



# Football in pursuit of Equality (E), Inclusion (I) and Cohesion. (C)

A BRIEF OVERVIEW OF FOOTBALL'S EIC INITIATIVES,  
ACHIEVEMENTS AND SHORTCOMINGS 1993-2017, WITH AN  
OUTLINE OF THE CHALLENGES AHEAD.



## INTRODUCTION

1. August 2018 marks the 25<sup>th</sup> year of Kick It Out. Formed in 1993 as 'Let's Kick Racism Out of Football', it was a time of racial violence, harassment and abuse was rife in the game, but the authorities were in denial. Since then, Kick It Out, has campaigned across the game to raise awareness about inequalities and exclusion and set an evolving agenda for action to enable the authorities, leagues, clubs, players, match officials and fans to tackle these issues.
2. Today, after 24 years, the climate and atmosphere for playing, watching, officiating and being active in the sport is a much safer and enjoyable experience than in 1993. But, there are many challenges ahead and serious deficiencies and short comings still to be addressed.
3. Perhaps the biggest challenge for football in England is to establish and achieve a coherent responsible leadership, to take the equality and inclusion agenda forward with the dynamism necessary to generate trust and confidence. The leaders in The FA, the leagues and across all of the clubs and relevant bodies, have a substantial part to play in helping to inspire and retain the trust and confidence of players, fans and the wider public on this agenda. Football is an important part of many people's lives. The past two and half decades have brought about on-field improvements but many off-field inequalities remain to be tackled. As the demography of Britain changes, football is having to respond to meet the challenges of its diverse population in more coherent and comprehensive ways and it must understand better the benefits accruing from good equality practices and the promotion of good community cohesion through its activities with diverse communities.
4. Much effort and resources have been invested by the football authorities and professional clubs to give effect to policies, practices, processes and regulations designed to eliminate unacceptable conduct and discrimination. However, what has been most lacking, is the consistency of approach, coherence across all agencies, effective shared communication, public accountability and leadership throughout the authorities and clubs that understand these issues and prepared to meet the challenges responsibly.

## ACHIEVEMENTS OF FOOTBALL IN TACKLING DISCRIMINATION AND EXCLUSION

5. Success stories over the last 25 years include: -
  - The development of appropriate regulatory frameworks for both Premier League (PL) and English Football League (EFL) clubs, to support inclusivity and deal with aspects of abusive and discriminatory activity across all areas of the club.
  - Improved effective reporting and investigating of complaints of abuse both on and off field, increasing confidence to report discriminatory and abusive incidents.
  - On pitch visibility of diversity reflected in the wide ranging background of players.
  - Investment in equality and anti-discrimination training and education of players and administrators in the game, through programmes such as Equality Inspires, Life skills, Playing for Inclusion, PFA senior professionals' training and LMA staff.
  - Creating greater opportunities for those underrepresented in football to be recruited to football's workforce through the Raise Your Game programme.



- Greater awareness of equality and inclusion each season through dedicated games, events and activities across the professional game and non-league.
- Equality ambassadors involved in education and awareness raising and promoting equality and diversity among fellow players and in schools and junior clubs.
- Targeted campaigns and education programmes to tackle prejudice and hate.
- Club Community programmes attracting increased participation among young people and offered equality related activities.
- Opening opportunities to increase diversity among qualified coaches within the game:
  - ❖ The Elite Coaching Apprenticeship Scheme (ECAS) with the Premier League
  - ❖ The COACH Bursary scheme administered by The FA
- Development of leadership programmes to diversify senior positions within the game:
  - ❖ The Women Leadership Programme with The FA
  - ❖ The On Board Programme with the PFA/FA
- The delivery of The EFL Voluntary code for the recruitment of BAME managers.
- Increased engagement with supporters, particularly those underrepresented at games, through the Fans for Diversity programme, a partnership between Kick It Out and the Football Supporters Federation (FSF).
- Increasing the awareness of diversity through the County FA's and grassroots football through education and events.
- Support for the education of professional managers and coaches on equality, inclusion and diversity.
- Development of educational resources for stewards and safety officers.
- Enhanced processes to accommodate the rise of incidents reported of football related discrimination on social media.
- Some significant commitments from clubs to meet obligations in the Accessible Stadia Guidance so that Disabled fans can get access to adequate seating, all facilities and services.

