

Racial Equality in Football

A survey

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**COMMISSION FOR
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Contents

Introduction	4
Background	4
Methodology	5
1. Professional clubs and county football associations	6
Professional clubs	6
FA Premier League	8
Division One	13
Division Two	15
Division Three	18
County football associations	21
2. National football organisations	24
The Football Association	24
The FA Premier League	27
The Football League	29
The Professional Footballers' Association	32
The Football Foundation	34

3. Conclusions	37
The football industry	37
National football organisations	39
Professional clubs	39
Business culture	40
Regional variations	41
County associations and grassroots football	42
Summary	42
Appendices	
1. The questionnaire for clubs	43
2. Population of England and Wales, by region and ethnic group	49
3. Bibliography	50

Introduction

The Commission for Racial Equality (CRE) commissioned this report from the Carnegie National Sports Development Centre at Leeds Metropolitan University. It is an analysis of responses to questionnaires on racial equality in football, which the CRE sent out at the end of 2003 to the 92 professional football clubs and 45 county football associations in England, as well as to various national football organisations. The aim was ‘to generate findings that will help the CRE to determine its next steps’.

Background

The CRE has been increasingly concerned about the apparent lack of representation of people from ethnic minorities in the non-playing side of football – that is, on boards, in coaching and in other aspects of the administration and management of the game. These concerns have been borne out by the available research, particularly the findings of the Sir Norman Chester Centre for Football Research (Bradbury, 2002) that less than 1% of off-pitch staff at professional football clubs were from ethnic minorities. This is mirrored in the under-representation of people from ethnic minorities among spectators of professional football (they make up around 2% of all spectators, FAPL 2003), the continuing racism on the terraces (IFC, 2003), the tension between anti-racist statements and the culture of football supporters (Back et al, 1996), the absence of British Asians in the professional game (FA, 2002) and the failure, at various levels, to encourage young British Asians into the professional game (Bains and Johal, 1998 and Johal, 2001).

The CRE has statutory duties to eliminate unlawful racial discrimination and to promote equality of opportunity and good relations between people from different racial groups. Its powers to meet these duties include the power under section 48 of the Race Relations Act 1976 to conduct formal investigations.

The CRE has a long history of work in promoting racial equality and tackling racism in sport. It was instrumental in setting up *Kick It Out*, the anti-racism campaign in football funded by the game’s governing bodies, and commissioning research into racism in rugby league and cricket. Most recently, in partnership with Sport England, the CRE set up Sporting Equals, a project to promote racial equality in sport through a Standard for Achieving Racial Equality in Sport. Sporting Equals has worked directly with the Football Association, the Football Foundation and the Professional Footballers’ Association, as well as with the governing bodies of most other sports.

In November 2003, the CRE circulated a questionnaire (see Appendix 1) to the 92 FA Premier League and Football League clubs, asking them for information about their

approach to equal opportunities, and requesting any ethnic monitoring data on areas such as management and coaching, talent identification, service provision and procurement. A slightly different version of this questionnaire was circulated to national and county organisations, including the Football Association, the FA Premier League, the Football League, the 43 English county football associations, the Football Foundation and the PFA.

The term 'national football organisations' is used to refer to the Football Association, the two professional leagues, the Football Foundation and the Professional Footballers' Association. County football associations have been considered separately.

Methodology

The questionnaires were analysed using statistical analysis, where the data permitted this, and qualitatively where the answers were open-ended or where respondents had submitted evidence, in the form of written equal opportunities policies, or descriptions of positive action schemes, for example.

Because of the nature of the evidence provided by the national football organisations, and the differences between them in role, size and responsibility, statistical analysis was considered inappropriate and the approach was to conduct a qualitative analysis of each organisation, along with comparative discussion.

The process of evaluating the questionnaire was extremely complex, partly because of the style and nature of the questionnaire, and partly because of the way respondents approached it. For example, some respondents used only the questionnaire to provide the information, while others provided information separately and/or additionally about issues raised by the questionnaire. Furthermore, response rates varied significantly, both to the questionnaire as a whole and to some of the questions. Then again, some questions, about employment practices, for example, were more applicable to some organisations than others, because of their structure. This means both the data and the conclusions based on the questionnaire need to be treated with caution. Nevertheless, we have been able to draw on earlier research in analysing the available information, to identify some of the issues facing the football industry.

This report is divided into three chapters.

- Chapter 1 presents a summary of the statistical findings, and a discursive analysis of the questionnaires returned by professional clubs and county football associations
- Chapter 2 analyses the responses sent in by the national football organisations
- Chapter 3 is an overall comparative discussion, leading to conclusions

The Appendices contain an example of the CRE questionnaire, census data on the ethnic breakdown of the population of England and Wales, and a bibliography, which includes material referred to in the text, and related studies.

1

Professional clubs and county football associations

All the national bodies invited to take part in the survey responded, as did 35 of the 43 county football associations (CFAs) (81%) in England. Although most of the professional clubs responded, the response rate varied between the FA Premier League (FAPL) and the three divisions of the Football League (FL)¹, as shown below. The relatively high response rate from the top teams and the CFAs is partly attributable to determined efforts by officers of the Football Association (FA) and the FAPL. However, it could also be that these clubs had to be seen to be committed to racial equality, because of the high-profile media coverage of racial discrimination cases in the professional game over the years. The lower response rates from clubs lower down the professional structure could be the result of the lower priority they gave to racial equality, or because they were less knowledgeable about the issue, or because they did not have the resources and expertise needed to complete the questionnaire.

Division	Response rate
FA Premier League	19 / 20 = 95%
Division One	19 / 24 = 79%
Division Two	16 / 24 = 67%
Division Three	11 / 24 = 46%

Professional clubs

As may be expected, given their relative size and organisation, the clubs in the FAPL appeared to be more prepared and better organised to consider racial equality than those in the lower divisions. However, good and bad practice exists at every level of the game. Many of the findings below apply to clubs in all four divisions.

Equal opportunities policies

Nearly all the FAPL clubs that responded to the CRE questionnaire had a written equal opportunities policy (89%), compared with less than half of the clubs in Division Three

1. The Football League has renamed its divisions recently, so that Division One is now known as Football League Championship, Division Two as Football League One, and Division Three as Football League Two. This report refers to the divisions by their old names. All percentages are rounded to the nearest whole number, except when the numbers are very small.

(45%). These results compared favourably with Bradbury's findings two years previously (Bradbury, 2002).

Workforce data

The presentation of general workforce data was haphazard. Most clubs gave precise details about the ethnic profiles of their professional players, coaches and their boards of directors, but less precise information about academy players and administrative staff, with some giving vague responses, such as 'mainly white'. The information about part-time (for example, match day) staff was mostly incomplete and several clubs did not even attempt to answer this part of the question. Monitoring, where it was said to take place, was usually informal and occasional rather than regular and systematic.

Recruitment and selection

Seventy-nine per cent of FAPL clubs, 84% of Division One clubs, 82% of Division Two clubs and 82% of Division Three clubs admitted to using informal methods of recruitment, compared with only 35% in Bradbury's survey (Bradbury, 2002). This suggests that further work is needed to obtain better information about what professional clubs are actually doing in this area.

Leavers

Less than half the clubs held exit interviews with leavers, and not all of these included questions about equality of opportunity.

Promotion and training

None of the clubs formally monitored promotion and training opportunities by racial group.

Board of directors

The number of directors ranged from three to 22, but rarely exceeded ten. Few of the directors were from non-white racial groups. The way board members were selected depended on the structure and ownership of the club; in some cases, clubs were entirely owned by a single individual (or one individual controlled more than 50% of the shares) and the 'owner' personally selected the board members. In other cases (especially clubs that are private limited companies), the board members were elected by shareholders at an annual general meeting. Neither method appeared to make much difference to the ethnic composition of the board.

Procurement

The clubs said they mostly used quality and value for money as criteria for buying in services and supplies. Contractors were chosen on the basis of merit and through an interview.

Playing staff

As the number of professional players was quite small, the replies to this question were generally much more complete and better presented than replies to many of the other questions asking for quantitative data. The proportions of black and Asian players were much higher and lower, respectively, than would be expected from the proportions of these groups in the population of England and Wales.

Academies

The number of players in academies varied widely, with some of the smaller clubs not appearing to run academies. Some respondents sent in detailed ethnic data, while others used more general terms – for example, ‘six black and the rest white’. The proportions of black and Asian academy players were much higher and lower, respectively, than would be expected from the proportions of these groups in the population of England and Wales, although the disparities were not as wide as for playing staff.

Spectators

The clubs were based in areas with diverse populations, but those that responded said the number of spectators from ethnic minorities was low.

Stadium management

Most of the clubs that responded said that stewarding policies were the key to dealing with racist behaviour and that they monitored their policies (some also mentioned the role of the police). Some clubs said their monitoring showed that there were no problems, while others gave details of a small number of arrests. On the training of stewards, most clubs said their stewards had received formal anti-racism training, but did not go into any detail about it.

FA Premier League

Nineteen of the 20 FAPL clubs responded to the survey and many also sent in documents in support of their answers. In some cases, however, the documents were used as a substitute for giving detailed answers to questions. FAPL clubs generally showed much more awareness of racial equality issues than clubs in the lower divisions and it was clear that many had taken practical steps to put their equality principles into practice.

Except where otherwise stated, percentages are based on the 19 replies received.

Equal opportunities policies

- Seventeen of the 19 FAPL clubs that responded (89%) said they had a written equal opportunities policy; 13 forwarded a copy with their response.
- Only four of the policies (24%) included a commitment to take positive action to deal with under-represented groups.
- All the clubs that responded said they had procedures for dealing with complaints of racial discrimination; nine (45%) said they monitored the outcomes of complaints, but only one could provide a breakdown of complaints that had been upheld. It also appeared that the clubs understood the complaints as referring to incidents involving spectators rather than their staff.

