



Equality, Diversity & Inclusion Policy

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Document History

Revision History

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

Revision Date	Author	Version	Summary of Changes
July 2020	Nicola Butt	V1.2	Full Policy Review
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 – Trevor Birch SCAFC – Gareth Davies SCCT – Helen Elton	V1.2	August 2020
SCAFC – Leigh Dineen	V1.1	October 2017

Alternative Formats

If you would like this policy in an alternative format please contact the Liberty Stadium at support@swansecity.com or 01792 616606

Policy Statement

Swansea City AFC (the Club) 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.

The Club is committed to promoting equality of opportunity to everyone who wishes to be involved in the Club, whether as Players, Fans, Employees, Board Members, Job Applicants, Participants of the Community Trust 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.

All Club employees are provided with this policy at induction and are required to ensure their behaviour is consistent with this policy.

British Values

The Club promotes the British Values which underpin what it is to be a citizen in a modern and diverse Great Britain.

These values are defined as:

- Democracy
- The Rule of Law
- Mutual Respect and Tolerance for those with different faiths and beliefs
- Individual Liberty

Legal Obligations

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 harassment, victimisation, or bullying. Please refer to Appendix 1 for the relevant legislation and behaviours in question.

Implementation & Distribution of the Policy

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

This Policy is available to the follow groups:

- Club Employees via the HR Intranet and Induction
- Match Day Workers via the Match Day Handbook
- Community Trust Employees via Email
- External Individuals/Groups via the Club Website

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, internally and externally.

The Club will implement regular audits, surveys or other initiatives designed to assess the level of participation of different sections of the community in the Club, and will take account of the findings in developing measures to promote and enhance equality in the Club

This policy is available in various formats on request.

The Community Trust

As Swansea City AFC's registered charity, the Swansea City Community Trust is at the heart of the Club and at the heart of our local communities.

It was set up to improve the lives of individuals and neighbourhoods from Bridgend to Haverfordwest and everywhere in between. It does that through the delivery of year-round projects which are designed to have a very real and positive impact on people's lives.

A few of the Trust's projects are detailed below:

Premier League Primary Stars (PLPS) – Using the appeal of professional football clubs to inspire children to learn, be active and develop important life skills through the power of sport. The programme aims to develop the whole child by looking to improve their physical literacy, classroom engagement and develop a healthier more positive lifestyle.

This project has been delivered to over 5000 pupils. In 2019 18% (avg) pupils had increased confidence levels and over 40 teachers engaged in formal mentoring or CPD.

Every Player Counts / We Wear the Same Shirt - The Community Trust deliver two programmes across South West Wales, 'Every Player Counts'; funded by the EFL Trust and Wembley National Stadium Trust, and 'We Wear The Same Shirt'; an initiative delivered in partnership with the FAW.

'Every Player Counts' supports the EFL Trust's aim of increasing sports participation for all and covers a wide range of disabilities with the simple aim of getting more people involved in sport. Currently, people with disabilities are half as likely to take part in sport compared to non-disabled participants – the programme aims to break down some of these barriers to participation and encourage more disabled people to get involved.

The FAW-funded 'We Wear the Same Shirt' initiative is aimed at adults of all ages and abilities seeking to improve their physical and mental wellbeing. The weekly sessions provide a great opportunity to play football and socialise with others in a pressure-free, relaxed environment.

Girls Football - turn-up-and-play football sessions for girls aged seven to 12 in Pembrokeshire. This partnership aims to encourage young females to participate in football through fun sessions open to all abilities. The sessions will be provided by experienced and

qualified coaches in a welcoming and supportive environment in a bid to help young players discover a passion for the beautiful game, and eventually, become confident enough to join local club teams.

Recruitment & Selection

Equality is an integral part of our recruitment and selection process, and the Club requires all those who are responsible for recruitment at the Club to undertake the Club's Best Practice Recruitment Training.