## **ON-GOING CONCERNS TO BE ADDRESSED**

6. There has been, and continues to be, extensive attention given to the on-field activities of the game due to its high visibility and the requirement to eliminate all aspects of unacceptable and disreputable abuse and misconduct. At the top end of the professional game there has been considerable progress but there remains continuing concerns to be addressed, especially amongst grassroots football.
7. However, while visible improvements in the management of the on field activities are part of the ongoing day to day experience, less attention has been accorded to the management and administrative culture of the game, leaving it exposed to claims of institutional discrimination and exclusion. It is this area that is now the focus of urgent attention for action. What that action should be, how it is determined and implemented and the recognition that it is all intended to bring benefits to the game underpins the purpose and content of this report.



## **LEADERSHIP, COMMUNICATION AND COHERENCE**

8. Implementing change requires accurate information for monitoring and managing policies, programmes and practices, as well as to dispel inaccuracies, misinformation, false claims and wrongful perceptions. Linked to the inadequacy of shared and available key diversity and equality data, there is an evident incoherence around communication between the different football bodies on equality initiatives due to the historical tendencies to silo-type operations. Football should be promoting equality and inclusion across the whole game, with responsible leadership being given by all football bodies in a coherent way. Such leadership must come from the Boardroom and senior executives and there must be both organisational and corporate accountability with access for public scrutiny.
9. There is a paucity of shared available data which undermines knowledge about underrepresentation, disproportionality, exclusion and accountability. Without coherent and meaningful data being available to set baselines, progress cannot be managed or monitored. Information management is an essential part of best management practices. These shortcomings apply to all sections of football, including the authorities, the leagues and the clubs. This is readily acknowledged and accepted and discussions are taking place to share information, especially in the areas of coaching and off-field areas. It is expected that key data will be shared meaningfully in future, while safeguarding confidential and private information from disclosure.
10. It is essential for the game as a whole to be better informed as it responds to the equality and inclusion challenges, in a coherent way and not be fearful of change. Football will also need to manage the sharing of the data publically to ensure that, in being accountable, it does not attract unfair or inaccurate criticism but retains the integrity of being open, objective and accountable in pursuit of equality, inclusion and cohesion. The question is who will lead this? Strong leadership is required to ensure that the necessary relevant information is collected, collated, is rigorous and utilised to enhance effective management and measuring progress against the equality, inclusion and cohesion goals. Obviously, there would be safeguards for confidential and commercially sensitive information

## **Recruitment**

11. Even without relevant data being available or shared, it is clear that there are policies and practices in place that contribute to excluding employment opportunities to people from different backgrounds. This is particularly so in coaching and team management but even more so in administrative and senior management positions in clubs and authorities including the leagues.
12. Consideration must be given to addressing Off Field recruitment, retention and under representation. Equality employment data, where available, should be shared so that there can be better understanding about what is happening, where good practice exists and is missing, what progress is being made, learning from best practices and dealing with facts as

opposed to perceptions and anecdotes. To accord with best employment practices that provide equality of access for all backgrounds, football must seek urgently to:

- Open all appointments/vacancies, (unless there are exceptional justifiable circumstances) and recruit widely with the objective of appointing from a range of diverse candidates, to tackle under-representation and disproportionality.
- Develop positive action programmes to include secondments, mentoring, shadowing, and paid work placements.
- Establish staff networks to enable support and development for progression.
- Collect and maintain anonymous equality staff data for monitoring and sharing, within agreed limits, inside football, to understand and address under-representation and disproportionality.
- Deliver monitoring training to club staff to enable them to promote data collection with confidence and competence as well as training to ensure that all those involved in recruitment fully understand what non-discriminatory recruitment is, how it can be achieved and why all recruitment should target candidates from all backgrounds. Shortlists should comprise a diverse range of candidates and final decisions, based on merit, must be able to stand up to objective scrutiny.
- Evaluate and disseminate data collected from programmes such as On Board, Women Leadership and EFL Recruitment Code for BAME managers, to demonstrate success stories and any relevant learning shared (E.G. On Board -76 graduates since 2013 from which 39 have Board positions on CFAs and other third sector organisations)
- Appointment panels should have diverse members, including BAME personnel, Women and Disabled persons. Where recruitment consultants are used they must be instructed to bring forward only short lists of diverse appointable candidates, otherwise there will be a familiar inevitable outcome, leading to no change to the personnel profile of the organisation.