Workforce data

The clubs interpreted the staffing categories (for example, 'management' or 'administrative' staff) in different ways and this led to wide variations in the responses.

Seven of the 19 clubs that responded (37%) said they monitored their workforce by ethnic group and six (32%) said they intended to introduce monitoring.

Sixteen (84%) clubs were able to offer estimates of the numbers or percentages of staff from various ethnic groups. The average number of workers (for clubs providing this data) was: 14 full-time management staff (excluding one very large club); 80 (full-time equivalent) administration staff, although the numbers ranged from a minimum of four to 180; and 51 (full-time equivalent) coaching staff (part-time staff have been included as 0.5 full-time. The number of 'other' full-time staff, reportedly employed in running the stadium, box office, security, catering etc varied widely from 15 to 787. However, there may have been some misunderstanding of the question, since some clubs did not show any part-time staff in this category and most staff in this category are part-time, many of them match-day workers (for example, stewards, turnstile operators, catering, car parking, etc). The number of part-time staff employed on match day declared by clubs in other divisions ranged from 59 to 872. Again, this suggests that some clubs misinterpreted this question.

On the basis of the data provided, it appeared that ethnic minorities made up, around:

- 2% of management staff
- 4% of administration staff
- 6% of coaching staff
- 20% of other staff.

Recruitment and selection

- *Planning:* Sixteen of the clubs that responded (84%) said they used job descriptions for vacancies, and 11 also prepared person specifications. Nine clubs (47%) said they used a standard application form.
- *Advertising:* Jobs were advertised through the club's website, programmes, internal communication channels, job centres and local newspapers. Fifteen clubs (79%) also relied on informal recruitment methods. Eight (42%) said they included an equal opportunities statement in the advertisements, but only one club specifically encouraged applicants from under-represented groups, by directing some advertising at 'targeted groups'.
- *Shortlisting and interviewing:* Six of the clubs that responded (32%) said they tried to ensure a balance between men and women on selection panels, and five (26%) did the same for ethnic groups. Selection panels consisted of between two and four members, but only five clubs (26%) trained them on selection methods or equality issues. Sixteen clubs (84%) said they kept all 'job documentation' on file and no club said it did not do so; however, it was clear that the clubs were not too sure what 'job documentation' meant.
- *Selection criteria:* Eighteen of the clubs that responded (95%) said they were satisfied that their selection criteria were strictly job related, appropriate in every case and would not have an adverse impact on any ethnic group. However, it should be borne in mind that these were judgements made by those carrying out the procedure, and might have been subjective.
- *Monitoring:* Only two of the clubs that responded (11%) monitored job applicants, shortlisted candidates and appointees, by ethnic group; one club thought there was differential impact on some ethnic groups.

Leavers

Eleven of the clubs that responded (58%) held exit interviews with leavers and nine (47%) included questions on equality of opportunity. Only one club said it had identified any equal opportunities issues as a result.

Promotion and training

None of the clubs that responded monitored promotion and training take-up rates by ethnic group. Most relied on an applicant's performance in their present job, and comparison with other applicants (internal and external) as the main criteria for promotion. Six clubs (32%) provided training on equal opportunities for their staff.

Board of directors

The number of directors ranged from 3 to 22. Only one club said it had a non-white director (on a board of seven). The way board members were selected depended on the structure and ownership of the club.

Procurement

Generally, the clubs that responded said that services, such as catering franchises, printing, etc, were awarded 'on merit', to provide the best value for money for the club. None of them appeared to take equality of opportunity into consideration in procurement.

Playing staff

Fourteen of the clubs that responded (74%) provided an ethnic breakdown of their playing staff. The combined figures showed only two Asian players, and four from the Chinese or Other group, compared with 113 from the black group and 23 from the Mixed Race group. See below.

	Total No.	%
Asian/Asian British	2	0.4
Black/Black British	113	20.3
Chinese/Other	4	0.7
Mixed Race	23	4.1
White	415	74.5
Total	557	100

Since many of these players were likely to be foreign nationals, and no data were provided about their nationality, it was not possible to compare these employment figures with either UK or EU population figures. However, it was clear that white and Asian players were under-represented, and black players disproportionately over-represented, compared with the proportions of these groups in the UK population.

Academies

Six of the clubs that responded (32%) said that equal opportunities was part of their scouting policy.

Twelve clubs (63%) gave details of the various methods they used to find players. Some clubs went outside their locality and specifically targeted, say, an Asian League in another area. Others said they had few players from ethnic minority groups in their region; for example, one club said, 'there are very few coloured players in the north-east and the club is unaware of any Asian communities that actually play football'. Twelve clubs (63%) gave an ethnic breakdown of the under-16 academy players, as shown below:

	Total No.	%
Asian/Asian British	10	0.8
Black/Black British	156	12.2
Chinese/Other	9	0.7
Mixed Race	59	4.6
White	1,049	81.7
Total	1,283	100

Since almost all these players were likely to be UK citizens, the numbers could be compared with the population figures for England and Wales (even though the recruitment areas for these players were relatively local and it would have been more accurate to use local population data for the comparisons). Black players were significantly over-represented (12.2% compared with 2.19% of the population of England and Wales), and Asian and Chinese players, taken together, significantly under-represented (5.23% of population).

In the over-16 age group the number of academy players was far lower. Fourteen clubs (74%) gave ethnic breakdowns, but used three different classification methods, making comparisons difficult. However, the proportion of over-16 black players rose to 14.2%, and the proportion of white players fell to 80.2%. Only two of the 268 players were Asian or Chinese.

Spectators

Thirteen of the clubs that responded (68%) had made some effort to increase ethnic minority attendance, and ten of them (53%) said the schemes they had introduced had been effective.

Stadium management

Seventeen of the clubs that responded (89%) said they had policies to tackle racist behaviour at matches and 16 (84%) monitored the policies. Seventeen clubs (89%) gave their stadium staff anti-racist training, but did not provide any details about it.

Division One

Nineteen of the 24 Division One clubs that responded (79%) filled in the CRE questionnaire. Many of these clubs had been members of the FAPL at some time and it was clear that they understood the importance of maintaining strict controls against racist behaviour at matches, and that their policies had generally been effective. The recruitment of players for academy and senior teams showed a relatively high proportion of black players, but hardly any Asian players. In general, the clubs did not appear to have much understanding of racial equality issues in respect of their own staff.

Except where otherwise stated, percentages are based on the 19 replies received, even when the data provided was minimal.

Equal opportunities policies

Fifteen of the clubs that responded (79%) had a written equal opportunities policy and 13 attached a copy. Four clubs said they intended to draw up a policy.

The policies included procedures to deal with complaints of racial discrimination and harassment, but it was clear from the clubs' responses that they were referring more to actions by spectators than by their staff.

Only six clubs' policies (32%) included a commitment to take positive action to deal with under-representation.

Workforce data

Only three clubs that responded (16%) monitored their workforce by ethnic group, but none of them provided ethnic breakdowns. Two clubs said they were in the process of introducing monitoring and three said they intended to do so.

Twelve clubs provided estimates of the ethnic composition of their workforce, but it was not easy to interpret or analyse the data, because of the wide variety of methods the clubs used to present the information. It appeared from the information that nine clubs had some non-white management, administration or coaching staff.

From the data provided, it appeared that ethnic minorities made up around:

- 4% of management staff
- 2% of administrative staff
- 5% of coaching staff
- 10% of other staff (including part-time match-day staff).

Recruitment and selection

- *Planning:* Fifteen of the clubs that responded (79%) prepared job descriptions for each vacancy; thirteen also prepared person specifications. Seven clubs (37%) said they used a standard application form.
- *Advertising:* Sixteen of the clubs that responded (84%) sometimes used informal methods of advertising.
- *Shortlisting and interviewing:* Ten of the clubs that responded (53%) said they tried to ensure a balance of ethnic groups on their panels, while 12 did the same for men and women. Six clubs (32%) said panel members were trained on equality issues.
- *Selection criteria:* Seventeen of the clubs that responded (89%) said their selection criteria were strictly job-related and appropriate in every case (the other two clubs did not answer this question).
- *Monitoring:* Only one club (5%) monitored job applicants by ethnic group.

Leavers

Ten clubs (53%) held exit interviews with leavers, and five (26%) included questions on equality of opportunity, but without any issues being brought up as a result.

Promotion and training

Only one club monitored the take-up of promotion and training opportunities by ethnic group. Six clubs (32%) gave their staff training in equal opportunities.

Boards of directors

The size of the boards varied from three to seven (one club was in administration). One director was black and one Asian. On the basis of the responses, which were not very clear about the selection process, at least six clubs selected board members mainly by election at the general meeting of shareholders, while four clubs said members were appointed on the invitation of the Chair.

Procurement

Clubs generally indicated that contractors were selected through interview and on the basis of merit.

Playing staff

As the number of professional players was quite small, ranging from 21 to 47 per club, and information about them well known, the replies to this question were generally much more complete and better presented than many of the other questions requesting

quantitative data. Seventeen per cent of the players were black, 8% of mixed race and 75% white. One member of playing staff was Chinese and there were no Asians.

Academies

Ten of the clubs that responded (53%) said that equality of opportunity was considered as part of their scouting policy.

The wide variety of ways in which clubs answered the question about the ethnic composition of their academies – for example, responses referred to actual numbers, percentages or vague estimates, such as ‘mixed’, ‘small number of Black and Asian’ – made any detailed statistical analysis impossible. However, it was clear that there were virtually no Asian players in the academies. The clubs referred to the various methods they used to ensure that they reached all communities when recruiting for academies, while basing all selection on merit.