The Club takes steps during its recruitment process to increase the diversity of its applicants, this may include:

- Placing job adverts to target particular groups, to increase the number of applicants from that group
- Include statements in its job adverts to encourage applications from under-represented groups
- Offering training, work placements or internships to help certain groups get opportunities to progress at work
- Hosting an open day specifically for under-represented groups to encourage them to get into a particular field

Advertisements are published across various channels in order to reach as many job seekers as possible. Advertisements are available in various formats on request, including but not limited to larger font and braille.

All advertisements include the following statement:

“The Company is an equal opportunities employer. The Company does not tolerate less favourable treatment of any employee or job applicant on any ground, including but not limited to gender, marital status, race, racial origin, nationality, national origin, religion or belief, disability, sexual orientation, gender reassignment, age, membership or non-membership of a Trade Union, pregnancy, childbirth, political affiliation, relationships in the workplace, or any other prejudice”

The Club aims to ensure that no job applicant suffers from discrimination because of any of the protected characteristics. The recruitment procedures are reviewed regularly to ensure that individuals are treated on the basis of their relevant merits and abilities.

All Club job advertisements avoid stereotyping or using wording that may discourage particular groups from applying.

All applicants are asked to complete an equal opportunity monitoring form when they apply for a position at the Club. The form is detached from the application form and used solely for monitoring purposes. Applicants who complete this form are assisting the Club to maintain equal opportunities best practices and identify barriers of workforce equality and diversity.

Promoting Equality

Each the Season the Club links with a charity to be its main charity partner for the duration of the season, which can include financial support.

The Club also dedicates each home fixture to a separate charity where they receive a news story on the Club's social channels and website, have a stand within the Jack Zone and bucket collections throughout the stadium.

Previous charities have included:

Matthews House	Alzheimers Society	GOLAU Cancer Foundation	Mind	Guide Dogs	Make-A-Wish
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The current main charity partner for the 2019-2020 season is [Hafal](#).

Hafal is an organisation that works with people recovering from serious mental illness, as well as their families, friends, and carers. The Club donated £5,000.00 to the charity and they will also be working closely with the Club's Charity, The Community Trust.

The Club activities on promoting equality are based around the 9 protected characteristics as well as additional disadvantaged groups.

Age

The Club understands the positive impact a diverse age range of employees will have on its business and encourages contributions of children, young people, and adults of different ages, across a range of its departments.

The Club does not have a default retirement age which contributes to ensuring ageing does not lead to reduced opportunities.

Disability

The Club recognises that disability can take many forms and can include physical, mental health, long-standing and fluctuating health conditions. The Club encourages job applications from disabled people and is a Disability Confident Employer.

The Club ensures that any individual recruiting on behalf of the business is aware and able to make reasonable adjustments for disabled applicants.

The Club has launched a number of initiatives to enable disabled supporters to attend the stadium in a safe and comfortable manner.

These include:

- Sunflower Lanyards – discreetly indicating to people around an individual that they may require additional support, help or a little more time.
- Diabetes Initiative – allowing diabetic supporters to take snacks/drinks into the stadium on match days
- Sensory Room- Launched in 2017, the sensory room provides supporters who may find the match day experience uncomfortable to come and enjoy the game at their own pace in a safe environment.
- Dedicated Quiet Hours – Providing a calm, less overwhelming environment for supporters to visit the Club Shop.

- Silent Tours – Stadium Tours done silently for individuals that may find loud noises uncomfortable.

Sex and Gender Reassignment

The Club is committed to increasing the number of females within its workforce and understands that women frequently experience social and economic disadvantages.

The Club aims to promote gender diversity within the businesses by:

- Ensuring job candidates with gaps in employment due to childcare are not disadvantaged
- Promoting its Homeworking and Flexible Working Policies

The Club recognises that people are subject to discrimination based on gender reassignment, or perceived gender reassignment, or because they are transgender.

