accessibility in line with the Equality Act 2010. Positive action initiatives will be applied lawfully to address underrepresentation, for example through targeted outreach, mentoring or recruitment programmes.

GTFC and GTF commit to:

- Create a zero-tolerance working environment free of bullying, harassment, victimisation and inappropriate discrimination promoting dignity and respect for all, where individual differences and the contributions of all staff are recognised and valued. Achieving this is an important aspect of ensuring equal opportunities in employment.
- Inform all appropriate senior staff and all other employees about their rights and responsibilities under this policy.
- Help all staff understand they, as well as GTFC and GTF, can be held liable for acts of harassment, victimisation and/or unlawful discrimination, carried out in connection with their employment, whether against fellow employees, customers, suppliers or the public.
- Take seriously complaints of bullying, harassment, victimisation and inappropriate discrimination and deal with upheld complaints and vexatious or malicious complaints as appropriate.
- Provide opportunities for training, development and progression to all staff, who will be helped and encouraged to develop their full potential, so that their talents can be used to drive the GTFC's and GTF's business objectives.
- Review employment practices and procedures when necessary to ensure fairness and update them and this policy to take account of changes in the law.
- Monitor the make-up of the workforce regarding age, disability, gender reassignment (including identity), marriage, civil partnership, pregnancy, maternity, race (including colour, nationality, and ethnic or national origin), religion or belief, sex (gender) and sexual orientation to assist GTFC and GTF in meeting the aims and commitments set out in this Equality Policy. Such data will be held securely and anonymously and will not be held for longer than is reasonably necessary in accordance with data protection law.

Legal requirements

GTFC and GTF are required by law not to discriminate against its employees and recognises its obligations to comply with UK Equality Act 2010 and associated regulations.

Discrimination can take the following forms:

Direct Discrimination

This means treating someone less favourably than you would treat others in the same circumstances based on one or more of the protected characteristics listed in section 4 of this document. Treatment will still amount to direct discrimination even if it is based on the protected characteristic of a third party with whom the job applicant or employee is associated and not on the job applicant's or employee's own protected characteristic. In addition, it can include cases where it is perceived that a job applicant or an employee has a particular protected characteristic when in fact they do not. GTFC and GTF will take all reasonable steps to eliminate direct discrimination in all aspects of employment. Discriminatory behaviour by supporters, visitors or participants may result in removal from Club premises, suspension of membership, banning orders or referral to relevant authorities.

Indirect Discrimination

Indirect discrimination is treatment that may be equal in the sense that it applies to all job applicants or employees, but which is discriminatory in its effect on, for example, one particular sex or racial group. Indirect discrimination occurs when there is applied to the job applicant or employee a provision, criterion or practice (PCP) which is discriminatory in relation to a protected characteristic of the job applicant or employee.
A PCP is discriminatory in relation to a protected characteristic of the job applicant or employee if:
• it is applied, or would be applied, to persons with whom the job applicant or employee does not share the protected characteristic
• the PCP puts, or would put, persons with whom the job applicant or employee shares the protected characteristic at a particular disadvantage when compared with persons with whom the job applicant or employee does not share it
• it puts, or would put, the job applicant or employee at that disadvantage, and
• it cannot be shown by the Company to be a proportionate means of achieving a legitimate aim.

The Company will take all reasonable steps to eliminate indirect discrimination in all aspects of employment

Harassment

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 acted against GTFC and GTF under relevant legislation or provided information about such discrimination (also known as 'Whistleblowing').
GTFC and GTF is committed to ensuring that its employees, members and volunteers can conduct their activities in an environment that is free from harassment or intimidation.

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

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

UK GDPR and Data Protection Act 2018

When an employee makes a request for their personal data, GTFC and GTF will process any personal data collected in accordance with our data protection policies.
Data collected from the point at which the individual makes the request is held securely and accessed by, and disclosed to, individuals only for the purposes of dealing with the request (Please see the privacy policy).

Responsibility

The Board of Directors and Trustees will receive regular reports regarding equality, diversity and inclusion performance, complaints, trends and compliance with the EFL and FA equality requirements. The CEO and EDI Lead are responsible for operational delivery, supported by all managers. Whistleblowing and grievance routes will remain free from victimisation.

All managers are responsible for implementing this policy within their teams, addressing inappropriate behaviour promptly and promoting an inclusive culture.

