



BRADFORD CITY FOOTBALL CLUB
EFL CODE OF PRACTICE
FINAL REPORT
2019/20

EXECUTIVE SUMMARY



Bradford City FC is to be congratulated; this is a good submission, which demonstrates constructive self-assessment and leadership commitment to complete the evidence required at a time whereby the Club faces many additional challenges in relation to COVID-19.

The Club have demonstrated commitment to equality work at a senior level of the organisation and this is driven through all sections of the Football Club.

The Club's evidence is reflective of this and meets the criteria for the Code of Practice. It is recommended that Bradford City FC achieve with an area for future development detailed below.

The evidence produced for this submission will provide a solid foundation for continued equality, diversity and inclusion work. Well done.

Mandatory areas which require immediate action to meet the Code of Practice:

1. Not applicable

DECISION AND FEEDBACK

Final Assessment Decision:

Met	Submitted evidence is sufficient to achieve the Code of Practice.	x
Partially Met	Submitted evidence does not fully meet the requirements to achieve the Code of Practice. Action is required on mandatory recommendations before re-submission.	



Not Met

Submitted evidence does not meet and/or is insufficient to meet the requirements of the Code of Practice.
The Club has failed to submit any evidence for the Code of Practice.

Next Assessment deadline (if needed)

Code of Practice Assessment signatures

Name of Club	Bradford City
Name of Lead Officer	Paula Watson
Date submitted	December 2020

Independent Assessor	Vicky Jackson
Assessment date	13/1/21
EFL signatory	Catherine Edmunds



The following report has been produced by Plan4Sport as independent assessors to the EFL for the EFL Code of Practice. The findings in the report are based on the evidence supplied at the time of the assessment being carried out.

Club Name: Bradford City Football Club

Visit 1 date: 11/2/20 Visit COP Assessor Vicky Jackson

Visit 2 date: 17/4/20 Telephone remote assessment COP Assessor Vicky Jackson

Visit 3 – date: 29/9/20 Telephone remote assessment COP Assessor Vicky Jackson

Final Assessment date: 13/1/21

SECTION 1. CODE OF PRACTICE – ASSESSMENT

Section to be completed by Equality Assessor based on the self-assessment template, evidence pack submitted by the Club and through review meetings.

1. Accountability and Commitment		The club's Board, CEO and senior staff are committed and accountable for equality across the business		
ESSENTIAL EVIDENCE	Met	Partially Met	Not Met	Feedback
1.1. The is clear commitment from the board and CEO to equality and discrimination	x			Equality Policy Club Policies Appointed persons leading on E,D and I CCO report Organisational chart documenting key personal leading on E,D and I
1.2. The Board monitors compliance with the Club's Equality Policy and written progress is reported to board annually	x			Equality working group minutes Safeguarding report Statement documenting internal reporting arrangements in relation to E,D and I – Board monitoring



1.3. Equality Champion and Lead Officer identified with role descriptions which reflect equality and anti-discrimination	x		Head of Operations - Lead Inclusion Officer job description SSO job description CEO job description
1.4. Summary of Club's actions to be taken following data collection	x		Equality monitoring complete Report with main findings highlighted Data benchmarked with census information
1.5. The club has terms of reference for an internal inclusion advisory / working group	x		Terms of reference and confirmatory statement
1.6 A log of actions taken by the internal inclusion advisory group (notes or minutes) are submitted	x		Equality, Diversity and Inclusion working group – minutes and log of actions
1.7 Results of the most recent access audit and subsequent remedial actions	x		The Club's latest Access Audit (2016) has been submitted as evidence (paper copy seen). Report submitted documenting a review of the Access Audit findings and remedial actions – confirmation of no changes to the Ground since the audit was undertaken in 2016
1.8 Internal communications from club leadership team and/or CEO/ Lead Officer on the club's commitment to equality, diversity and inclusion and the Clubs Code of Practice work to all staff, Board and players	x		Internal email to staff – update on E,D and I matters; partnership working with key stakeholders, Club initiatives, development of working group, development of policies and procedures, employee handbook
1.9 External communication from club leadership on the importance of equality, diversity and inclusion and the Club's Code of Practice work to fans and other stakeholders	x		Equality statement on website Match day program Ground information Communication to fans re. women's football, sunflower lanyards, Parader Issue 12, transphobia week of action Internal E,D and I communications
DESIRABLE EVIDENCE			
1.1 Copy of the Community Foundation's most recent Capability Code of Practice assessment report	x		
1.2 Copy of the Clubs latest Safeguarding report	x		
1.3 Copy of the latest Safe to Operate report for Academy	x		
1.4 Evidence of an external inclusion advisory group and a log of actions taken by the external inclusion advisory group/ meeting notes from this group			