Race

The Club is committed to ensuring every person, regardless of ethnicity or background, should be able to fulfil their potential at work. The Club recognises that individuals from ethnic minority backgrounds still face discrimination and are committed to increasing diversity amongst its workforce and attracting a wider more diverse talent pool during its recruitment process.

The Club continues its support for ‘Show Racism the Red Card’ and ‘Kick It Out’. Both campaigns are delegated a game each where they promote their cause, players wear their branded t-shirts and the programme provides educational information and guidance about the campaign and its cause.

The Club’s Academy has also worked closely with ‘Show Racism the Red Card’ to provide a clear message to its young players.

Religion & Belief

The Club recognises and respects the religion and/or beliefs held by its employees, including those of no religion or belief. The Club will at all times try to ensure that the needs and preferences of an individual’s religion and/or belief is met.

Upon request, the Club will provide a suitable room for prayer, meditation or quiet reflection and will take a flexible approach to allowing employees to exchange their bank holiday entitlements to alternative Holy Days of Obligation, such as Eid and Diwali.

Sexual Orientation

The Club believes all employees should have the right to be themselves at work without having to be concerned about sharing aspects of who they are. The Club is committed to supporting all individuals of the LGBTQ+ community.

The Club actively supports LGBTQ+ movements and awareness days such as Pride and Stonewall’s Rainbow Laces Campaign.

Marriage & Civil Partnership

The Club ensures that its policies and procedures do not put any individual at a disadvantage based on their relationship status. The Club recognises all forms of relationship, including people who are married in a legally recognised union, either an opposite-sex or same sex couple and people in a civil partnership between two people of the same sex or opposite-sex.

Pregnancy & Maternity

The Club supports employees returning from maternity leave in obtaining a work-life balance and will provide facilities for breast feeding/expressing on site.

The Club provides enhanced maternity/paternity and adoption pay and has designated Family Leave Policies.

Homelessness

The Club has a long standing relationship with Matthews House, a local charity who provide a warm and welcoming building in the heart of Swansea with the expressed intention to being accessible for the homeless and most vulnerable regardless of their background, beliefs or circumstances.

The Club has worked with Matthews House on several projects since it became an official Club Charity Partner in 2018. A few of which include:

- Employees undertaking volunteer work at its premises,
- Promotion of its Dignity Packs for vulnerable women and men across Swansea,
- Placing collection boxes throughout the Stadium during fixtures,
- Funding the cost of washing machines, dryers, and lockers for its laundry facility.

Most recently the Club has supported Matthews House during the Covid-19 pandemic by providing hot meals every Saturday to homeless and vulnerable people across Swansea.

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 a greater confidence in the goods they buy and services they use.

Access to Services

The disabled facilities at the Liberty Stadium are some of the most advanced in the UK. From the original planning through to the delivery, the home of Swansea City AFC has not failed in catering for all areas of disabilities ensuring equality and self-empowerment where possible.

The Liberty Stadium has a number of wheelchair spaces plus seats for assistants and operates a ticketing policy whereby a disabled spectator or supporter can bring an assistant (PA) free of charge. In addition to this, Swansea City also provides a variety of auxiliary services, such as audio described match commentary which is provided via the local hospital radio service, Radio City, and hearing loops within its ticket office. Further provisions are on-site disabled

parking bays for blue badge holders which are available on request, as well as a dedicated disabled supporter drop-off point outside the ticket office.

Additionally, wheelchair users, or those with restricted mobility, can make use of disabled lifts which are in each of the four stands within the concourse. Disabled toilets are also situated at convenient points within the stadium concourse and on the mezzanine of all stands. These are operated using Radar keys and are provided with alarms in case of emergency.

The Club is in regular consultation with its thriving Disabled Supporters Association regarding the Stadium facilities and services to ensure that the Liberty Stadium remains a welcoming and enjoyable environment.

Training

All employees are required to undertake the Club’s bespoke Equality, Diversity and Inclusion Training each year.

The Club also provides specific training to recruiting managers on: Best Practice Recruitment which includes unconscious bias and reasonable adjustments and Mental Health Awareness.