Spectators

Fifteen of the clubs that responded (79%) had taken steps to increase ethnic minority attendance at matches. Five clubs said these had been successful and only one said they had not; the others did not give details. Estimates of the ethnic make-up of the local population varied considerably. The clubs used different sources of information, with some responding in generalisations that made any statistical analysis impossible, for example ‘all groups represented’, ‘majority are white’, ‘high white’, ‘mixed’, ‘multi-cultural’, ‘mainly Jewish’, ‘small Chinese’, etc.

Stadium management

All 19 Division One clubs that responded said they had a strict policy for dealing with racist behaviour at matches. Sixteen (84%) said it was monitored, and that arrests and/or life bans were imposed whenever incidents occurred. Seventeen clubs (89%) said they gave their stewards anti-racist training, although they did not provide any details.

Division Two

Sixteen of the 24 Division Two clubs completed and returned the CRE questionnaire. Most answered all the questions. A small number suggested that they had had few or no problems with racism or, as one of them put it, ‘ethnic problems’. Apart from the information sent in by one club about an anti-racism campaign it had been running among its fans, no other evidence was submitted to back up the clubs’ answers. Most, however, seemed aware of the importance of effective stewarding policies.

Except where otherwise stated, percentages are based on the 16 replies received, even where the data provided was minimal.

Equal opportunities policies

- Twelve of the 16 Division Two clubs that responded (75%) said they had an equal opportunities policy. Only one of the clubs that did not have a policy said it had no intention of developing one.
- The policies submitted varied in quality, with four of them including a commitment to positive action.
- Nine clubs (56%) had complaints procedures for racial discrimination, but only five of these included harassment. Ten clubs (62%) said they could monitor complaints, but only two actually provided an ethnic breakdown of the monitoring (both saying as well that nothing had been reported).

Workforce data

None of the clubs that responded monitored their workforce regularly and systematically by ethnic group, and only two (12%) said they were planning to do so.

On average, the clubs employed seven full-time management staff, 12 full-time administration staff, seven full-time coaching staff and 19 full-time other staff. Figures for part-time staff varied widely, as some clubs included match-day workers in their statistics, making comparison and averaging difficult. On the basis of the data provided, it appeared that ethnic minorities were under-represented, especially in management and administration). In percentage terms, ethnic minorities made up around:

- 2% of management staff
- 1% of administration staff
- 11% of coaching staff
- 5% of other staff.

Recruitment and selection

- *Planning:* Thirteen clubs (81%) said they used job descriptions, but only seven (44%) also prepared person specifications. Seven clubs (44%) said they used standard application forms.
- *Advertising:* Most of the clubs advertised in the local press or job centres and 13 (81%) admitted to using informal methods of recruitment. Only four (25%) included an equal opportunities statement in their advertisements, and none had statements specifically encouraging applicants from under-represented groups to apply.
- *Short-listing and interviewing:* Procedures varied widely: three clubs (19%) said they tried to ensure an ethnic balance on the panel (and four did the same for men and women), and three (19%) said they trained panel members on equality issues or selection methods. Twelve clubs (75%) said they retained job documentation.

- *Selection criteria:* Most of the clubs that responded said they were satisfied that the selection criteria used were objective, and that they would not have an adverse impact on any ethnic group, although one club admitted it wasn't sure the criteria were appropriate in every case.
- *Monitoring:* None of the clubs monitored the ethnic groups of job applicants.

Leavers

Seven clubs (44%) held exit interviews with leavers, but only two clubs (12%) included questions about equality of opportunity in the interview.

Promotion and training

Answers varied widely as to how people were selected for promotion and training, with three clubs mentioning competition. No club monitored the take-up of either promotion or training opportunities, by ethnic group. Only two clubs (12%) said they offered their staff equal opportunities training.

Boards of directors

The size of the boards varied across the division from three to eight. Information about selection methods was often vague or missing. However, elections appear to have been used to select members for some boards and one club mentioned selection 'by invitation'. Only one director (1.3%) in the Division as a whole was said to be from an ethnic minority group.

Procurement

None of the clubs had taken steps to ensure equality of opportunity in procurement. One club said it expected contractors to have their own equal opportunities policies.

Playing staff

All the clubs provided data on the ethnic groups of their playing staff, but the information was not detailed or consistent enough for comparison with the 2001 Census. Based on the usable data, 17.6% of playing staff, on average, were from ethnic minorities.

Academies

Only one club said that equality of opportunity was included in their scouting policy.

Five of the clubs that responded provided usable details about the ethnic groups of academy players; three clubs did not run academies. Again, the information was not

detailed enough for comparison with the 2001 Census. Based on the usable data, average ethnic minority representation was 11.0% in the under-16 age group, and 10.1% in the over-16 age group. Only one club considered equal opportunities as part of its scouting policy.

Spectators

Nine of the clubs that responded (56%) said they were taking, or had taken, steps to increase ethnic minority attendance at matches, compared with five (31%) that had not done anything (the remainder did not answer the question). The initiatives mentioned included *Kick It Out*, local anti-racism campaigns, Football in the Community projects, links with local ethnic minority groups and appointment of a dedicated ethnic minority liaison officer. Four (44%) of the clubs that had taken action said it had been successful.

Stadium management

Most of the clubs that responded referred to stewarding policies, and two also mentioned the role of the police. Fourteen clubs (88%) said they monitored the effectiveness of these policies, with two claiming there were no problems, and five giving details of a small number of arrests. One of the two clubs that did not monitor said it had no plans to do so. On the training of stewards, 12 clubs said their stewards received formal anti-racism training.

Division Three

Eleven of the 24 Division Three clubs (46%) returned the CRE questionnaire, but one club did not answer any of the questions, attaching a letter to the CRE instead, to the effect that it was 'supportive of equal opportunity issues'. Another club, while answering the questions, suggested that the questionnaire was irrelevant because it had 'no ethnic problems'. Generally, Division Three clubs supplied much less evidence than clubs in other divisions in support of the work they had done. However, one club had produced an excellent anti-racism leaflet, which it distributed to fans and local community groups. A majority of the clubs had taken, or were taking, steps to attract ethnic minority supporters.

Except where otherwise stated, percentages are based on the 11 replies received, although in one case the data provided was minimal.

Equal opportunities policies

- Only five of the 11 clubs that responded (45%) said they had an equal opportunities policy. One of the clubs that did not have a policy said it was not planning to develop one.

- The policies submitted with the questionnaires varied in quality, but four out of the five clubs with a policy did say that the policy included a commitment to positive action.
- Four clubs (36%) said they were able to monitor complaints of racial discrimination and harassment policy, but only two of them provided an ethnic breakdown of complaints.

Workforce data

No club formally monitored its workforce by ethnic group, and only three (27%) said they were planning to do so.

The clubs employed, on average, five full-time management staff, five full-time administration staff, four full-time coaching staff and five full-time other staff. Figures for part-time staff varied widely, as some clubs included match-day workers in their statistics, making comparison and averaging difficult. People from ethnic minorities in the workforce could almost be counted on one hand, except in coaching. In percentage terms, based on information from the clubs that responded, ethnic minorities made up around:

- 0.02% of management staff
- 15% of coaching staff
- 3% of other staff.

Recruitment and selection

- *Planning:* Five of the 11 Division Three clubs that responded (45%) said they used job descriptions, but only two (18%) said they also prepared personnel specifications. None used standard application forms.
- *Advertising:* Most of the clubs that responded advertised in the local press, but one club said it did not advertise jobs, and another suggested it often did not bother advertising. Nine clubs (81%) admitted to using informal methods of recruitment. Only four clubs (36%) included an equal opportunities statement in their advertisements and only two (18%), overall, had statements encouraging applicants from under-represented groups to apply.
- *Short-listing and interviewing:* Procedures varied widely: five (45%) clubs claimed they tried to ensure a balance of ethnic groups on the selection panel, but only one club (9%) trained panel members on equality issues or selection methods. Seven clubs (64%) said they retained job documentation.
- *Selection criteria:* All the clubs that responded said they were satisfied that they used objective selection criteria, and that these would not have an adverse impact on any ethnic group.

- *Monitoring:* Only one club (9%) said it monitored the ethnic groups of job applicants, but it did not give any details.

Leavers

Four clubs (36%) held formal exit interviews with leavers, and only one club included questions on equality of opportunity in the interview.

Promotion and training

Answers to the question about how people were selected for promotion and training varied widely, with one club saying there were few such opportunities and four clubs not answering. No club monitored the take-up of either promotion or training opportunities by ethnic group. Only one club (9%) said it offered equal opportunities training to staff.

Boards of directors

The size of boards varied across the division from three to ten. Some members were elected, and it wasn't clear what process was used for the others. One club said the Chair picked the board members, while another suggested that appointment depended on a candidate's ability to contribute financially to the club. Four directors, concentrated on the boards of two clubs (18%), were identified as being from ethnic minorities.

Procurement

None of the clubs took any steps to ensure equality of opportunity in procurement.

Playing staff

Eight clubs provided data about the ethnic groups of their playing staff, but the information was not detailed enough to permit comparison with the 2001 Census. All eight clubs responding to this question had ethnic minority players; on average, 19.5% of playing staff were from ethnic minorities.

Academies

None of the clubs considered equal opportunities as part of their scouting policy.

Only five clubs (45%) provided details about the ethnic groups of academy players; four clubs (36%) did not run academies. The information was not detailed enough to permit comparison with the 2001 Census. However, on the basis of what was provided, average ethnic minority representation was 7.6% in the under-16 age group, and 18.4% in the over-16 age group.