COMPETENCIES TO BE DEMONSTRATED DURING VISIT BY STAFF AND LEADERS			
1.1 Leaders have an understanding of key trends within the data presented in the Equality Monitoring reports	x		Equality Monitoring complete Good data which reflects analysis and understanding of how this can be used to inform decisions and promote best practice within the Club
1.2 Leaders can articulate tangible examples of how the Club or Community Foundation have looked to encourage community use of the stadium and other club facilities by under-represented groups.	x		As above – external communications Community engagement initiatives
1.3 There is a clear commitment to equality and anti-discrimination at the highest level in the Club	x		Evidence listed under essential documented above
1.4 The Club has nominated a Board Member and the CEO/senior manager to lead on Equality, Inclusion and Anti-discrimination	x		As above
ASSESSOR FEEDBACK AND ASSESSMENT DECISION			
<p>Visit 1: The Club demonstrates good progress in terms of establishing clear internal accountability and commitment relating to E, D and I. Current evidence is reflective of this. Please note the comments above and continue to upload your evidence as discussed ensuring that this is clearly referenced to the criteria.</p>			
<p>Visit 2: Outcome 1 requires the Club’s Board, CEO and senior staff to demonstrate commitment and accountability for equality across the business. Uploaded evidence is reflective of this. We have discussed outstanding actions which are documented above.</p>			
<p>Final Submission: Evidence for Outcome 1 complete.</p>			

2. Reporting and Tackling Discrimination **The club are proactive in tackling all incidents of discrimination on and off the pitch**

ESSENTIAL EVIDENCE	Met	Partially Met	Not Met	Feedback
<p>2.1 The club have a policy or procedure for responding to: *Incidents on match day *Incidents on social media *Incidents within the workplace – key HR policies for this should be in place – Bullying and Harassment, Discipline, Grievance and Whistleblowing</p>	x			<p>Statement on reporting systems Match day staff handbook - stewards Social media policy Induction annual refresher checklist Code of conduct for all staff, match day staff and contractor Hate Crime reporting policy Staff handbook</p>
<p>2.2 The club has submitted content for training provided to stewards, players, Board, staff and others (as appropriate, e.g. Community Trust staff)</p>	x			<p>Training needs analysis uploaded PFI tracker Slide deck – internal equality training for all staff, volunteers and match day staff Ramadan course information Skill matrix</p>
<p>2.3 Examples of equality briefings delivered to steward on match-days are submitted covering the current season</p>	x			<p>Match day staff handbook Operational Order Plymouth Argyle Match day log</p>
<p>2.4 The club develops and submits a log of incidents (both on match day and social media) including detail of the actions taken and the resolutions/ outcomes</p>	x			<p>Match day incident log</p>
<p>2.5 Examples of communications to staff and fans on how to report an incident (both on match day, non-match day and social media)</p>	x			<p>Match day programs Signage around the ground Reporting incident information on website</p>
<p>2.6 The Club co-operates fully with the relevant authorities when dealing with any incidents e.g. FA, Police, EFL, KIO</p>	x			<p>Match day incident log Banning and suspension letters External communication to home and away fans via website/social media</p>

