



SWANSEA CITY ASSOCIATION FOOTBALL CLUB LIMITED

Drafted in partnership with Swansea City Community Trust

Equality Policy

Approved By:  SCAFC

Date: 30.10.17.

Approved By: Helen Elton SCCT

Date: 30.10.17



Document History

Revision History

The latest revision can be found at the top of the list

Revision Date	Author	Version	Summary of Changes
October 2017	Lucy Norman	V1.1	Revised Version
March 2016	Nicola Butt	V1.0	First Publication

Approvals

This document requires the following approvals:

Name	Version	Date of Approval
SCAFC – Leigh Dineen	V1.1	

Alternative Formats

If you would like this policy in an alternative format please contact the Club's Equality Manager. Contact details can be found at the end of the policy.



Equality Statement

'Swansea City AFC is committed to promoting equality of opportunity to everyone who wishes to be involved in the Club. The Club is committed to avoiding and eliminating unfair discrimination of any kind and will, under no circumstances, condone unlawful discriminatory practices. The Club strives to ensure it provides an environment where everyone's rights, dignity and individual worth is respected'

- Swansea City AFC Board of Directors

Swansea City AFC ("The Club") is committed to promoting equality of opportunity to everyone who wishes to be involved in the Club, whether as players, fans, employees, volunteers, Board members, contractors, suppliers, job applicants, participants of the Community Trust programmes and all others engaged with the Club's activities.

The Club strives to ensure everyone who wishes to be involved within the Club in whichever capacity has a genuine and equal opportunity to participate to the full extent of their own ambitions and abilities, without regard to their age, disability, gender reassignment, marital or civil partnership status, pregnancy or maternity, race, religion, belief, sex or sexual orientation.

All those involved within the Club can be assured of an environment in which their rights, dignity and individual worth is respected, and in particular that they are able to enjoy their engagement at the Club without the threat of intimidation, victimisation, harassment, bullying and abuse.



Legal Obligations

Equality Act 2010

Under the Equality Act 2010, in the United Kingdom it is potentially unlawful to discriminate in relation to age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, gender or sexual orientation, which are known as Protected Characteristics. This means that individuals will be protected if they have a Characteristic, are assumed to have one or more, associate with someone who possesses one or more or are with someone who is assumed to possess one or more Characteristic(s).

Swansea City AFC is committed to avoiding and eliminating unfair discrimination of any kind within the Club, and will, under no circumstances, condone unlawful discriminatory practices. The Club takes a zero-tolerance approach to discrimination, indirect and associative discrimination, discrimination by perception, harassment or victimisation.

Modern Slavery

Swansea City AFC has a zero-tolerance approach to modern slavery and is committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery and human trafficking throughout our supply chains and other business contacts, consistent with our disclosure obligations under the Modern Slavery Act 2015. By promoting equality throughout the organisation, more workers will be protected and service users will have greater confidence in the goods they buy and services they use.

Data Protection

Swansea City AFC ensures that any personal information disclosed to us through the Equality Monitoring audits which are regularly undertaken will be treated in such a way as to comply with our Data Protection Policies and Procedures (drafted in line with the existing Data Protection Act 1998 and the General Data Protection Regulation which comes into force in May 2018).



Responsibility and Implementation

The Board of Swansea City AFC will be accountable for ensuring the implementation of this policy and receive regular updates on Equality and Diversity matters at every Board meeting and interim Senior Management meetings. In addition to this, Swansea City AFC employees recognise their individual responsibility for the day to day implementation of equality at the Club, as per their individual employment contracts, new-starter inductions and subsequent training.

The following steps will be taken to publicise this policy and promote equality in Swansea City AFC:

- A copy of this document will be published on the Swansea City AFC website and be made available in multiple formats on request;
- The Swansea City AFC Board will take overall accountability for ensuring that the policy is observed;
- The Board will take full account of the policy in arriving at all decisions in relation to activities of Swansea City AFC;
- Swansea City AFC will implement regular audits, surveys or other initiatives designed to assess the level of participation of individuals or groups who possess one or more Protected Characteristic
- Swansea City AFC will take account of the audits findings in developing measures to promote and enhance equality in the Club, as well as inform their overall Equality Action Plan (Appendix 1)
- Swansea City AFC will develop a rolling programme of training for all players, staff, fans, Board members and participants of its Community Trust programmes in order to raise awareness of both collective and individual responsibilities.