## **WHISTLE BLOWING AND INTEGRITY MANAGEMENT**

13. The lack of clear policies and practices to enable staff and observers to challenge wrong doing and unacceptable conduct impacts negatively on the integrity within football to be open, objective, accessible and fair in its dealing with complaints and grievances.

All parts of the game must establish effective independent whistle blowing arrangements to enable the reporting of matters of discrimination, abuse, harassment, bullying and mismanagement without the fear of victimisation. This should be made widely known and accessible to all staff.

The FA is developing new whistle blowing policy with UK Sport, which is anticipated to be implemented in early 2018.

## **Procurement and Contract Compliance**

14. Football engages with sponsors and contractors extensively. There are no known formal processes for assessing contractors, suppliers and sponsors' policies and practices and track record on equality, inclusion and cohesion. In accordance with best practice guidelines,



football should always, in advance of procurement, ensure that all contractors, suppliers and sponsors are effectively engaged in equality and inclusion policies and practices, and in compliance with all legal requirements in their operations with regard to all aspects of unlawful discrimination, with a commitment to having diverse workforces. Incorporating equality clauses in all contracts should be a minimum requirement with a requirement for this to be monitored. The football authorities, leagues and clubs believe that they operate within existing legislation in such matters. The Premier League Equality Standard and other football regulations specify relevant requirements. Nevertheless, there should be a thorough review to ensure that compliance is effectively enforced and that the outcomes of promoting equality, inclusion and cohesion are achieved.

### **Club Community Programmes**

15. Community programmes have diversity at the heart of their work. The rapid expansion of the PL's Primary Schools Reading Stars programme has created substantial opportunities to use football and the club badge to promote equality and inclusion of others. The PL and the EFL are looking to expand the scope of these programmes. It is essential that these programmes have equality and inclusion objectives as core objectives and monitoring of impact as a key factor. The community programmes of all 92 clubs are essential in bringing communities and individuals from all backgrounds together. The attraction and power of football make the clubs programme progress substantially one of the most important contributions that football brings to community cohesion and it requires more investment as well as the evaluation of the Equality, Inclusion and Cohesion outcomes and cohesion benefits.

### **Stewards Training**

16. Inconsistency of stewards training has been recognised by both leagues and The FA with regard to tackling discrimination. Discussions are already underway between The PL, EFL and the FA as this is regarded as a high priority. The launch of the stewards' guide to 'Tackling Homophobia, Biphobia and Transphobia' last season was well received by the clubs showing that there is an appetite toward further education.
17. There needs to be a review of all training, leading to the development of relevant and consistent training to ensure that stewards are knowledgeable about equality and discrimination and feel empowered to act upon it appropriately, with senior stewards and Safety Officers as a priority. An additional benefit from this training programme would be to enhance the career prospects of those stewards trained.
18. Kick It Out will contribute to the scoping document, in partnership with the Football Supporters Federation and The FA, together with Safety Officer Representation, to focus on what training is needed and deliverable and to consider the different levels of training required and the enhancement needed for career progression and professional recognition. Recently, some very serious publicly reported incidents point, worryingly, to a return to abuse and violence, reflecting a rise in reported and under reported hate crimes in wider society.

### **Reporting**

19. The reporting of incidents of abuse and misconduct continues to increase. There is an acknowledgement from the police and agencies that there is general under reporting of hate related incidents and crimes and apparently significant under reporting with regard to homophobia, anti-Muslim hate crime and sexism. This is particularly apparent at grassroots level.

Increased promotion of the reporting mechanisms is a crucial element of all of this work, including the Kick It Out reporting app, whilst also improving the user experience and confidence in reporting is paramount.

20. The current education and rehabilitation programme being delivered by Kick It Out in request to clubs and local police forces, could be further developed to allow for greater awareness and buy-in, especially for first time offenders or young fans. Prolific and persistent offenders still need to be punished accordingly and be appropriately sanctioned.
21. The various reporting systems supported by The FA and the leagues are being reviewed to improve their capability and visibility. It is essential to move towards a better coordinated set of reporting methods. The police, CPS, social media providers and courts all have a vital role in dealing effectively with aggravated abuse incidents and football must also give higher priority to continuous education for fans and participants on equality, inclusion and cohesion. All professional and grassroots clubs must intensify and display notices of acceptable/unacceptable conduct and the consequences, as well as promoting all preventive type activities.