DESIRABLE EVIDENCE			
2.1 The club develops an annual report which analyses the trends in reported incidents and identifies actions to address these next season			Banning and suspension letter – documents decision making process
2.2 The club has a transparent procedure for banning fans which is clearly communicated			
2.3 The club has an education programme for fans which is delivered to fans who have received temporary bans from the club.	2.2		
COMPETENCIES TO BE DEMONSTRATED DURING VISIT BY STAFF AND LEADERS			
2.1 Leaders and staff are comfortable speaking up if they saw a colleague treated in a discriminatory way	x		Policies and processes documented in staff handbook. E,D and I internal communications to staff Reporting of incidents - statement
2.2 Leaders and staff can articulate the process for reporting an incident on: *Match day *Social media *Which occurred in the workplace	x		Supporting evidence – as per essential criteria outcome 2
2.3 Staff can articulate where to go for help and advice around bullying and harassment	x		Staff handbook Reporting of incidents statement E,D and I internal communication to staff
2.4 Staff understand where to find the grievance, whistleblowing, harassment and bullying policies	x		Staff handbook Induction Induction annual refresher
2.5 The Club to demonstrate how they have implemented Crowd Management Measures – FA Good Practice Guide for Football Clubs	x		Match day briefings Incident logs Ground signage External fan information on website – home and away fans Evidence of partnership working with police
ASSESSOR FEEDBACK AND ASSESSMENT DECISION			
Visit 1: Outcome 2 relates to how the Club are proactively tackling all incidents of discrimination both on and off the field. You are aware of actions required, which are reflected in the comments above. Please continue to upload evidence as discussed.			



Visit 2: The Club have made excellent progress towards the evidence required for Outcome 2. Please note the comments above and upload to the portal accordingly.

Final Submission: The evidence requirements for Outcome 2 have been met.

3. Data Capture and Insight The club collects robust data and uses this to inform its actions and activities going forward				
ESSENTIAL EVIDENCE	Met	Partially Met	Not Met	Feedback
3.1 An Equality Monitoring Report covering all staff and board profile data is completed and signed off by the Board prior to being submitted	x			Equality Monitoring complete Over 80% response rate Summary report with key findings and data benchmark
3.2 Actions and next steps are identified within this report as a result of equality monitoring completed for staff and board.	x			As above
DESIRABLE EVIDENCE				



3.1 Equality Monitoring Report covering fans data is completed and submitted. This should include age, sex and disability as a minimum.				
3.2 Actions and next steps are identified as a result of equality monitoring completed for fans and included within the Equality Monitoring Report				
COMPETENCIES TO BE DEMONSTRATED DURING VISIT BY STAFF AND LEADERS				
3.1 Leaders are able to analyse data and make informed decisions	x			Summary of key findings and data benchmark
3.2 The club can demonstrate compliance with GDPR	x			Data privacy policy GDPR online course/ certification
3.3 The club has achieved a statistically significant response rate within all Equality Monitoring reports (80% + for staff and Board)	x			Over 80% response rate
ASSESSOR FEEDBACK AND ASSESSMENT DECISION				
<p>Visit 1: Outcome 3 requires the Club to collect robust data and use this to inform its actions and activities going forward. This process has already commenced, and evidence clearly demonstrates meaningful data analysis. To continue this process, noting the guidance above. Good progress so far.</p>				
<p>Visit 2: The impact of COVID-19 in terms of business disruption is not within the control of the Club, therefore a further data capture exercise is deferred until all staff return to work. There is however a clear plan as to how this will be undertaken and how the data analysis will be presented and benchmarked.</p>				
<p>Final Submission: Outstanding action points have been addressed. Outcome 3 in complete.</p>				
<p>4. Policy and Legal Compliance The club has a robust set of policies and procedures in place to ensure it is legally compliant</p>				
ESSENTIAL EVIDENCE	Met	Partial ly Met	Not Met	Feedback
4.1 The club has an up to date and signed off Equality Policy covering all areas of the business (club and Community Trust/ Foundation)	x			Equality Policy Internal communication to staff email Equality action plan
4.2 The club has a set of up to date and signed off family friendly policies – adoption, maternity, paternity, parental, shared parental leave, flexible working	x			Evidence uploaded
4.3 An up to date Recruitment and Selection Policy is in place	x			Evidence uploaded
4.4 An up to date Whistleblowing Policy is in place	x			Evidence uploaded



