

## HEART OF MIDLOTHIAN EQUITY, DIVERSITY & INCLUSION POLICY DOCUMENT

Heart of Midlothian FC is committed to equality of opportunity and celebrates the diversity. It is our aspiration that we should celebrate and reflect the rich diversity of the community who neighbour, support, and take advantage of support services from the Club.

As part of our continuous appraisal of our policies, we feel it is more appropriate to move from an aspiration of equality to one of equity. Accordingly, we are reappraising our approaches, recognising that we need to consider the way in which we provide the resources that different people require to access the club. This will be a long-term programme. To reinforce the direction of travel, we will henceforth refer to Equity, Diversity & Inclusion as the headline for activities.

Achieving our objectives will be a continual journey of reflection, change and measurement; being prepared to hold ourselves up to scrutiny and ensuring that our working practices are reviewed and assessed on a continuous basis with oversight and championing at the highest levels of the organisation.

We commit to an ongoing programme of continuous learning and development and improving our equality and diversity knowledge and practice:

- As a topflight football club with a prominent position in sport and society
- As a community leader with a privileged position of influence and ability to engage traditionally hard to reach groups
- As a provider of entertainment, opportunities to participate and a range of community support services.
- As an employer.

### Our Commitment

Heart of Midlothian FC is fully committed to ensuring equality for all supporters, employees and residents in communities and cohorts served by the Club. We strive to achieve this through the delivery of accessible, fair services, as an employer, contractor of services and as an institution whose reach and influence extends to communities neighbouring the stadium and beyond.

Our commitment extends to all aspects of our operation, making sure that the ways in which we act, we deliver, and contract out do not discriminate against someone because of perceived difference. It also extends to taking an active role as a perceived leader and influencer in the broader communities and cohorts we serve, removing barriers to participation and as far as is feasible, ensuring accessibility for a diverse range of communities.

We achieve this by implementing robust policies. These are shared with supporters via social media and enforced by stewards on a match day. We will, for example, take appropriate action if unlawful discrimination is identified. We consult with a broad range of community groups, such as disability awareness groups via our dedicated Disability Access Officer and actively support and promote community and cultural events, for example those run by our league bodies such as Show Racism the Red Card and Rainbow Laces Day.

We recognise that taking a positive approach to diversity will create a cycle of improvement in our service provision. By demonstrating we value all aspects of the community we are

strengthening it as a whole. As a Club we have taken a firm stance on refusing sponsorship from industries that are damaging to our community such as pay day lenders or gambling companies. This has led to innovative new sponsorship deals which are designed to enhance our ability to benefit the communities that surround the stadium; communities which are characterised by deprivation and inequality of opportunity.

## Our ambition for Hearts

Hearts has a proud history of being a club which serves its community well. We are unique in Scottish football in our refusal to take sponsorship from gambling companies. We are recognised as a force for good in our community providing services both directly and via our charity, Big Hearts to children, families, older people, vulnerable adults and younger people who wish to boost their employability. We make the facilities of the stadium available without charge to Big Hearts and are proud that we have supported them in winning the More Than Football European award.

The Club sits in the heart of Gorgie and Dalry, close to the city centre, but with disproportionately high levels of hardship. We recognise that the areas that surround our stadium suffer some of the highest levels of economic deprivation. neighbours in southwest Edinburgh. As a focal point in the community, we have used and will continue to use the prominence and accessibility of the stadium to deliver a broad range of support services committed to tackle inequality, inequity and poverty. We are committed to using the reach and resources of the Club to promote and provide equal opportunities and as far as possible, equity of provision; ensuring access to services that support a better future, regardless of individuals' background or circumstances.

## Equal Opportunities Policy and Procedures Scope

This policy applies to all Heart of Midlothian Football Club ("Club") staff, including those on temporary contracts, contractors, suppliers or who have been working at the Club through a recruitment agency.

We are embarking on a long-term programme to assess equality policies to review where these can be enhanced to meet aspirations of equity.

This policy supersedes any previous policies prior to its issue date.

## Club Statement - Equal Opportunities

The Club endorses the principle of equality and will strive to ensure that everyone who wishes to be involved in the Club has a genuine and equal opportunity to participate to the full extent of their own ambitions and abilities and can be confident that they will experience an environment where their rights, dignity and individual worth are respected.