Monitoring and Evaluation

The Equality Manager will review Club activities and initiatives against the aims of the policy and will report formally on this issue to the Board annually.

Swansea City AFC's Legal Counsel and Equality Manager will review the policy at intervals of no more than one year, (or when necessary due to changes in legislation) in line with the Club's policy review process.

Complaints and Compliance

Swansea City AFC considers all forms of discriminatory behaviours, including (but not limited to) behaviours described in Appendix 2, as unacceptable, and is concerned with ensuring individuals feel able to raise any bona fide grievance or complaint related to such behaviour without fear of being penalised for doing so.

Appropriate disciplinary action will be taken against any players, fans, employees, volunteers, Board members, third-parties, participants of the Community Trust programmes and all others engaged with the Club's activities that violate this Equality Policy.

Any person who believes that they have been treated in a way that they consider to be in breach of this Policy by a player, member of staff (both within Swansea City AFC and the Community Trust), fan, Board member, third-party or any other person engaged with the Club's activities should consult Appendix 3 for guidance on reporting discrimination.

An appointed person or persons of Swansea City AFC will investigate all formal complaints and the investigation will be conducted impartially, confidentially, and without avoidable delay.

Any person against whom a complaint is made will be informed of what is alleged and given the opportunity to present their side of the matter.



The parties in question will be notified of the outcome of the investigation in writing. If the investigation reveals unacceptable discriminatory behaviour, the Club will follow the necessary procedures and may impose sanctions on that person or persons in line with its policies as per Appendix 3.

In the event that an individual or organisation associated with Swansea City AFC is subject to allegations of unlawful discrimination in a court or tribunal, the Swansea City AFC Board will cooperate fully with any investigation carried out by the relevant lawful authorities.

Equality Action Plan

Swansea City AFC's Equality Action Plan (Appendix 1) demonstrates our commitment to achieving significant positive change across the company and wider community over the coming three years and beyond. We anticipate the achievement of these objectives will result in meaningful improvements for all service users, volunteers, Community Trust participants, employees, partner companies, contractors, suppliers and players, whilst also ensuring full compliance with the Equality Act 2010.

Our four key equality objectives are rooted within the overall direction of the Company and the Directors priorities to ensure that they are achievable and relevant. These objectives are monitored regularly by the Equality Lead, Human Resource Manager, Board of Directors as well as the Club's Equality and Inclusion Advisory Group. A summary of overall progress is included in our Company's annual reports.



Appendix

1. Equality Action Plan
2. Forms of Discrimination
3. Reporting Discrimination
4. Key Contacts



Appendix 1 – Equality Action Plan

Service users, volunteers, Community Trust participants, contractors and suppliers can view a redacted version of Swansea City AFC's equality objectives as laid out in the Equality Action Plan (Aug '17 – Jul '20) by visiting our website. Alternatively, staff can request the full, unredacted version of the Equality Action Plan via the Club's HR system.

Appendix 2 – Forms of Discrimination

The below are intended as representative descriptions of discrimination and should be treated as such. For a full legal definition, please consult The Equality Act 2010 or click [here](#) for further information from the Equality and Human Rights Commission.

Direct Discrimination

Direct Discrimination is a type of discrimination that occurs where, because of a protected characteristic, a person 'A' treats another 'B' less favourably than 'A' treats or would treat others.

Indirect Discrimination

Indirect discrimination occurs where 'A' discriminates against another 'B' if A applies to B a provision, criterion or practice which is discriminatory in relation to a relevant protected characteristic of B's.