4.5 An up to date Grievance Policy is in place	x	Evidence uploaded
4.6 An up to date Bullying and Harassment Policy is in place	x	Evidence uploaded
4.7 An up to date Disciplinary Policy is in place	x	Evidence uploaded
4.8 An up to date Volunteer Policy is in place (if applicable)	x	Evidence uploaded
4.9 The club accesses legal advice on equality, diversity and inclusion	x	Confirmatory statement detailing how the Club accesses appropriate legal advice in relation to E,D and I matters.
4.10 Staff Induction materials include equality and diversity, the club's Policy and expectations of behaviour	x	Code of conduct for staff match day and contractors Induction Staff handbook Annual update
4.11 The club has submitted a gender pay gap report (if applicable) Mandatory gender pay gap reporting	No mandatory action required	If your organisation has fewer than 250 employees, it can publish and report voluntarily but is not obliged to do so. https://www.gov.uk/guidance/gender-pay-gap-reporting-overview Bradford City FC are not required to submit due to employee numbers falling below the reporting threshold.
4.12 The club has submitted a Modern slavery report (if applicable)	x	Club Modern Slavery statement issued (not required to submit)
4.13 The club has Codes of Conduct or job descriptions which set out their expectations of behaviours for; *Players *Coaches *Staff *Match day guests *Casual staff, which includes stewards *Contractors	x	Job descriptions uploaded Professional players code of conduct Supporters code of conduct DC Coaches code of conduct Volunteer policy Modern slavery policy – for contractors
4.14 The club provides copies of a range of job descriptions which set out the club's expectations of equality within the role. This should include the CEO and Lead Officer.	x	Range of job descriptions uploaded
4.15 The club has submitted an outline of the performance appraisal process which includes equality	x	Appraisal policy, process and supplementary recording forms submitted



4.16 The club has a Mental Health and Wellbeing Policy in place	x		Mental health plan uploaded
4.17 The club has a risk register which includes equality	x		Corporate risk register uploaded – includes E,D and I



DESIRABLE EVIDENCE			
4.1 The club has developed and submitted a Mental Health and Wellbeing Strategy			
COMPETENCIES TO BE DEMONSTRATED DURING VISIT BY STAFF AND LEADERS			
LEADERS DEMONSTRATE:	Met	Partially Met	Not Met
4.1 Understand the requirements of the Equality Act 2010 and how they impact the club	x		Terms of reference/ working group Policies and procedures Equality Monitoring report
4.2 Have considered actions to increase the diversity of their Board and senior staff team. These are included in the club's Equality Monitoring Report	x		Equality Monitoring report key findings
4.3 Can demonstrate that they both champion and deliver on equality, diversity and inclusion initiatives	x		E, D and I working group Equality action plan Equality policy Internal staff communications External fan and stakeholder communication Designated matches
4.4 All staff including leaders are aware of the Equality Policy	x		Internal staff communication Staff handbook Induction/annual refresher
4.5 Are aware of where to look to understand their entitlement under family policies	x		Staff handbook
4.6 Are aware of the Clubs commitment to equality, diversity and inclusion and its Code of Practice work	x		E,D and I working group Designated leaders Internal email communication
4.7 Can recall specific equality training they have undertaken since reassessment and can give examples of how it has changed their working practice	x		A review of policies and procedures in relation to E,D and I Development and implementation of the E, D and I working groups External and internal communications of what E,D and I arrangements are in place; designated matches, community initiatives;

CLUB DEMONSTRATES:			
4.1 Has a process in place for ensuring that policies are kept in line with changing legislation (and that staff are kept up to date on these changes)	x		Policy index and review schedule
4.2 Has incorporated Inclusion and anti-discrimination into a Corporate Risk Register	x		This is documented as a headline within the corporate risk register.
4.3 Communicates its commitment to E,D&I to prospective employees within job advertisements and descriptions	x		Job advert Club website
4.4 Includes inclusion and anti-discrimination behaviours as a tangible part of any performance appraisal process	x		Appraisal process and associated documents uploaded
4.5 Has a process in place for ensuring that all fans, both home and away, subscribe to ground regulations. This includes signage and ticketing terms and conditions	x		Ground signage Ticketing information Match day program Home and away fan information via website
4.6 Has a process in place for risk assessing contractors around their approach to equality and Modern Slavery through the club's procurement process (where reasonable and proportionate to do so)			The Club reported having a modern slavery policy - uploaded
4.7 Can demonstrate examples of matches which have been dedicated to equality initiatives in the season	x		The Club has matches dedicated to equality initiatives e.g. Rainbow laces – evidence uploaded
4.8 Can demonstrate (where appropriate) examples of policies and/or communications which have been tailored to diverse groups	x		Internal and external communications Community engagement initiative examples uploaded Staff handbook
ASSESSOR FEEDBACK AND ASSESSMENT DECISION			
Visit 1: Outcome 4 requires the club to demonstrate that it has a robust set of policies and procedures in place to ensure it is legally compliant. We have highlighted action points required and this is reflected in the comments above. To continue to upload your evidence.			
Visit 2: The Club have made significant progress with their submission for Outcome 4. Well done. Please note the comments above and upload to the portal accordingly.			
Final Submission: Outstanding action points have been addressed. Outcome 4 is now complete.			

