



# COUNTY IN THE COMMUNITY

## Providing Opportunities: Enhancing Lives Education – Health – Inclusion - Sport

### Equality, Diversity and Inclusion Policy

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# Equality and Diversity

Promoting a culture that actively values difference

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# 1. Purpose

- 1.1. The aim of the policy is to ensure
  - 1.1.1. fair recruitment and selection
  - 1.1.2. equal access to training opportunities
  - 1.1.3. equitable terms and conditions of employment
  - 1.1.4. appropriate provision of services for different sections of the community
- 1.2. County in the Community is committed to promoting equality and diversity and promoting a culture that actively values difference and recognises that people from different backgrounds and experiences can bring valuable insights to the workplace and enhance the way we work. County in the Community aims to be an inclusive organisation, where diversity is valued, respected and built upon, with the ability to recruit and retain a diverse workforce that reflects the communities it serves. Within this framework, County in the Community specifically refers to measures it has in place to provide equality of opportunity and the facilities that it can provide to its diverse workforce and job applicants.
- 1.3. County in the Community is also committed to compliance with relevant equality legislation, the Equality Act 2010, Codes of Practice and relevant best practice guidance. This policy pursues and builds on the statutory position to ensure effective policies and practice of promoting equality.
- 1.4. County in the Community aims to pro-actively tackle discrimination or disadvantage and aims to ensure that no individual or group is directly or indirectly discriminated against for any reason with regard to employment or accessing its services.
- 1.5. However, County in the Community is also mindful of the provision in discrimination law for the rare circumstances when an organisation may need to justify discrimination rather than have a disproportionate effect. This could be, for instance, where there is a conflict with other legislation that County in the Community has to comply with or between service needs. In such circumstances County in the Community is committed to following the required proper assessment and objective justification of any decision in order to demonstrate that the provision, criterion or practice is a proportionate means of achieving a legitimate aim.

- 1.6. Issues regarding harassment and bullying are covered in the Harassment, Bullying and Discrimination Policy. For issues regarding recruitment refer also to the Recruitment policy.
- 1.7. This policy should be read in conjunction with the equality, diversity and inclusion action plan (see appendences).

## 2. The Definition of Equality and Diversity

- 2.1. Equality can be described as breaking down barriers, eliminating discrimination and ensuring equal opportunity and access for all groups both in employment and to goods and services; the basis of which is supported and protected by legislation.
- 2.2. Diversity can be described as celebrating differences and valuing everyone. Each person is an individual with visible and non-visible differences and by respecting this everyone can feel valued for their contributions which is beneficial not only for the individual but for County in the Community.
- 2.3. Equality and Diversity are not interchangeable but interdependent. There can be no equality of opportunity if difference is not valued and harnessed and taken account of.

## 3. Scope

- 3.1. This policy applies to direct employees of County in the Community, volunteers, workers (engaged through, or by, a partner organisation and supplied to County in the Community on a temporary basis), and all job applicants regarding recruitment.
- 3.2. Where County in the Community services are provided by external contractors or third parties on the basis of a specification set by County in the Community, these contractors or third parties are responsible for adhering to County in the Community's Equality and Diversity Policy whilst providing services on behalf of County in the Community.
- 3.3. This policy applies also to sub-contractors. County in the Community will monitor the performance of contractors and/or third parties and take all necessary steps to ensure good performance and compliance with appropriate behaviours. However, if any issues become apparent with regards to diversity or equality in relation to any contractor or third party, these will be taken very seriously by County in the Community and raised in the strongest possible terms with the contractor or third party.

## 4. Policy Statement

4.1. We are committed to the achievement of equal opportunities; this is central to our mission. It is unlawful to discriminate directly or indirectly in recruitment or employment because of any of the nine "protected characteristics" as defined by the Act. These are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

We also recognise that the Equality Act 2010 makes it unlawful for staff to discriminate directly or indirectly, or harass customers or clients because of the protected characteristics of age, disability, gender reassignment, pregnancy and maternity, marriage or civil partnership, race, religion or belief, sex, and sexual orientation.

4.2. We believe discrimination, either direct or indirect as defined in law, is unacceptable and we will not tolerate it.

4.2.1. We will not tolerate discrimination or harassment against an individual because they are associated with another individual who has a protected characteristic.