#### **Further development of Fans for Diversity Programme**

22. The success of Fans for Diversity has shown that there is a real appetite to diversify clubs' fans bases. This programme could be further developed to demonstrate how diverse football fan bases are becoming.

The level of funding and support of the continued development of the Fans for Diversity programme, in association with the FSF, should be considered for review. Discussion are ongoing with The FA to extend the programme from the National League down to Step Six.

#### **Equality Standard**

23. The Premier League Equality Standard (PLES) has been a requirement for Premier League clubs from July of 2015. This framework evolved from Kick It Out's original Equality Standard, and its predecessor Kick It Out's Racial Equality Standard and which operated on a voluntary basis with professional clubs since 2004.
24. The PLES is directly administered by the Premier League, with clubs being supported by Kick It Out throughout the process to meet the range of specified good practice requirements. Evidence is considered by a pool of assessors, who report to the panel of specialists in equality and to achieve consistent assessment for all clubs, and also for consistency among the panel in assessing the submissions from each club.

25. Consistent monitoring data within each club is paramount, to be able to demonstrate the impact of the club's equality and inclusion programmes and which would enable its measurement and management.
26. The Equality Standard, with any accompanying explanatory notes will become a permanent feature on the PL website. Ideally the PLES should ultimately become the quality and equality charter for best management practices across all professional clubs and leagues. The PL will be reviewing the PLES in the first half of 2018 (Reporting in June 2018) and it represents the best vehicle for greater harmonisation of practice, data collection and presentation, coherent recruitment and retention practices, grievance and disciplinary procedures and action for community cohesion through community programmes incorporating equality, inclusion and cohesion education.

#### **DIVERSE AND INCLUSIVE COACHING PATHWAYS**

27. At the end of October 2017 there are only five BAME managers out of the 92 in the PL and EFL. They are Keith Curle, Jimmy Floyd Hasselbaink, Chris Hughton, Jack Lester and Nuno Espirito Santo. Although football has tried to address the under-representation of BAME managers and coaches, through the ECAS programme led by the PL, the Voluntary Code led by the EFL and COACH programme led by The FA, there still is significant work to do. The small number of managers, plus the patchy information across football about qualified BAME and women coaches demonstrates how little has been achieved even though much talking, promises and effort have been invested. Action is now being taken to remedy the lack of analytic information in this area. The FA is to provide data on the number of BAME coaches qualified and the attrition rate through the pathway.
28. The Raise Your Game coaching workshops, funded by the Premier League have offered a number of young BAME and women coaches the opportunities to observe and engage with professional academies but there are only two held per year with a maximum of 30 people at each event. Football must consider identifying coaches from diverse backgrounds and promote such skilled grassroots coaches to work as community coaches within clubs and then to graduate into academies' coaches. The PL and KIO will collaborate to co-ordinate this programme and utilise the networks available to KIO.
29. The cost of qualifications is a significant factor to consider. The standard cost of a UEFA B licence, which is a prerequisite to work in an academy, is between £550 - £600. The standard cost of UEFA A licence is £3,290 in England. This factor cannot be discounted in any review and especially when compared to the cost of qualifications in other countries. The PL is committed to ensure that BAME and Women coaches are properly represented in any programme to upskill the workforce. All academies receive funding via the EPP Youth Grant Fund. There is a need to understand how the clubs utilise this fund to pay and upskill coaches through their qualifications, how it contributes to funding qualifications for their coaches and how it contributes to increasing the proportion of qualified BAME and Women coaches.



30. The ECAS programme developed by the PL should be reviewed and further developed. Seventeen BAME/Female coaches have been involved in ECAS over the last four to five seasons. They are all employed by the clubs and the Premier League pay half of their salary over a four-year period as well as offering various mentors and support.
31. The Football Association, Premier League, Football League, Professional Footballers' Association (PFA) and League Managers Association (LMA) funded COACH for three years from June 2012. This provided a bursary 'pot' of £240,000 over the three seasons, for Youth Award Modules, UEFA B and UEFA A qualifications.

Successful applicants had to hold a minimum Level 2 coaching qualification, demonstrate they were aspiring to higher levels of coaching, could commit to a programme of work for a season and make a contribution to their bursary costs.