5. Education and Training The club ensure that all staff, Board and players have completed relevant training to support their roles



ESSENTIAL EVIDENCE	Met	Partially Met	Not Met	Feedback
5.1 A log of completed attendees - Playing for Inclusion training – The Club ensures that ALL employees, Board and Community Trust staff attend the Playing for Inclusion workshop or complete the on-line course. Training should be repeated every three years.	x			Playing for Inclusion training register and statement.
5.2 The club ensures that senior stewards have undertaken the PFI workshop or on-line course and that equality training has been delivered to all match day staff	x			Steward training record uploaded
5.3 The club has provided evidence of incident management training for relevant staff which includes; * social media training * stewards training * Counter terrorism ACT training	x			Submitted evidence to reflect that all relevant staff have attended social media training, stewards training and counter terrorism Steward training register, ACT, safeguarding and equality Evidence of social media training within annual induction Training matrix and training schedule
5.4 The club has submitted a signed Playing for Inclusion training register for all face to face delivery	x			N/A online PFI registers uploaded
5.5 The club provides evidence of a broader suite of equality training being offered to all staff – club, community and academy going forward in the form of a Plan or Training Needs Analysis	x			Internal staff equality training program – slide content Training matrix/needs analysis Employee training process
5.6 The club has delivered mental health awareness training to senior staff across the business	x			MIND awareness training beginning of Feb 2020 – attended by senior staff
5.7 The club has provided the content and attendance records of/for all equality training delivered since the last assessment	x			Playing for inclusion training register updated
5.8 The club provides evidence that all players and playing staff receive regular equality training and briefings with regards to inclusion and anti-discrimination. This includes social media guidelines and learning and development opportunities are provided in partnership with LFE, the PFA and LMA.	x			Academy via lifestyle program Work with player liaison LFE PFA, KIO for relevant training. Liaise with CE EFL to confirm training.
DESIRABLE EVIDENCE				



5.1 The club has developed a link with an education provider to access additional equality training				
5.2 The club has delivered Mental Health training to all staff and stewards across the club, Community Trust and Academy				
5.3 The club has delivered autism and dementia awareness training to customer facing staff.				
COMPETENCIES TO BE DEMONSTRATED DURING VISIT BY STAFF AND LEADERS				
5.1 Leaders and staff can demonstrate how they have used their learning from the equality training in their day to day role.	x			Establishment of an Internal Inclusion advisory group leading the way in E,D, and I Meeting minutes Equality action plan Terms of reference
5.2 The club can demonstrate staff training has taken place across the club, community and academy on equality.	x			See comments above
5.3 The Club ensures that the Board and staff (paid and unpaid) understand the principles of inclusion and anti-discrimination and receive annual updates and briefings.	x			Staff induction Annual updates Staff internal communication Feedback from E,D and I working group and lead personal
5.4 Specific guidance is provided to staff on a regular basis with regards to the Club's commitment on inclusion and anti-discrimination.	x			Handbook Email communications Annual updates To upload supporting evidence
ASSESSOR FEEDBACK & ASSESSMENT DECISION				
Visit 1: Outcome 5 requires the Club to demonstrate how they ensure that all staff, Board and players have completed relevant training to support their roles. You have identified several actions required and this is reflective in the comments above. Please upload your evidence accordingly.				
Visit 2: Please see comments above. Good progress to date; continue to upload your evidence accordingly.				
Final Submission: Outstanding action points have been addressed. Outcome 5 is now complete.				