4.2.2. We will not tolerate discrimination or harassment against an individual on a perception that the person has a particular protected characteristic.

4.2.3. We will not tolerate discrimination or harassment of any of our employees or volunteers by third parties such as clients or customers.

4.2.4. We will not tolerate the victimisation of any employee or volunteer because the person has made or supported a complaint or raised a grievance under the Equality Act 2010, or because the person is suspected of doing so, or being about to do so.

4.3. However, our policy is not limited to the minimum standards imposed by the law. We are committed to achieve best practice in the area of equal opportunities. Everyone who is or who seeks to be a member of staff or volunteer of County in the Community is entitled to receive equality of opportunity and treatment that is appropriate and fair irrespective of:

- age
- colour
- disablement
- marital status
- race/ethnicity

- religion
- sex
- gender
- employment status
- sexual orientation
- nationality
- caring responsibility
- socio-economic status
- other unjustifiable factors

This list is not exhaustive.

- 4.4. We will be proactive in all matters relating to equality of opportunity and diversity. We value and will celebrate the richness brought to our organisation by a diverse population, both of staff and clients. We recognise and will seek to reflect the positive contributions brought to County in the Community by the variety of its staff.
- 4.5. We are committed to:
- 4.5.1. Creating an environment in which individual differences and the contributions of all our staff are recognised and valued.
- 4.5.2. Every employee is entitled to a working environment that promotes dignity and respect to all. No form of intimidation, victimisation, bullying or harassment will be tolerated.
- 4.5.3. Training, development and progression opportunities are available to all staff and volunteers.
- 4.5.4. Equality in the workplace is good management practice and makes sound business sense.
- 4.5.5. We will review all our employment practices and procedures to ensure fairness.
- 4.5.6. Breaches of our equality policy will be regarded as misconduct and could lead to disciplinary proceedings.
- 4.5.7. This policy is fully supported by the senior management team.
- 4.6. The policy will be monitored and reviewed annually.
- 4.7. We also recognise that the behaviours through which diversity is evident must be consistent with the values that underpin this policy document.
- 4.8. Additionally, we recognise that despite our best intentions circumstances may arise where we fail to provide an appropriate and professional service to people, consistent with the aims of this policy. We are committed to take action in such circumstances.
- 4.9. The Equality and Diversity policy provides a clear framework for translating our policy into action. It outlines the responsibilities of the Board, Chief Executive Officer, managers and individuals to comply with the Equality Act 2010.

## 5. Implementation

- 5.1. County in the Community will have policies and procedures that support and uphold this equal opportunity policy. As a result, everyone can expect to be treated with fairness and for judgements to be made that respect their human rights and ensure natural justice. Decisions will be made with integrity following a process based upon transparent criteria.
- 5.2. County in the Community will take action to communicate this policy to all staff, volunteers and others e.g. visitors, clients, contractors and suppliers of goods and services involved in its activities. We will continue to develop and implement programmes to ensure that all staff have received appropriate training to enable them to fulfil their responsibilities under this policy.
- 5.3. Consultation with and involvement of a wide range of stakeholders will be essential for ensuring that our equal opportunities policy and practice is effective. We also need to ensure that we gain feedback to ensure that the practical impact of our policy and practice does not result in unintended or unfair discrimination or in consequences that are contrary to the aims of this policy.
- 5.4. County in the Community will develop policies, codes of practice and guidance to deal with specific aspects of the implementation of this Policy. These developments will take place against a clear and published action plan.
- 5.5. County in the Community will ensure that our future facility allows easy access for all (physical disabilities etc).
- 5.6. County in the Community have an annual working calendar to ensure staff know about awareness days/weeks and specific religious dates that the charity will look to celebrate.

## 6. Employment

- 6.1. County in the Community believes it must recruit the best person for the job and that discrimination prevents this from happening.
- 6.2. Because of past and existing discrimination, some people have missed out on chances to obtain qualifications or gain experience. This, in turn, can lead to restricted job and training opportunities, and further disadvantages already affected by discrimination. This means that some people are not able to compete for jobs on equal terms. Likewise, organisations may have inadvertently developed systems

and styles of working which can prevent some people from achieving their full potential.