## Policy Statement

The Club is an equal opportunities employer and is committed to providing and encouraging equal opportunities for all and to eliminating any forms of discrimination relating to the following:

- age
- disability

- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race
- religion or belief
- sex
- sexual orientation

(together, the “protected characteristics”).

It is our objective as a Club and as a significant institution in our community, that we should be representative of all sections of society. The Club is fully committed to encouraging equality, diversity and inclusion within the workplace by creating working environments free from bullying, harassment, victimisation, and unlawful discrimination and promoting dignity and respect for all.

This commitment includes, but is not limited to:

- having a culture of zero-tolerance on abuse, unlawful discrimination, bullying, harassment and victimisation
- providing timeous and serious responses in dealing with complaints of abuse, unlawful discrimination, bullying, harassment and victimisation seriously
- implementing reasonable adjustments, and provisions to ensure staff do not receive unfavourable treatment and are not put at a disadvantage
  - monitoring recruitment and selection methods
  - training Managers and employees about their rights and responsibilities
  - providing equal opportunities
  - challenging unconscious bias
  - making opportunities available for training, development and career progression to all staff
  - continuous review and updating of policies and procedures to ensure they do not discriminate unlawfully because of any of the protected characteristics
  - monitoring the make-up of the workforce regarding protected characteristics to encourage equality, diversity, and inclusion
  - ensuring all activities promote positive equality, diversity, and inclusion.

All members staff are expected to adhere to this policy and procedure to ensure that there is a climate of positive equal, diverse, and inclusive opportunities.

### Development of Policies and Procedures

The Club will ensure that all policies and procedures are inclusive and are not unfair or unjustifiable to groups with protected characteristics. Policies and Procedures are governed

by the Human Resources and Legal departments. The Club will ensure that redundancy criteria and procedures are fair and objective and are not unlawfully directly or indirectly discriminatory.

The Club will ensure Absence and Wellbeing, Performance Management and Disciplinary Policy and Procedures penalties are applied without unlawful discrimination or unconscious bias.

The Club recognises that unconscious bias occurs when people favour others who look like them and/or share their values (as we receive information all the time from our own experiences and what we read, hear, or see in the media etc) and that everyone has an unconscious bias. The Club recognises the need to proactively mitigate unconscious bias as it can inadvertently influence recruitment, promotion, staff development and recognition leading to less diverse workforce.

Where unconscious bias is against a protected characteristic, it can be unlawfully discriminatory. The Club therefore aims to challenge stereotyping and prejudice openly and to mitigate this by:

- being aware of unconscious bias
- taking time to make decisions and considering issues fully
- justifying decisions based on evidence and recording the reasons for decisions e.g., recruitment and disciplinary outcomes
- encouraging staff to work with diverse groups of people and getting to know them as individuals, such as working within different teams, locations etc.
- focusing on the positive behaviour of people and not the negative stereotypes.
- implementing Policies and Procedures which limit the influence of individual characteristics and preferences.

### Monitoring Activities

To ensure that this policy and procedure is operating effectively, and to identify groups that may be underrepresented or disadvantaged, the Club is reviewing the way it monitors applicants, employees and associated members of the Clubs age, disability, gender reassignment, marriage or civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

Provision of this information will be purely voluntary, and it will not affect an individual. All data will be held in accordance with the Data Protection Policy and Procedure.

### Outreach Activities - Monitoring

As part of the Club's social responsibility, we positively promote staff to engage with the community and participate in outreach activities. We will actively monitor participation and diversity of activities to identify groups that may be underrepresented or disadvantaged.

## Reporting

If anyone suspects or has any concerns around bullying, harassment, victimisation and/or unlawful discrimination at the Club, they may report this to HR, our Safeguarding officer or anonymity is preferred, then a referral can be made via the Club's website.

## Responsibility and Key Contacts

The board of directors has overall responsibility for the effective operation of this policy and for ensuring compliance with equality legislation. Day-to-day operational responsibility has been assigned to the Human Resources Department. All Managers must set an appropriate standard of behaviour, leading by example, and ensuring that those they manage adhere to this Policy and Procedure. James Anderson, Non-Executive Director is designated as nominated Diversity and Inclusion Director and Ann Park, Director of Community & Partnerships is designated as the Club's Diversity & Inclusion Champion.

Managers are given appropriate training on equal opportunities awareness and equal opportunities recruitment and selection best practice.