Key outputs from the COACH bursary programme are:

- 494 applicants, with 23% Asian, 3% female, 5% self-declared as Lesbian, Gay, Bisexual, Transgender (LGBT) and applicants were predominantly non-disabled and those who declared a faith were mainly Christian or Muslim.
- 168 coaches were accepted with 30% Asian, 70% black; 5% female and 95% male • 227 bursaries were granted with the following breakdown:
  - o 133 Youth Awards
  - o 66 UEFA B
  - o 26 UEFA A
- 67% coaches were placed in one of 40 Premier League, Football League or Women's Super League Academies or Centres of Excellence • 54% of the Asian coaches, 58% of the black coaches and 67% of the female coaches experienced a placement opportunity.
- By the end of the programme, 18 coaches had successfully gained roles (one full time and 17 part time). Eight of these roles are in the Premier League, seven in the Football League and two in Women's Super League Academies or Centres of Excellence.
- 76% of those gaining employment are black, 24% Asian. 15 male and three female.
- 8% of the coaches on the programme were former professional club scholars. Three of them are amongst the coaches who gained employment.

At the end of COACH's agreed time frame, The FA implemented its own bursaries programme which provides bursaries for 100 BAME and 100 female UEFA A and B qualifications every year.

In addition to this The FA also supports the Player to Coach Programme; has two full time BAME placements in our national coach's programmes; and a male and female BAME mentee programme at SGP.

32. With at least 70% of young academy players (ranged from 18-23yrs) released each year could this be an untapped resource to further then progress onto coaching or education programmes?
33. The LMA actively works with the Premier League's Institute for Professional Coaching (IPC), the body comprising of the Premier League, The FA, English Football League, PFA, and LMA, which is focused on developing home grown players and world leading youth coaching.

34. It also actively supports the IPC's BAME programmes through visibility in and engagement with its membership and the membership of the PFCA (the Professional Football Coaches Association). It also provides a programme of training and development for the IPC's mentors with a specific focus on career development and actively supports the IPC's BAME and Women's coaching pilot recruitment programme (ECAS).
35. The FA has indicated that it is actively considering how best to deal with the under representation of BAME and women coaches in the sixteen national teams and the eight disability teams and has opened dialogue with the PFA about the numbers of qualified BAME and women coaches who could make the grade and who would benefit from achieving enhanced qualifications and experience in working with elite international players. This initiative will have to be introduced within a co-ordinated manner, involving all the other bodies involved in coach development and recruitment.
36. The EFL introduced a voluntary code with a mandatory element for the appointment of academy coaches for the 2016/17 season and achieved notable but limited success. The extension of the code will now be supported by all 72 clubs in the EFL and sanctions for non-compliance will be applied to avoid disappointing outcomes it may well be found wanting again when monitored at the end of the 17/18 season. The EFL will monitor the processes and collate information and the data from this should be shared within football to absorb and adopt good and best practices.
37. There is a pressing need to achieve co-ordination across the different agencies involved in the coaching pathways. Particular attention needs to be paid to the recruitment processes at each stage and to the support and guidance given to coaches from underrepresented groups. The FA, PL, EFL and PFA need to come together to reach a common understanding of what needs to be done. This would involve measures such as:
- Data collection and sharing.
  - Mentoring and networking programmes to widen the range of candidates to be identified and supported. The PL should introduce a support programme for BAME and Women coaches, similar to its existing mentoring programmes for PL's ECAS and EHOc programmes.
  - Support for the recruitment guide being developed by the EFL and The FA to achieve transparent recruitment process for academy staff appointments and provide guidance to senior academy management.
  - Initiating open and accessible and accountable recruitment.
  - Increasing financial resources for Kick It Out's Raise Your Game programme.
  - Evaluating the adverse effect and impact of cost associated with courses.

### **Monitoring progress and evaluation**

38. The FA, PL, EFL, PFA and LMA (and any other appropriate stakeholders) should come together to establish a co-ordinating body which would fix timelines for achieving implementation of actions and making arrangements for sharing of monitoring information and the evaluation



of outcomes. In the event of this either being impractical or unacceptable, Kick It Out would determine and implement an arrangement to oversee the development and implementation of the EIC Action Plans and for the corporate consideration of progress at five monthly periods. There would also be an annual standing conference for all concerned to give a public account of football's progress and achievements regarding EIC.