The Chief Executive Officer has direct and overall responsibility for the implementation of this 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 intentions of this policy.
- Act as role models for good practice, and to adopt a proactive role in challenging discrimination
- Follow procedures to ensure equal opportunity
- 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 GTFC and GTF 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 CEO, EDI Officer or Kick it Out.

Implementation

A copy of this document will be available to all staff, members, and volunteers of GTFC and GTF.
GTFC and GTF 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.
GTFC and GTF will ensure that its consultants and advisers can demonstrate their commitment to equality principles and practice.

Positive Action

Where GTFC and GTF identifies an issue from disadvantage or imbalance of opportunity that an individual or group with a protected characteristic could face, GTFC and GTF are committed to lawfully using positive action to address it.

Reporting

GTFC and GTF 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 act accordingly.

Breach of the policy

Breaches of this policy may result in disciplinary sanctions up to and including dismissal, termination of contracts, or expulsion from the Club. Any retaliation against someone who raises an equality concern in good faith will itself be treated as a serious disciplinary offence.

GTFC and GTF 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/they who has suffered unfair treatment within the scope of the policy may raise the matter through appropriate 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

Positive Action and Training

Annual EDI refresher training will be mandatory for all staff, trustees, academy members and volunteers. Progress against the FA and EFL EDI Code of Practice will be reported to the Board each season.

GTFC and GTF is committed to equality inclusion and anti-discrimination as part of The Football League's Code of Practice.

GTFC and GTF will commit 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.

Reporting tools

Reports may be made confidentially and where possible, anonymously. The Club will handle all concerns sensitively and in accordance with applicable data protection legislation.

Ways to report to Grimsby Town Football Club:

The club reporting tool found on the club website

Telephone: 07498926776

Or Contact Kick it Out (0800 169 9414) or the Football Association (0800 085 0508)
Via the free Kick it Out app

EDI contact details:

Equality, diversity and inclusion (EDI) lead:
Vikki Harries
Email: safeguarding@gtfc.co.uk

Inclusion Lead:
Jason Land
Email: jason@gtfc.co.uk

Disabled liaison officer (DLO):
Jane Stephenson
Email: jane@gtfc.co.uk

Monitoring

This Equality Policy is accepted by the CEO for GTFC and GTF and will be reviewed and updated, if required, every year, or sooner due to changes in legislation or guidance given because of an incident of National importance.

Signed (CEO): P.Bancroft Date: 31/10/2026
P.Bancroft (Oct 31, 2026 10:40:38 GMT)

Signed (EDI Manager): Vikki Harries Date: 30/10/2026
Vikki Harries (Oct 30, 2026 16:01:24 GMT)

APPENDIX

Key legisation

- Equality Act 2010
- Public Sector Equality Duty (where relevant)
- Human Rights Act 1998
- UK GDPR
- Data Protection Act 2018
- Public Interest Disclosure Act 1998

Recruitment of ex-offenders policy statement

Final Audit Report 2026-10-31

Created:	2026-10-30
By:	Sam Tucker (SamTucker@gtfc.co.uk)
Status:	Signed
Transaction ID:	CBJCHBCAABAAyEuy_15IX-FivX_lOzeUhXPNjoC5AbKE

"Recruitment of ex-offenders policy statement" History

Document created by Sam Tucker (SamTucker@gtfc.co.uk)
2026-10-30 - 3:51:21 PM GMT

Document emailed to Vikki Harries (vikki.harries@gtfc.co.uk) for signature
2026-10-30 - 3:51:25 PM GMT

Document emailed to Polly Bancroft (polly.bancroft@gtfc.co.uk) for signature
2026-10-30 - 3:51:25 PM GMT

Email viewed by Vikki Harries (vikki.harries@gtfc.co.uk)
2026-10-30 - 3:56:48 PM GMT

Document e-signed by Vikki Harries (vikki.harries@gtfc.co.uk)
Signature Date: 2026-10-30 - 4:01:24 PM GMT - Time Source: server - Signature Appearance Selected: TYPE

Email viewed by Polly Bancroft (polly.bancroft@gtfc.co.uk)
2026-10-31 - 10:39:50 AM GMT

Signer Polly Bancroft (polly.bancroft@gtfc.co.uk) entered name at signing as P.Bancroft
2026-10-31 - 10:40:36 AM GMT

Document e-signed by P.Bancroft (polly.bancroft@gtfc.co.uk)
Signature Date: 2026-10-31 - 10:40:38 AM GMT - Time Source: server - Signature Appearance Selected: MOBILE_TYPE

Agreement completed.
2026-10-31 - 10:40:38 AM GMT