- 6.3. County in the Community's Equalities and Diversity Policy is there to assist in the elimination of discrimination and ensure fair treatment for all employees by:
  - 6.3.1. advertising all jobs in appropriate ways to ensure the widest possible response from all sections of the community
  - 6.3.2. examining recruitment procedures regularly to ensure people are selected on their abilities and merits
  - 6.3.3. offering fair terms and conditions of employment to employees
  - 6.3.4. ensuring facilities and practices are supportive of employees with family responsibilities
  - 6.3.5. providing equipment and facilities to enable people with a disability to obtain a job or continue working with County in the Community.
- 6.4. County in the Community has developed a Recruitment and Selection Policy. Senior Staff receive training in the application of this policy to ensure that they are aware of its content and provision.

## 7. Training

- 7.1. Training will play an important role in assisting Trustees, staff and volunteers to implement County in the Community's Equalities and Diversity Policy and in developing employees' skills and potential.
- 7.2. All Trustees, staff and volunteers will receive training on Equalities and Diversity as part of their induction and within one month of joining our organisation and at least once every two years thereafter.
- 7.3. All managers responsible for recruitment and selection will undertake additional Equalities and Diversity Training. The purpose of training will be to:
  - 7.3.1. inform employees of the purpose of the Equalities and Diversity Policy
  - 7.3.2. provide employees, especially managers, with the skills and knowledge necessary to implement the policy
  - 7.3.3. encourage and enhance the skills of employees, particularly those who have traditionally been under-represented in the workforce.
- 7.4. All employees will need to show that they:



- 7.4.1. understand their workplace responsibilities as stated by the Equality Act 2010.
- 7.4.2. have knowledge of the protected characteristics that are covered by the law.
- 7.4.3. understand what is meant by discrimination and be able to recognise the different types.
- 7.4.4. understand what is deemed as prohibited conduct within the Equality Act.
- 7.4.5. be aware of the importance of equality and diversity training so that the workplace can become more open and understanding.
- 7.4.6. County in the Community will keep written records of equality, diversity and inclusion training including dates, attendance and matters covered by the training. This will form part of the equality, diversity and inclusion action plan.

## 8. Responsibility

- 8.1. All members of County in the Community's staff will take responsibility for their actions.  
Specifically:

### **The Board, are responsible for:**

- Providing leadership on the equality and diversity strategy and policy, acting as overall champions to ensure the policy is implemented;
- Communicating the strategy and policy, internally and externally;
- Strategic engagement with and accountable to the relevant bodies and the public.

### **Equality and Diversity Lead is responsible for:**

- Developing employment policy and strategy on equality and diversity;
- Providing guidance to line managers and staff;
- Supporting managers in investigating issues relating to potential discrimination, including those matters concerning members of the general public who visit County in the Community;
- Monitoring employment policies and practices;
- Championing the issues, internally and externally;
- Facilitating training and development initiatives on equality and diversity.

### **Managers at all levels are responsible for:**

- Implementing the policy as part of their day-to day management of staff and in applying employment policies and practices in a fair and equitable way
- Ensuring equality and diversity issues are addressed in performance.
- Ensuring all staff act in accordance with the equality and diversity policy providing necessary support and direction;

- Effectively manage and deal promptly when investigating issues relating to potential discrimination, including those matters concerning members of the general public who visit Newport Count AFC;
- Ensuring all policy or service decisions that will change provisions, practices or policies and affect the workforce are Equality Impact Assessed as required.

**Each employee and volunteer is responsible for:**

- Implementing the policy in their day-to-day work and their dealings with colleagues, readers and visitors;
- Ensuring their behaviour is appropriate to the policy and that they treat people with respect and dignity;
- Not discriminating against other employees or service users
- Notifying their line manager of any concerns with regard to the conduct of other employees, service users, the public or third parties.

- 8.1.1. The overall managerial responsibility for equal opportunities lies with the Board.
- 8.1.2. All managers and supervisors are responsible for ensuring that this Equalities and Diversity Policy is implemented in their areas of responsibility.
- 8.1.3. The Equality and Diversity Lead is responsible for taking action in relation to equal opportunities in employment matters, for monitoring the effectiveness of the policy and for ensuring appropriate provision of supportive staff development.
- 8.1.4. All employees are responsible for ensuring that they act at all times in a way that is consistent with our Equalities and Diversity policy. Individuals may be personally accountable should any complaint arise or in respect of breaches of policy.
- 8.1.5. People not employed by County in the Community but who play a part in its activities, e.g. visitors, clients, contractors and suppliers of goods and services will be made aware of our expectation that they will operate within the scope of this policy. For large procurement contracts, we will expect contractors and suppliers to demonstrate their commitment through evidence of their own equal opportunities policy.