Spectators

Encouragingly, seven clubs (64%) said they were taking, or had taken, steps to attract ethnic minority supporters, compared with three (27%) that said they had not done anything. The initiatives mentioned included *Kick It Out*, local anti-racism campaigns, Football in the Community projects, links with local ethnic minority groups and trade unions, and distribution of free tickets. Two of the clubs that had taken action said it had been effective.

Stadium management

Five clubs (45%) said they monitored the effectiveness of their stewarding policies, but with no observed results, apart from one club accepting that there were rare instances of racism. Of the clubs that did not monitor, two said they had no plans to do so. On the training of stewards, eight out of nine clubs that answered this question said their stewards received formal anti-racism training.

County football associations

The CFAs are very different in character from the professional football clubs. They have few employees, do not employ players, and are non-profit voluntary bodies answerable to their members, namely, the football clubs in the county, which number from 72 to 2,037. Typically, a CFA will elect the members of its board and council at an annual general meeting of its member clubs (most of which are recreational in nature², and do not have any paid players or staff of their own). Thirty-four of the 43 CFAs (79%) responded to the CRE questionnaire (which was only sent to CFAs in England).

Most CFAs were very aware of the FA campaign to eliminate racism from all levels of the game, and their responses showed that they made every effort to ensure that their affiliated associations and leagues subscribed to this aim, and that it was adhered to by their clubs and by match officials.

However, CFAs were less conscious of, or likely to, take any direct action to promote equality in their own organisations. Typically, they had a very small number of staff (the largest had just 18 workers and the average number was 7.5, including coaching staff).

As the evidence from an earlier study for the British Institute of Sports Administration (Welch and Long, 1993) showed, it appears to be the nature of sport, especially non-professional sport (and the vast majority of players served by the CFAs are non-

2. Of course, football clubs are likely to be engaged in competition with teams from other clubs, but the *raison d'être* for most clubs is to provide active recreation for their members.

professional), for it to be run by enthusiasts, who make considerable personal sacrifice to serve the sport they love. This also applies to many staff positions, which are often relatively poorly paid for the amount and level of work and time required. However, these clubs still attract high-calibre people, who are prepared to accept low levels of remuneration in return for doing a job they are passionate about. Other work would suggest that this is a feature of CFAs.

Except where otherwise stated, percentages are based on the 34 replies received, even when the data provided was minimal.

Equal opportunities policies

It was clear that, in answering this question, many respondents had considered it in respect of the procedures they used for their members, clubs, leagues and associations rather than those they applied to their own officers and staff (although, of course, any policy applicable to members would also apply to the CFA itself). Twenty-one CFAs (62%) said they had a written equal opportunities policy and 19 (56%) enclosed a copy. Seventeen (50%) had a procedure to deal with complaints of racial discrimination or harassment, but none of them could provide an ethnic breakdown of complaints upheld.

Workforce data

Eight CFAs (24%) said they monitored their workforce by ethnic group, but in such a small workforce, monitoring does not need to involve formal processes. The workforce and its composition are usually well known to management staff and honorary officers. When asked, most were able to say how many staff were from an ethnic minority background; only one CFA had staff from non-white groups.

Recruitment and selection

- *Planning:* Thirty-one CFAs (91%) said they used job descriptions to fill vacant posts and 29 also used person specifications. Sixteen CFAs (47%) said they used a standard application form.
- *Advertising:* Fifteen CFAs (44%) sometimes used informal methods of recruiting and the same number included an equal opportunities statement in their job advertisements; however, only two (6%) specifically encouraged applicants from under-represented groups.
- *Short-listing and interviewing:* Seventeen CFAs (50%) said they tried to ensure a balanced panel in terms of men and women and 11 did the same for ethnic groups. 29 CFAs said they retained job documentation.
- *Selection criteria:* Thirty CFAs (88%) were satisfied that the selection criteria they used were strictly job-related, appropriate in every case and would not have an adverse impact on any ethnic group.
- *Monitoring:* Only two CFAs (6%) monitored applicants by ethnic group.

Leavers

Fourteen CFAs (41%) held exit interviews with leavers, but only four (12%) included questions on equality of opportunity; they said that no issues had been raised as a result.

Promotion and training

With such small staff complements, and so few staff from ethnic minority backgrounds, it was not surprising that only one CFA said it monitored promotions by ethnic group. Eight CFAs (24%) provided equal opportunities training for their staff.

Procurement

CFAs do not buy in catering, stewarding, and other similar services.

Board of directors/council

Typically, a CFA has a management board with between six and 12 members, and a council made up of between 14 and 79 members. Board and council members are all voluntary officers, nominated and elected by the associations, leagues and clubs of the CFA, not by the CFA itself. Only nine CFAs said that any members of their council were from ethnic minorities. In total, eight councillors were black and five Asian out of a total of 810 members of boards and/or councils (it was often not clear which they were referring to, as members of the board are normally also members of the council).

2

National football organisations

The Football Association

The Football Association (FA) submitted a large amount of evidence in support of its commitment to tackling racism and promoting racial equality, not least its funding of *Kick It Out*. The FA had reached the preliminary level of the Sporting Equals Standard and was working towards the intermediate level. It had appointed a team of staff, including a Head of Ethics and Sports Equity and an Ethics and Sports Equity Manager, who were responsible for monitoring and implementing an ethics and sports equity strategy across all aspects of the FA³.

Equal opportunities policies

- The FA had a very detailed equal opportunities policy, which covered staff, job applicants and the public, and had been widely disseminated. The policy included definitions of discrimination and referred to a complaints and disciplinary procedure.
- The policy listed all the groups that could be discriminated against unlawfully.
- The policy had been published in the FA staff handbook and on the intranet, and formed part of the induction process for new staff.
- The policy did not include a commitment to take positive action to deal with under-representation.
- The policy was reviewed 'periodically', and had been updated recently to take account of changes in employment legislation relating to discrimination on grounds of religion or belief and sexual orientation.
- The FA did not have formal methods for monitoring the policy, but it did for monitoring the ethics and sports equity strategy, which is being put into effect across every part of the FA.
- The FA had a grievance procedure, which was in the staff handbook, as well as a separate, detailed harassment policy (again, included in the staff handbook).

3. An All-Agency Review Team comprising the FA, the FAPL, the FL, the PFA, the League Managers Association and the FF was set up in November 2003. One of its priorities has been to look at ways of tackling racism, promoting racial equality and implementing equal opportunities policies and procedures. Following discussions, the team has produced a ten-point action plan.

- No evidence was provided about monitoring mechanisms for the complaints procedure. However, the FA said it had a mechanism, and that, in the last twelve months, one complaint had arisen, which was currently being investigated.

Workforce data

- The FA had 175.5 management staff, 19 of them (10.8%) from ethnic minorities, and 74 administration staff, ten of them (13.5%) from ethnic minorities. The figures for ethnic minorities included staff from the Irish and White Other groups; excluding these, the percentages of ethnic minority staff fell to 8.0% and 9.5%, respectively. People from non-white groups make up 28.8% of London's population, although it should be noted that 30% of FA staff were home-based or at Lilleshall and therefore lived in a different region for monitoring purposes.
- The FA monitored ethnicity through a form issued to new staff, and through regular workforce audits.
- The FA monitored average length of service for staff from each ethnic group. However, since it used different categories from those in the 2001 Census, no comparison was possible with the Census data. The following observations can nevertheless be made, so long as the figures are treated with caution: among administration staff, people from the White UK group had an average length of service of 9.75 years, compared with 2.83 years for staff from the Black Caribbean group. In January 2004, the FA adopted the 2001 Census categories for all monitoring.

Recruitment and selection

- *Planning:* The FA's recruitment and selection procedures were potentially subjective. Job descriptions and person specifications were produced for all vacancies, but applicants were also encouraged to send in CVs, with a covering letter.
- *Advertising:* Most jobs were advertised formally in the national and industry press, on the FA website, and through a 1,200-strong database of contacts in the equality field and among ethnic minority communities. However, informal recruitment methods were 'occasionally used in highly specialist roles'. An equal opportunities statement was always included in the job advertisement, but applicants from under-represented groups were not specifically encouraged to apply. However, pictures of people were removed from the advertisements 'to avoid discouraging any sector of the community from identifying with the FA'.
- *Shortlisting and interviewing:* the size of selection panels varied from two to three, and the FA tried to ensure a balance in terms of men and women and different ethnic groups, 'where possible'. The same people were used for shortlisting and interviewing, but a second interview was often added with the line manager's manager. All line managers had had recruitment and selection training, and a Human Resources representative was always involved in the selection process. All job documentation was retained for one year.

- *Selection criteria:* the FA was satisfied that its selection criteria and tests were strictly job-related, appropriate in every case and that they would not have an adverse impact on any ethnic group. Evidence was provided to back up these claims.
- *Monitoring:* the FA had monitored recruitment and selection by ethnic group since 2003, and provided evidence of this. The FA also provided detailed ethnic monitoring figures from the two recruitment consultancies it used for temporary staff, pointing out that it had deliberately chosen to work with one of them because of 'the diversity of the workforce that it attracted'. In the period November 2002 to November 2003, three of the seven (42.9%) temporary members of staff placed with the FA were from ethnic minorities. Over the same period, 11 people were recruited directly, two of whom (18.2%) were from ethnic minority groups. The FA said that its monitoring had not uncovered differential impact on any ethnic group.

Leavers

The FA did have a formal procedure to hold exit interviews with leavers, but the interview form did not have a question about equality of opportunity. The FA explained that the questions allowed equal opportunities to be raised during the interview, and that no issues had emerged from the interviews since they were introduced two years previously.