A provision, criterion or practice is discriminatory in relation to a relevant protected characteristic of B's if:

- A applies, or would apply, it to persons with whom B does not share the characteristic;
- It puts, or would put, persons with whom B shares the characteristic at a particular disadvantage when compared with persons with whom B does not share it;



- It puts, or would put, B at that disadvantage, and;
- A cannot show it to be a proportionate means of achieving a legitimate aim

Associative discrimination

Discrimination can also occur when someone discriminates against someone because they associate with another person who possesses a protected characteristic. An example of this is if 'A' does not give 'B' – a job applicant, for example – the position, even though they have met all of the competencies for the role, just because 'B' has told 'A' they have partner with one or more Protected Characteristics.

Discrimination by perception

Discrimination by perception can occur when someone discriminates against an individual because they think they possess a particular protected characteristic and this applies even if the person does not actually possess that characteristic. An example of this is if 'B' is selected for redundancy by 'A' because they perceive 'B' to have a progressive condition i.e. they are disabled.

Harassment

Harassment and bullying bear striking similarities, but are distinct under the Equality Act 2010. Unless bullying amounts to conduct defined as harassment in the Equality Act 2010, it is not covered within the Club's Equality Policy. Employees who believe they are being bullied should consult the Club's Anti-harassment and Bullying Policy

Harassment is when 'A' engages in unwanted conduct related to a protected characteristic (or of a sexual nature) that has the purpose or effect of violating 'B's' dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for 'B'. Whether the conduct has that effect is judged subjectively from 'B's' viewpoint, subject to a test of reasonableness.



Third party harassment can also occur when an employee is harassed by someone who does not work for the company such as a customer, visitors, client, contractor or visitors from another organisation. Employers have a duty to protect employees who they know has been harassed on two or more occasions by someone and must take reasonable steps to protect the employee from further harassment.

Victimisation

Victimisation is where a person 'A' treats another person 'B' unfavourably because 'A' knows or suspects 'B' has done or intends to do a protected act. Protected acts include bringing discrimination proceedings, giving evidence or information in connection with discrimination proceedings, making an allegation of unlawful discrimination, or doing anything else under, or by reference to, discrimination legislation.

Appendix 3 – Reporting Discrimination

Service Users

A service user is defined as a customer or patron of Swansea City AFC or Swansea City Community Trust.

Swansea City AFC strives to create an inclusive, welcoming and safe environment for all service users and provide services in a fair and equitable manner. The Club actively encourages service users to report any discriminatory behaviour for investigation in line with the Club's complaint procedure which is available from our website.

Club or Community Trust Employees or Volunteers

An employee is defined as an individual who works part-time or full-time under a written contract of employment who receives a wage or salary and has recognised rights and duties.

Swansea City aims to ensure that all employees are valued equally and supported to reach their full potential. Towards this end, Swansea City AFC has dedicated policies and



procedures in place to deal with incidents of discrimination relating to a member or members of staff. Staff members who believe that have been directly or indirectly discriminated against either by third parties or fellow employees should refer to Swansea City's Discrimination Reporting Procedure for further detail.

Third-parties

Examples of third-parties may include, but is not limited to, contractors, suppliers, consultants, agents and partner organisations.

Swansea City AFC prioritises professional working relationships throughout the organisation and as such, has a procedure in place to deal with incidents of discrimination from third parties should they arise. Third parties who believe that have been directly or indirectly discriminated against should refer to Swansea City's Discrimination Reporting Procedure for further detail. Alternatively, employees who feel

Job Applicants

Swansea City AFC values diversity and works to ensure there are no barriers to anyone possessing one or more Protected Characteristics from applying for a vacancy with either the Club or Swansea City Community Trust. Applicants should refer to the Club's Recruitment Policy, which is available on our website, if they believe they have been discriminated against during the application process.

Players

As with all others associated with the Club, Swansea City AFC seeks to protect players from discrimination and ensure they feel empowered to challenge any discriminatory behaviour.

If an incident(s) occur during a match, players should immediately report the incident to the Referee who controls the match in cooperation with the other match officials, or



one or more of the Match Officials. The Player should also inform a Club Official of the incident after the game.

If an incident(s) occur outside of a match, Players should immediately report it to the Football Administration Manager or Player Liaison Manager whose contact details can be found on the Players App. These managers will follow the Swansea City's Discrimination Reporting Procedure as detailed within the Staff Handbook.

Appendix 4 – Key Contacts

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