## 9. Responding to feedback

- 9.1. County in the Community is committed to respond positively to constructive criticism and complaint in relation to equal opportunities. We recognise that making complaints and expressing concerns in relation to equal opportunities can be challenging. We will, therefore, develop specific advice and support to enable staff and volunteers to put forward their concerns effectively.

- 9.2. We will take appropriate action to protect staff from discriminatory behaviour by any individual(s) within the organisation, or in the course of their duties. Allegations of discriminatory behaviour on the part of staff will be dealt with under the appropriate disciplinary or grievance procedure.

## 10. Work/life balance

- 10.1. County in the Community is committed to employees who have commitments outside work, irrespective of whether they have caring responsibilities. County in the Community is committed to helping its employees fulfil their potential at work whilst finding the right work/life balance
- 10.2. County in the Community aims to improve the working lives of its employees by having a framework of policies such as the Right to Request Flexible Working, Special Leave to help with caring responsibilities and domestic emergencies and Career Breaks.
- 10.3. County in the Community will ensure all staff have appropriate equipment that is relevant to their role and is equitable to support the work they are conducting.
- 10.4. County in the Community will look to deliver sessions/lessons with at least 2 members of staff and 1 volunteer present if possible, encouraging staff to support each other in their coaching/teaching practice.

## 11. Discrimination

- 11.1. Discrimination may take seven main forms and is defined in law along with the protective characteristics associated with each provision as listed below:
  - 11.1.1. Direct Discrimination occurs when someone is treated less favourably than another person because of a protected characteristic. Relevant protected characteristics include age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage & civil partnership, pregnancy and maternity. For example, a manager does not select a pregnant woman for promotion even though they meet all of the competencies because they are pregnant. This is direct discrimination and cannot be justified.
  - 11.1.2. Associative discrimination occurs when someone discriminates against someone because they associate with another person

who possesses a protected characteristic. Relevant protected characteristics include age, disability, gender reassignment, race, religion or belief, sex, sexual orientation. An example of this is when a manager does not give a job-applicant the role, even though they have met all of the competencies for the role, just because the applicant tells the employer they have a disabled partner. This is associative discrimination because of disability by association.

- 11.1.3. Discrimination by perception occurs when someone discriminates against an individual because they think they possess a particular protected characteristic. It applies even if the person does not actually possess that characteristic. Relevant protected characteristics include age, disability, gender reassignment, race, religion or belief, sex, sexual orientation. An example of this is when a manager selects a person for redundancy because they incorrectly think they have a progressive condition (i.e. that they are a disabled person). This is discrimination by perception because they believe the individual is disabled.
- 11.1.4. Indirect discrimination occurs when a seemingly neutral provision, criterion or practice that applies to everyone places a group who share a characteristic e.g. type of disability at a particular disadvantage. Indirect discrimination may be justified if it can be shown that the provision, criterion, or practice is a proportionate means of achieving a legitimate aim. An example of this is when an employer decides to apply a “no hats or headgear” rule to staff. If this rule is applied in exactly the same way to every member of staff, the staff who may cover their heads as part of their religion or cultural background (such as Sikhs, Jews, Muslims and Rastafarians) will not be able to meet this requirement of the dress code and may face disciplinary action as a result. Unless the employer can objectively justify using the rule, this will be indirect discrimination. Relevant protected characteristics includes age, marriage and civil partnership, race, religion or belief, sex and sexual orientation. In addition, the Act extends protection against unjustified indirect discrimination to gender reassignment and disability.
- 11.1.5. Dual Discrimination occurs when someone is treated less favourably because of a combination of two relevant protected characteristics. This means that it will be possible for an

applicant to claim that they have been treated less favourably not just because of their race but also because of their gender. For example, because the individual is an Asian woman. Relevant protected characteristics include age, disability, gender reassignment, race, religion or belief, sex and sexual orientation.