Promotion and training

Selection for promotion was based solely on ability, which was assessed through a formal performance and development review process, including interviews, where applicable. Training requirements and opportunities were identified through the formal performance and development review process. Training courses were run in-house for staff at each grade, and anyone could apply, with managers approving training on a case-by-case basis. The FA did not monitor the take-up of promotion and training opportunities by ethnic group, but it calculated that 11.5% of promotions in 2003 involved people from ethnic minorities, and believed there was no differential impact on any ethnic group. All line managers had received equal opportunities training as part of the recruitment and selection training. In addition, the FA was in the process of introducing a comprehensive sports equity training plan, as part of its ethics and sports equity strategy.

Board of directors/council

All 14 members of the FA board, and all 92 members of the council described themselves as white. Board members, with the exception of the chief executive of the FA, were elected through the council, whose members were representatives of CFAs, affiliated leagues and other affiliated bodies.

Procurement

The FA had a comprehensive formal tendering process. When drawing up a list of potential suppliers, the FA took into account a company's reputation and the quality of

its staff. However, 'at present the standard tender process... has no direct questions relating to the organisation's practice in relation to equality of opportunity'.

Referees

The FA formally monitored the ethnic groups of its referees. In its 2003 survey, it found that 2.2% of referees said they were from an ethnic minority group, with 0.3% not answering the question. The FA did not have a specific equal opportunities policy on refereeing, and suggested that it had a shortage of referees. The FA said that CFAs were 'required to provide fair access to referee recruitment and training opportunities'. The FA provided evidence of good racial equality practice around referee recruitment from two areas, one of which is working with Eastern Europeans, the Turkish community, and the Asian community and has active referees from a wide range of ethnic groups.

The FA Premier League

The FAPL included in its evidence a copy of the 'Racial Equality Standard for Clubs', developed together with *Kick It Out* and other football bodies, as an example of its commitment to making racial equality an essential aspect of the professional game. It also sent additional evidence on work it is doing to audit fans through the 'national fan survey' (2% of whom are from ethnic minorities), develop education initiatives around race and diversity, and take positive action to increase ethnic minority participation in football, as players, spectators and coaches.

Equal opportunities policies

- The FAPL had a written equal opportunities policy, which included definitions of different types of discrimination and harassment, and a complaints and disciplinary procedure.
- The policy covered all the groups that may be discriminated against unlawfully.
- Lord Herman Ouseley, Chair of *Kick It Out*, had trained FAPL staff on the policy in 2001.⁴
- The policy was published in the staff handbook and formed part of the induction process for new staff.
- The policy did not include a commitment to take positive action to deal with under-representation.
- The policy was reviewed, to make sure it took account of new legislation, but the FAPL did not give any details about the review process, or how often reviews were carried out.

4. It was unclear whether this involved all staff, and whether new staff appointed since then had received any training

- The FAPL claimed that, as a small organisation, it did not have formal procedures for monitoring the policy.
- The policy described clearly the FAPL's procedures for dealing with complaints of racial discrimination and harassment. There were no separate complaints policies or procedures.
- No evidence was provided about monitoring the complaints procedure. However, the FAPL said no complaint of racial discrimination or harassment had ever been made.

Workforce data

- The FAPL had seven management staff, one of whom was from an ethnic minority group, and 41 administration staff, six (14.6%) of whom were from ethnic minorities. It should be noted that 28.8% of London's population are from non-white ethnic groups.
- The FAPL did not monitor its workforce by ethnic group (except, presumably, for this exercise).
- As most staff had been recruited in the previous five years, the FAPL felt that it would not be meaningful to give average length of service figures for each ethnic group.
- The FAPL said that, as a small organisation, it did not have formal monitoring procedures.

Recruitment and selection

- *Planning:* The FAPL produced job descriptions and person specifications for all vacancies, although it did not use a standard application form.
- *Advertising:* Jobs were advertised in newspapers and through recruitment agencies, as well as more informally through football networks. The FAPL also trawled through its database of unsolicited CVs sent in to them. Since 2003, all advertisements included an equal opportunity statement, but not any specific encouragement for applicants from under-represented groups.
- *Shortlisting and interviewing:* the size of selection panels depended on the vacancy. 'As a small organisation', the FAPL said it had not sought to ensure a balance between men and women, and between ethnic groups, on its selection panels. The same people were not always used for shortlisting and interviewing, although this 'depends on the vacancy'. However, all panel members were trained on equality issues, and training on selection techniques was being planned. All job documentation was retained.
- *Selection criteria:* the FAPL was satisfied that its criteria and tests were strictly job-related, appropriate in every case and would not have an adverse impact on any ethnic group.

- *Monitoring*: the FAPL had not monitored recruitment and selection by ethnic group, but it was planning to introduce an equal opportunities form.

Leavers

The FAPL did not hold exit interviews with leavers.

Promotion and training

Promotion procedures depended on the vacancy, but normally included appraisal, management decisions and internal advertisement. Training requirements were identified through formal appraisal, induction or as part of a continuous improvement process. The FAPL said that no ‘job-related’ training opportunity had ever been withheld from an employee, and that staff were ‘actively encouraged’ to take up such opportunities. The FAPL did not monitor the take-up of promotion and training opportunities by ethnic group. However, all staff received equal opportunities training (see above).

Board of directors/council

The FAPL said it did not have either a board or a council, and did not give any information about its governance arrangements.

Procurement

The FAPL explained that, ‘the vast majority of work is carried out in-house’, and ‘any external contracts are extremely small’. It did not formally monitor external contractors’ equal opportunities practice. However, it made sure that recruitment agencies were aware of its equal opportunities policy and kept a copy of the agency’s policy on file.

The Football League

The Football League (FL) did not provide any evidence of its work to tackle racism and promote racial equality, apart from the policies described below.

Equal opportunities policies

- The FL had a written equal opportunities policy, which was a basic statement of intent. It did not include explanations of the different types of discrimination and harassment, but it did refer to a complaints and disciplinary procedure.
- The policy listed all the groups that may be discriminated against unlawfully.
- The policy was published in the FL staff handbook and formed part of the induction process for new staff.

- The policy did not include a commitment to take positive action to deal with under-representation. The FL said it believed that ‘all applicants and employees are treated equally and without discrimination ... all applications are assessed on the basis of qualifications and experience’.
- The policy was reviewed each year, as it was part of the FL’s Customer Charter,⁵ and whenever there was ‘a need to update employees’ conditions generally’.
- The HR manager was responsible for providing an overview of the policy, and ‘there [was] a responsibility on each Section Head to ensure the policy is adhered to’.
- The staff handbook included a grievance and disciplinary procedure, where sexual or racial harassment was described as ‘gross misconduct’. The FL did not have separate policies or procedures for dealing with racial discrimination or harassment.
- No evidence was provided about how the FL monitored the complaints procedure. However, the FL said it did have a mechanism, and that, in the last twelve months, there had been one complaint ‘regarding ethnicity’.

Workforce data

- The FL had 14.5 management staff, 28.5 administration staff and 12 other staff (referee coaches, youth development and sponsorship). The only ethnic minority staff (6.9%) were among the FL’s administration staff.
- The FL did not answer the question about ethnic monitoring, although the implication was that it did monitor (or, at least, that it had monitored its staff in order to respond to the questionnaire).
- The FL said it could specify average length of service by ethnic group, but did not supply any data.

Recruitment and selection

- *Planning:* The FL’s recruitment and selection procedures were potentially subjective. Job descriptions were produced for all vacancies, but not person specifications, and applicants were encouraged to send in CVs, followed up by a standard application form.
- *Advertising:* Jobs were advertised in newspapers, as well as more informally through ‘footballing networks’. The advertisement did not include an equal opportunities statement, but the FL said that all applications were acknowledged, and a copy of the equal opportunities policy included in the response, along with the application form and further details. The advertisements did not include specific encouragement for applicants from under-represented groups, as the FL believed they were ‘open to all equally’.

5. There was no indication of whether this Charter also covered service delivery

- *Shortlisting and interviewing:* the size of selection panels varied, and the FL did try to ensure a balance between men and women, and between ethnic groups, on its selection panels. Normally, the same people were used for shortlisting and interviewing, but on a recent occasion, because of the number of applicants, the HR manager drew up the shortlist. All panel members were 'usually' trained on equality and selection issues, or given advice and guidance by the HR manager. All job documentation was retained.
- *Selection criteria:* the FL was satisfied that the criteria and tests it used were strictly job-related, appropriate in every case and would not have an adverse impact on any ethnic group.
- *Monitoring:* the FL did not monitor recruitment and selection by ethnic group, but said it was planning to do so.

Leavers

The FL did not have a procedure of formal exit interviews with leavers, but the HR manager did hold informal exit interviews, where any equal opportunities matters could be raised; however, 'no equal opportunities issues have ever been raised'.

Promotion and training

All promotion opportunities were advertised and applicants dealt with according to the recruitment and selection procedures. Training requirements were identified through formal appraisal, induction or as part of a continuous improvement process by staff themselves. The FL did not monitor the take-up of promotion and training opportunities by ethnic group, although it claimed confusingly that 'such information is documented and retained'. Only a few 'key staff' had received equal opportunities training, but the FL said it was planning to extend the training to all staff.

Board of directors/council

The FL board consisted of seven directors, representing the FL's different divisions, and including an independent Chair. All the directors were white, although one was White Irish, and another White British (Greek Cypriot). Board members were appointed for three years, unless their club was relegated or promoted. Any director from the member clubs could stand for election, and the member clubs, as shareholders in the FL, could vote in any election. No information was given about the appointment or election of independent directors.