11.1.6. Detriment arising from a disability arises when you treat a disabled person unfavourably because of something connected with their disability. This type of discrimination is unlawful where the employer or other person acting for the employer knows, or could reasonably be expected to know, that the person had a disability. This type of discrimination is only lawful if the action can be justified and the employer can show that is a proportionate means of achieving a legitimate aim. An example of this when an employer imposes a “no beards” rule as a part of a dress code and tells staff they will be disciplined if they do not comply. An employee is a disabled person who has a skin condition which makes shaving very painful. They have been treated unfavourably (threat of disciplinary action) because of something arising from their disability (their inability to shave). Unless the employer can objectively justify the requirement, this may be a detriment arising from a disability. It may also be a failure to make a reasonable adjustment.

- 11.1.7. Victimisation occurs when an employee is treated unfavourably, disadvantaged or subjected to a detriment because they have made or supported a complaint of discrimination or raised a grievance under the Equality Act, this policy or the Harassment, Bullying and Discrimination policy or because they are suspected of doing so. (However, an employee is not protected from victimisation if they have maliciously made or supported an untrue complaint). An example, of this is when an employee requests to work flexibly and their manager refuses their request because they supported a colleague in a complaint of discrimination.
- 11.1.8. Third party harassment occurs when an employee is harassed by someone who does not work for the employing organisation such as a customer, visitors, client, contractor or visitors from another organisation and the general public. The employer will

become legally responsible if they know an employee has been harassed whilst carrying out any work-related duties.

## 12. Complaints of Discrimination

- 12.1. County in the Community takes all claims of discrimination very seriously and will take appropriate action against those concerned. Discrimination occurs when someone directly or indirectly treats a person or a group of people unfavourably because of a protected characteristic of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation. This covers all behaviour including remarks and insinuation, both verbal and non-verbal, which cause offence.
- 12.2. Any member of staff who is subject to harassment, bullying or discrimination is encouraged to refer to County in the Community's policy on Harassment, Bullying and Discrimination. This provides details of the steps that can be taken to deal with such an issue.
- 12.3. If a worker (engaged through, or by, an employment agency or bureau) considers they have been discriminated against they should raise their complaint directly with their employer.

## 13. People Strategy and Corporate Social Responsibility

- 13.1. County in the Community aims to be an ethical employer of choice and through its People Strategy aims to ensure its workforce are able to make a valuable contribution to the work of the organisation whilst ensuring we support our workforce's health and well-being of the workforce.
- 13.2. County in the Community aims to create a positive impact within the local, national and international communities. One of County in the Communities ethical aims is to improve the quality of life for our workforce, families and the local community.
- 13.3. Where appropriate, County in the Community actively encourages its employees to participate in local voluntary initiatives and may provide further support to initiatives, which encourage social inclusion.

## 14. Communication

- 14.1. The Equality and Diversity policy is available on the County in the Community website, County in the Community's Share Drive and a hard copy is available in the main office. Please contact the Equality and Diversity Lead if you require a copy in an alternative format.
- 14.2. The details of this policy will be proactively communicated and promoted to all current staff, volunteers and new starters.

## 15. Monitoring

- 15.1. The Equality and Diversity Lead, together with the Senior Management Team and nominated staff members, will review relevant performance indicators and will make regular reports to the Board. This report will review both progress against the action plan and make appropriate proposals for further development.
  - 15.1.1. Equality monitoring will be carried out to measure the effectiveness of County in the Community's Equalities and Diversity Policy, to check the policy is working and act as a basis for future plans.
  - 15.1.2. Monitoring information will only be used for this purpose and will be treated confidentially.
  - 15.1.3. We will maintain and review the employment records of all employees in order to monitor the progress of this policy.
  - 15.1.4. We will monitor recruitment and selection procedures to ensure discrimination is not occurring.
- 15.2. We will monitor and publish our progress on achieving greater Equality and Diversity, specifically:
  - 15.2.1. Demographic details of the board, staff, volunteers and participants
  - 15.2.2. Gender pay gap
  - 15.2.3. Pay ratio

## 16. Associated Handbooks & Policies

- Equality, Diversity and Inclusion Action Plan
- Trustee Handbook
- Employee Handbook