Procurement

The FL said that 'all services supplied to the League are open to tender from all'. Contractors' equal opportunities practice was 'judged on a case-by-case basis'. The FL had made sure that suppliers of official badges were contractually bound to ensure that their products were not manufactured through oppressive or underage labour. No other

examples were given, although the FL said it would 'endeavour to introduce similar provision' in other contracts, 'where appropriate'.

The Professional Footballers' Association

The Professional Footballers' Association (PFA) included evidence it had compiled to meet the preliminary level of the Sporting Equals Standard. The evidence demonstrated a commitment to tackling racism and promoting racial equality through publicity, policies, action planning, auditing, training and funding or otherwise supporting the work of *Kick It Out*. Having said that, the PFA recognised that it was 'not perfect' and had to continue to work towards a fully diverse workforce.

Equal opportunities policies

- The PFA had a written equal opportunities policy, which applied to staff, and a more general policy statement. The policy included definitions of the different types of discrimination and harassment, and discussed the complaints and disciplinary procedure.
- The policy listed all the groups that may be discriminated against unlawfully. It was distributed to all PFA staff, and included in the policy and procedure handbook. The general policy statement has been included in staff contracts since January 2004.
- The policy included a commitment to take positive action to deal with under-representation.
- There was no formal process for reviewing the policy, but the PFA was aiming to reach the intermediate level of the Sporting Equals Standard by 2005, and this includes such a process. The PFA monitored the policy regularly, and had a member of staff responsible for equality matters.
- The PFA had a complaints and disciplinary procedure for staff, which was published in the staff handbook, and one for players (members of the PFA), which was included in the PFA's Rules. Sexual or racial discrimination were defined through legal obligations and additional commitments to tackle harassment, victimisation and other such issues. There were no separate policies or procedures for dealing with racial discrimination or harassment.
- No evidence was provided about monitoring the complaints procedure. But the PFA claimed to be 'constantly monitoring' and in touch with the Football Association 'to track cases'. Again, monitoring was integral to the work they aimed to do to reach the intermediate level of the Sporting Equals Standard.

Workforce data

The PFA had 62 staff, but ten of them were not included in the equity audit carried out in 2003.⁶ The audit found that 29%⁷ of management staff described themselves as being from an ethnic minority group (all were Black British); there were no ethnic minority

staff in administration or coaching. The PFA recognised that its workforce did not mirror the diversity of the cities where it is based, and accepted that it needed to develop a more diverse workforce.

The PFA was committed in its equity action plan regularly to monitor its staff and members on all equality grounds, including ethnicity. The PFA did not supply length-of-service data.

Recruitment and selection

- *Planning:* The PFA used written job descriptions, but not person specifications. It also used standard application forms for each department, and advertised vacancies, but it also recruited by 'word of mouth'.
- *Advertising:* The PFA recognised that it needed to do more to ensure a more diverse workforce, and had launched a number of initiatives to ensure advertisements were placed in a wider range of publications, such as *The Voice* and other ethnic minority media. The PFA had also appointed an officer to work with black professional players, to help them progress from playing to coaching and management, including opportunities within the PFA.
- *Shortlisting and interviewing:* the size of selection panels was 'generally' three, and the PFA tried to ensure a balance between men and women (but not between ethnic groups) on its selection panels. The same people were used for shortlisting and interviewing. The PFA said all panel members 'have an understanding of equality issues', but did not give further details.
- *Selection criteria:* the PFA was satisfied that the criteria and tests it used were strictly job-related, appropriate in every case and would not have an adverse impact on any ethnic group.
- *Monitoring:* the PFA did not monitor recruitment and selection by ethnic group, but a new system is now up and running, as part of the work being done to reach the intermediate level of the Standard.

Leavers

The PFA had a formal exit interview process.⁸

Promotion and training

All promotion opportunities were 'available to all', but promotion was achieved 'through both loyalty and ability'. There were no formal promotion procedures.

6. No indication was given as to why they were not included

7 Actual numbers were not provided

8. There was no indication as to whether equal opportunities issues were discussed at the interview.

Training was also available to all; however, an analysis of training needs, carried out as part of the equality audit, had showed that 92% of staff had received no formal training in equality. The PFA was planning to give all staff such training within the following 12 months. The PFA did not monitor the take-up of promotion and training opportunities by ethnic group.

Board of directors/council

The board is made up of current professional footballers, so its make-up should reflect the make-up of professional football. The PFA said it had ‘several black committee members’, but did not give any figures. However, the PFA monitored the ethnic backgrounds of delegates to its AGM. The last audit showed that 7% described themselves as Black British or Mixed, with 1% from the White Other group and the rest from the White British group.

Procurement

The PFA did not have a formal procurement policy, but said that, as a trade union, it was ‘very conscious’ of the companies it associates with.

The Football Foundation

The Football Foundation (FF) is a grant-giving foundation that supports grassroots football. It is supported by the FA, and housed within the FA’s headquarters, but is managed by an independent board of trustees.

The FF submitted a written response to the questions, together with a copy of its employees’ handbook. However, it is known that the FF has signed the ‘Sporting Equals Racial Equality Charter for Sport’ and achieved the preliminary level of the Sporting Equals Standard.

Equal opportunities policies

- The FF had a basic equal opportunities policy. This apparently covered grant applicants, although the FF did not explain how. The policy included definitions of discrimination and a rigorous grievance procedure for staff. The FF said there was an appeals procedure for grant applicants, but did not enclose a copy.
- The policy listed all the groups that may be discriminated against unlawfully.
- The policy was published in the FF staff handbook, and was included in the induction process for new staff.
- The policy did not include a commitment to take positive action to deal with under-representation.
- The policy was written in 2002 and the FF said it would be reviewed in 2004.

- There were no formal methods for monitoring the policy. However, both job applicants and grant applicants were monitored by ethnic group, with the latter being asked to fill in monitoring forms every six months, if they were awarded a grant for a project.
- No evidence was provided about monitoring the grievance procedure. However, the FF said it had had only one complaint involving ethnicity since its formation, and this had resulted in suspension of the grant, new objectives for the project, and a closer working relationship with a local Asian community.

Workforce data

The FF had six senior management staff, and 27 administrative and other staff. The FF had not asked staff a question about their ethnic background, but was planning to do so in May 2004. However, it provided estimates, which showed that the FF had no one from an ethnic minority group among its management staff, and four ethnic minority staff (14.8%) in other areas (two Asian and two black). It should be noted that 28.8% of London's population are from non-white' groups.

The average length of service of staff who were not transferred from the Football Trust when the FF was formed in 2000 was 18 months; for ethnic minority staff, it was six months.

Recruitment and selection

- *Planning:* The FF had good but not perfect recruitment and selection procedures. Job descriptions and person specifications were produced for all vacancies, and a standard application form was used.
- *Advertisement:* Jobs were advertised in the national and industry press (where grant assessment or sports development experience was needed), or in *Metro* or the *Evening Standard* (for administration posts). For instance, one post, aimed at long-term unemployed young people, was filled through restricted advertising with the Prince's Trust. Generally, though, the job advertisement did not include an equal opportunities statement, nor any encouragement for applicants from under-represented groups. The FF sometimes advertised anonymously, because of what they have called the 'potency of the organisation's name'.
- *Shortlisting and interviewing:* the size of selection panels varied from two to three, and the FF tried to ensure some balance between men and women, but not ethnic groups, on its selection panels. The same people were not always used for shortlisting and interviewing. All panel members received diversity and selection training, and the FF used an external consultant for advice on its selection policies. All job documentation was retained for six months.
- *Selection criteria:* the FF was satisfied that its criteria and tests were strictly job-related, appropriate in every case and would not have an adverse impact on any ethnic group.

- *Monitoring*: the FF monitored all stages of the process by ethnic group. However, it did not provide any data.

Leavers

The FF did have a formal procedure for holding exit interviews and a form that included questions about equality of opportunity. It said that no concerns had emerged as a result.

Promotion and training

Selection for promotion was based solely on ability, and was regulated by a formal internal application process, with interviews. Training requirements and opportunities were identified through individual personal development plans. The FF did not monitor the take-up of promotion and training opportunities by ethnic group. All staff had received 'some' diversity training, and the FF was planning to develop this 'over the coming months'.

Board of directors/council

The FF's six trustees were all White British. Trustees were nominated by the FF's funding partners (two by the FA, two by the Premier League, one by Sport England and one by the Department of Culture, Media and Sport), and there was no limit to the length of their appointment.

Procurement

The FF said it did not check the equal opportunity practices of external providers of services when awarding contracts.

Funding

The FF was revising its targets for a new operational plan. It estimated that 15% of its funding programme had gone to organisations working to benefit ethnic minority communities and it was collecting information that would enable it to see what difference the funding had made.

3

Conclusions

Although the nature of the questionnaire (see Appendix 1) made it extremely difficult to carry out a full and in-depth analysis of every issue, it was possible to compare commitment to racial equality with practice in the various organisations charged with promoting and organising football. Therefore, although it has not been possible to provide a definitive overview of racial equality in football, our analysis does point to inconsistencies between organisations in their approach to racial equality issues, and in their ability to translate policies into actions that tackle racism and promote racial equality.

The football industry

- Drawing on earlier research, we know that Association Football in England has a long history and a following far in excess of those who work in the industry. For many, it is a life-long passion, as players and/or spectators (or, more likely, as ‘supporters’, for whom the first club they ever support becomes ‘their team’ for life). Traditionally, the football fan was white, male and working-class. Latterly, this has begun to change, and now football fans come from all parts of the community. There is a strong emphasis now on attracting comfortably-off middle-class audiences, especially to Premier League clubs offering all-seater stadiums at high ticket prices. Nevertheless, the majority of the audiences at matches are still white and male. The number of ethnic minority spectators attending matches is well below the number that might be expected from the proportion of ethnic minorities in the UK population, especially when considering the location of football club grounds – many are in areas of high ethnic minority populations. However, the wider following for the sport through television audiences and supporters’ groups now encompasses all ethnic and socio-demographic groups.
- The traditional following of football seems to be reflected in the way in which many clubs are run (with the exception of playing staff, which is discussed later). Staff tend to come from the same market segment as they always have (Williams and Wagg, 1991) – plus a few younger upwardly-mobile executives – and clubs do not seem to be either surprised or alarmed at this prospect. For them, staff recruitment does not appear problematic, and staff turnover is very slow (Bradbury, 2002). It is, of course, conceivable that the old-fashioned business practices contribute to the general failure of the industry, when viewed in purely business terms (such as profitability, efficiency, financial planning, investment, innovation, and so on). However, for most ‘stakeholders’ of a club (directors, shareholders, staff and supporters) success on the field of play is what really matters, even in terms of

being a successful business. Indeed, even creditors will recognise that, if the club is successful on the field, their money is safer than if the club faces relegation, which can often lead to financial administration. Therefore, a club's effectiveness as a business tends not to be judged by yardsticks that are normally applied to business ventures, but rather by sports-related criteria.

- It is noticeable that all these businesses (invariably limited liability companies) call themselves 'clubs', a misnomer that nevertheless tends to be reflected in all their business practices, including employment, in all but a very few cases. The prevailing culture of the private voluntary sector club, whose measure of success is entirely focused on success 'on the field', still permeates what has become a significant commercial industry. However, like most sports, the mindset has not kept pace with the economic realities.
- In the case of professional players, the employment culture is very different. Players rarely have much involvement in running the club; they are usually on short, fixed-term contracts; they are paid salaries far in excess of the average wage for a man of their age (and frequently, far more than anybody else working at the club); they are recruited through a wide-ranging search; and, at 20%, there is a high proportion of black players, not only at senior level, but also in the young player 'academies'. However, despite this intensive recruitment, and undoubted success at finding and attracting young black players, there is an almost complete absence of Asian players at any level, or any age category. A small number of clubs do try to recruit players from Asian leagues, but generally the informal networks that clubs rely on are failing completely to have any effect on a sizeable section of the community. This failure might be understandable and an explanation more easily found (for example, socio-economic, geographical, educational, traditional, or simply prejudice) if it also applied to black players, many of whom have similar (although not identical) backgrounds. But the immense success in recruiting black players (something in the order of six times their national demographic profile) suggests more research and effort is needed in this area and that cultural differences and/or a failure of the scouting policies may be an important factor.
- Football has been plagued in the past by racism, notably in three forms:
 - on the terraces, aimed at spectators from ethnic minority groups, which inevitably discouraged these spectators from attending matches
 - from the terraces, directed at members of the 'opposing' team, ostensibly with a view to affecting their performance, but often with more sinister overtones
 - on the pitch, between players, usually under the guise of 'winding up the opposition'
- The Football Association, taking a lead from *Kick It Out*, has encouraged the professional clubs to wage a very successful campaign to eliminate all three of these evils from the professional game (Back et al, 1996, Johal, 2001) and, latterly, the CFAs have begun to take a firm stand against the third of these forms in 'grassroots' football (Long et al 2000) (the lack of spectators at this level makes the first

two points less significant at this level). These campaigns have been very successful, but have dominated the thinking of football clubs and organisations. It is clear that, for most respondents, these issues were all-important. Their own business practices had rarely, if ever, been given any consideration, and in responding to the questionnaire it was clear that many were answering questions from the wrong perspective – not what they did themselves, but what they did about other potential transgressors.

- The FA does not have a specific equal opportunities policy on refereeing and only 2.2% of referees said they were from an ethnic minority group. However, the FA does recognise that it has a shortage of referees and expects CFAs ‘to provide fair access to referee recruitment and training opportunities’.

National football organisations

- It is clear from the evidence provided that the FA has taken a strong lead in promoting racial equality in football. This should be recognised and applauded. However, even though it is committed to racial equality and has taken a number of initiatives, internally and externally, these have yet to make a significant difference. Some of the FA’s practices fall short of best practice and it is still an organisation dominated by white males (both in executive and non-executive posts).
- The model of good practice set by the FA is mirrored to an extent in the PFA. Both organisations have reached the preliminary level of the Sporting Equals Standard, and both are working towards the intermediate level. The FAPL is still some way behind both these organisations, despite its work in supporting and developing a racial equality standard for clubs with *Kick It Out*.
- The FL is in a more serious position, having to take its commitment to racial equality beyond a simple policy statement (the FL does not support *Kick It Out* financially).
- No national football organisation follows best practice in recruitment and selection, and ethnic minorities are still under-represented both among staff and council and board members.

Professional clubs

- The difficulties of racism ‘on the terraces’ have alerted professional clubs to long-standing problems in this area. Generally, the FAPL clubs are much more aware of their obligations and responsibilities than clubs in the other divisions.
- Professional clubs lower down the divisional structure tend to be less prepared and less organised to promote racial equality than those higher up the structure, but good and bad practice exists at every level of the professional game. Most clubs⁹

9. The nature of the questionnaire makes it impossible to give precise figures for findings, and this summary is, by necessity, qualitative in nature.

have an equal opportunities policy, but there is still very little information about how it is translated into action, beyond its publication in a staff handbook.

- Most clubs recognise that they do not attract ethnic minority spectators in proportion to the local or national demography (although many clubs appear uncertain as to the breakdown of the local population). A significant number of clubs have not taken any action to increase ethnic minority attendance or to make links with local ethnic minority communities, although many other clubs have worked with *Kick It Out*, Football In the Community and even local racial equality councils to tackle racism and encourage people from ethnic minority communities to attend matches.
- Most clubs said they had stewarding policies to tackle racism, but fewer said they monitored the effectiveness of those policies, with some clubs believing there was no need to do so. A majority of clubs said their stewards received anti-racism training: this is, in fact, part of formal NVQ training for stewards.
- Many professional clubs have poor recruitment and selection practice, with widespread use of informal methods of recruitment and little or no formal equality training for staff. There is also serious under-representation of ethnic minority staff in management and administration in the clubs.
- Board members in professional clubs are selected in a very opaque way in a majority of clubs, and boards, with few exceptions, are entirely white. However, as explained, one of the qualifications for being a member of a board is often a willingness to spend one's own money on the club – usually the culmination of having been a life-long follower of the club as a supporter.

Business culture

- Professional football is unusual in that most clubs (certainly those outside the FAPL) are not profitable in business terms, and the directors and other senior officers of the club receive less remuneration than many of the staff they employ. Indeed, in many cases, the directors are personally subsidising the club to enable it to function. In the 2001/02 season, only 28% of clubs made a pre-tax profit. In the FL, pre-tax profits for 2001/02 were £66 million. (This was before the collapse of ITV Digital, since when losses have increased dramatically: operating losses increased by 173%, and pre-tax losses by 227% in 2002/3 relative to the same period in 2001/2). The interim results for 2002/3 suggested that pre-tax profits for FAPL clubs slumped from average interim profits of £0.7 million in 2001/2 into losses of £3.3 million in 2002/3 (for further information, see *Annual Review of Football Finance*, published by Deloitte and Touche). This is in contrast to the usual business practice where directors, shareholders and senior management are financially the main beneficiaries of the business. Directors of professional clubs are often required to make a personal 'investment' (which they are often never able to withdraw) in the club, or stand as a guarantor for large sums of money. They are likely to have been recruited through personal networks and often declare that they have been 'life-

time supporters' of the club. It is unsurprising, therefore, that almost all of these directors came from a small segment of society: white, male, middle-aged, and comparatively wealthy.

- Clubs, on the whole, can be broadly divided into two categories – those 'owned' by a very small number of people (who tend to comprise the board) and those owned by a very large number of people (typically a plc) where election to the board is by the shareholders at a general meeting. Although it is likely that most clubs' constitutions permit co-option of board members (for example, in a non-voting capacity), this seems to be rarely or never exercised.
- The rates of pay for different sections of the clubs' workforce are another area where these organisations differ from most other businesses. In most clubs the highest paid workers are the professional players, who typically earn more than the board members, chief executive officers and team managers who employ them (although at FAPL level the salaries of senior management are still not inconsiderable). However, the allegiance of these players to the club is frequently short-term and they are likely to move to another club – effectively a business rival – before long. By contrast, many of the non-playing staff give long and outstanding service to a single club. They display a sense of loyalty to the club over and above that which may reasonably be expected by virtue of their employment contract – and, especially in the lower divisions, their rate of pay is not generous.
- This research has shown that, although there are significant numbers of black professional players, these players are not progressing into management in significant numbers.
- Clubs often employ large numbers of part-time staff, especially as stewards (but also for catering, retail, security, cleaning, maintenance, etc) on match days. Many of these staff share the same characteristics:
 - they are supporters of the team; and
 - they have been doing the job for a considerable length of time.

Their rate of pay is not likely to be generous, but is compensated by the opportunity to watch at least part of the match, and feel a sense of pride at 'belonging' to the club.

Regional variations

- When assessing the number of employees and others engaged in a club by ethnic group, it is important to recognise that the demographic profile of the country has significant regional variations. This will affect the catchment areas for staff and spectators for the professional clubs, and will also have a significant effect on the staff and voluntary council and board membership of CFAs. This could be further complicated when counties have both urban and rural dimensions, and the actual location of the county office could have further implications for recruitment.

County football associations and grassroots football

- CFAs rely very heavily on volunteers to run football, both within the county FA itself, and in the leagues, associations and clubs that are affiliated to them (see previous research, notably *Part of the Game?*). Throughout sport, volunteering is dominated by white, middle-aged (often retired) middle-class males. They have acquired the necessary administrative and management skills in the course of their careers, often have access and opportunity to communication networks, and feel comfortable in the environments in which they operate – frequently, alongside others who share a similar background, experience and interests.
- Others (women, young people, people from ethnic minorities, the disabled, and the socially disadvantaged) find it difficult (and often unattractive) to break into this group – although the members of the group are themselves oblivious to the barriers they present, and often frustrated at the ‘lack of help’ they think they get. Football is no different from other sport in this regard, and there are very few ethnic minority members of committees or councils (even though these often comprise 40 or more members). The CFAs themselves (and their constituent members) will often protest that ‘we have no barriers, everybody is welcome’, with the inevitable stalemate this produces.
- The tendency for FA and CFA committees to be dissimilar in make-up from the players is brought into sharp focus in the case of disciplinary issues. A player, perhaps black or Asian, probably in his or her late teens or early twenties, may come up against a disciplinary panel made up entirely of people from a different age group, a different socio-economic group and a different racial group. Whether the hearing is fair or not, it can result in dissatisfaction, with the player feeling he or she has not been treated justly (see *Part of the Game?* Long, Welch et al, 2000).

Summary

The research shows that, with some exceptions, the football industry has failed to address seriously racial equality issues. There is a striking disparity between the relatively high number of black footballers and the under-representation of ethnic minorities in boardrooms and governance arrangements of football clubs and national football organisations. It is also notable that there are hardly any Asian players at any age level. The vast majority of professional football league clubs do not provide equal opportunities training for their staff, and many clubs, particularly in the lower divisions, do not have an equality policy. There is very little formal monitoring of promotion and training opportunities by any of the football clubs that responded to the survey. No national football organisation follows CRE-recommended best practice in recruitment and selection.

It is crucial now to put effective action plans in place to tackle these issues. The CRE is committed to working with the football industry to achieve real change.

Appendix 1

The questionnaire for clubs

RACE EQUALITY QUESTIONNAIRE FOR CLUBS*

The purpose of this questionnaire is to help you identify areas of good practice and where there might be gaps which need to be filled to ensure the provision of equality of opportunity on racial grounds within the club. The questions cover a range of employment and other practices and seek some statistical information on ethnicity across a number of categories. We appreciate that some clubs may not have ready access to some of the information if systems are not in place to capture data but please do what you can to provide a comprehensive response. It would assist in our analysis if you could structure your response under the same headings and numbering system as in the questionnaire itself. Once an analysis has been completed we will produce a set of recommendations for discussion with clubs and governing bodies. See Appendix for a summary of the Commission's Code of Practice for the elimination of racial discrimination in employment. Please remember to include your contact details, email, telephone etc. We would appreciate receiving your response by 12th December 2003. It should be sent for the attention of:

Sheila Rogers,
Countries, Regions and Communities Directorate
Commission for Racial Equality
St Dunstan's House
201 Borough High Street
London, SE1 1GZ

* The questionnaires sent to other bodies were generally similar, differing only in certain details.

1. EQUAL OPPORTUNITIES POLICIES AND PROCEDURES

1.1 Do you have a written EO policy?

If so:

- a. what groups does it cover?
- b. how are existing and new staff made aware of it?
- c. does it include a commitment to take positive action to deal with under-representation?
- d. how often it is reviewed?
- e. how is its implementation monitored?

Please forward a copy with your response

1.2 If you do not have an EO policy is it your intention to draw one up?

1.3 Do you have procedures in place to deal with complaints of racial discrimination? What are these?

1.4 Do you have a harassment policy and procedures for dealing with complaints? If so please forward a copy.

1.5 Do you monitor complaints and their outcomes? If so, can you provide a breakdown by ethnicity of complaints upheld?

2. GENERAL WORKFORCE DATA

2.1 How many staff are employed in the following categories, by full-time and part-time:

- a. Management (i.e. non-coaching, Section Head and above)
- b. Administration
- c. Coaching (include community and elite coaching and academies)
- d. Other (please specify – for example, catering or stadium staff)

2.2 Do you monitor your workforce by ethnicity? If so, please specify the current breakdown against the categories in Appendix 1.

- 2.3 If not, please estimate what proportion of your workforce is from a black or minority ethnic background for each of:
- Management (i.e. non-coaching, Section Head and above)
 - Administration
 - Coaching (include community and elite coaching and academies)
 - Other (specify)
- 2.4 Can you specify for each workforce category the average length of service by ethnic group?
- 2.5 If you currently do not monitor for ethnicity do you plan to introduce such a system and, if so, when?

3. RECRUITMENT AND SELECTION POLICIES AND PROCEDURES

The following questions relate to the main stages in the recruitment and selection process.

- 3.1 **Job documentation**
- Are job descriptions prepared for each vacancy?
 - Are personnel specifications prepared for each vacancy?
 - Do you use a standard application form?
- 3.2 **Advertising**
- Where do you advertise vacancies?
 - Are informal methods of recruitment (eg word of mouth) used?
 - Do you include an equal opportunity statement in job advertisements?
 - Do your advertisements specifically encourage applicants from any under-represented group?
- 3.3 **Shortlisting and interviewing**
- How many people are usually on your selection panels?
 - Do you try to ensure a gender and ethnicity balance on panels?
 - Do you use the same panel for both shortlisting and interviewing?
 - Are all panel members trained on selection methods and equality issues?
 - Do you retain all job documentation?

3.4 **Selection criteria**

- a. Are you satisfied that selection criteria and tests are:
 - i. strictly job-related
 - ii. appropriate in every case
 - iii. will not have an adverse impact on any particular group

3.5 **Monitoring**

- a. Do you monitor by ethnicity:
 - i. applicants for posts
 - ii. those shortlisted
 - iii. those selected/appointed
- b. Has the monitoring shown up any differential impact by ethnicity and what action has been taken?

4. LEAVERS

- 4.1 Do you conduct exit interviews?
- 4.2 If so, do the interviews include questions on the provision of equal opportunities?
- 4.3 If so, have any equal opportunities issues been identified as a result and what action has been taken?

5. PROMOTION AND TRAINING

- 5.1 How are people selected for promotion? (for example, internal competition, regarding, appraisal, management decision etc)
- 5.2 How are people selected for training opportunities?
- 5.3 Do you monitor promotions and training take up rates by ethnicity?
- 5.4 If so, have they shown up any differential impact by ethnicity?
- 5.5 Are staff provided with equal opportunities training?

6. BOARD OF DIRECTORS

- 6.1 How many Directors are on the club's Board?
- 6.2 What is the ethnic breakdown of the current Board using the categories contained in Appendix 1? If this isn't possible can you provide an estimate?
- 6.3 For what length of term are Directors appointed?
- 6.4 What selection procedure is used to fill Board vacancies?

7. PLAYING STAFF

- 7.1 Using the categories in Appendix 1 please specify the ethnicity of the club's professional footballers.

8. ACADEMIES

- 8.1 Using the categories in Appendix 1 please specify the ethnicity of the current:
- a. under-16 age group
 - b. over-16 age group
- 8.2 Do you have an equal opportunities element in your scouting policy? If so, please forward a copy.
- 8.3 What measures do you take to ensure that you reach all communities when recruiting for academies?

9. PROCUREMENT

- 9.1 What steps do you take to ensure equality of opportunity when procuring human resource services, such as catering and stewarding?
- 9.2 What steps do you take when procuring other services (for example, transport, printing) to ensure that contractors operate good practice in relation to equality of opportunity?

10. CROWD AND LOCALITY DEMOGRAPHICS

- 10.1 What is the ethnic makeup of the location in which your club is situated?
- 10.2 What do you estimate to be the average black and ethnic minority attendance at matches?
- 10.3 Have you undertaken any initiatives to increase black and minority ethnic attendance? If so what has been done and has it been successful?
- 10.4 What local links have been established with black and ethnic minority communities in your locality?

11. STADIUM MANAGEMENT POLICIES AND PROCEDURES

- 11.1 What policies are in place to deal with racist behaviour at matches?
- 11.2 Is the effectiveness of these policies monitored?
- 11.3 If so, what have the results shown?
- 11.4 If not, do you have plans to introduce monitoring and, if so, when?
- 11.5 Do stadium staff receive anti-racist training?

Appendix 2

Population of England and Wales, by region and ethnic group

Overall population of England and Wales by main ethnic groups

Area	All people	White (%)	Mixed race (%)	Asian (%)	Black (%)	Chinese & other (%)
North East	2,515,442	97.62	0.49	1.34	0.16	0.41
North West	6,729,764	94.43	0.94	3.42	0.62	0.60
Yorkshire & Humber	4,964,833	93.48	0.91	4.49	0.69	0.44
East Midlands	4,172,174	93.48	1.04	4.05	0.95	0.49
West Midlands	5,267,308	88.74	1.39	7.32	1.98	0.58
East	5,388,140	95.12	1.07	2.26	0.90	0.65
London	7,172,091	71.15	3.16	12.09	10.91	2.70
South East	8,000,645	95.10	1.07	2.33	0.71	0.78
South West	4,928,434	97.71	0.76	0.67	0.43	0.45
England	49,138,831	90.92	1.31	4.57	2.30	0.89
Wales	2,903,085	97.88	0.61	0.88	0.25	0.40

Appendix 3

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