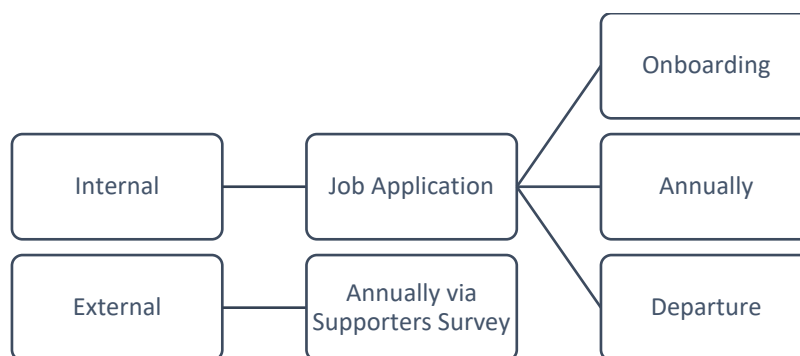
The Club requires all employees who work within the Safeguarding Team and Academy Department to complete mandatory Adverse Childhood Experience Training.

All Club employees are required to complete Safeguarding Training annually.

Monitoring Equality and Diversity

The Club actively participates in anonymous equality monitoring throughout all areas of the business.

The Club ensures that any personal information disclosed to the Club through the Equality Monitoring Audits which are regularly undertaken will be treated in such a way as to comply with the Club’s Data Protection Policies and Procedures (drafted in line with the Data Protection Act 2018 and General Data Protection Regulation).



Responsibility, Monitoring and Evaluation

The Board will be accountable for ensuring the implementation of this policy. Swansea City AFC employees recognise their individual responsibility for the day to day implementation of equality at the Club.

The Board itself will review the policy at intervals of no more than three years, (or when necessary due to changes in legislation) in line with the Club's policy review process.

The Board will appoint an Equality Champion to manage the day to day development and implementation of this policy.

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 player, fan, employee, board member, participant in outreach programmes and other people engaged with the Club's activities who violate this equality policy.

Complaint Monitoring

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, fan or any other person engaged with the Club's activities should, in the first instance, complain to that person. If this does not resolve the matter or the individual is not comfortable in doing so they should raise the matter following the process identified in Appendix 3.

The Club will investigate all formal complaints personally and appoint a person to do this. The investigation will be conducted impartially, confidentiality, 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 and it will be reported to the Swansea City AFC Board. If the investigation reveals unacceptable discriminatory behaviour the Club will follow the necessary procedures and may impose sanctions on that person or organisation 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 and, subject to the outcome, may consider taking action in relation to the matter concerned.

Policy Review

This Policy is reviewed on an annual basis by the Compliance Department. Any changes to this policy will be sent to the board for approval and then communicated via the HR Intranet and Club website.

Appendix

1. Legal Rights
2. Forms of Discrimination
3. Reporting Discrimination
4. Key Contacts

Appendix 1 – Legal Rights

Under the Equality Act 2010, in Great Britain it is potentially unlawful to discriminate in relation to age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation (Protected Characteristics).

This means that individuals will be protected if they have a characteristic, are assumed to have it, associate with someone who has it or are with someone who is assumed to have it.

Appendix 2 – Forms of Discrimination

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’ applies to ‘B’ an apparently neutral provision, criterion or practice that ‘A’ would apply equally to others, but which puts or would put those who share ‘B’s’ protected characteristic at a particular disadvantage.

Discrimination arising from disability

Discrimination arising from a disability occurs where ‘A’ treats ‘B’ unfavourably because of something arising in consequence of ‘B’s’ disability, and ‘A’ cannot show that the treatment is proportionate means of achieving a legitimate aim.

Harassment

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.

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

Supporters

Swansea City AFC Supporters can report discriminatory behaviour via the Club's complaint procedure. Further guidance on how to make a complaint can be found [here](#).

Club Employee / Job Applicants

Swansea City AFC has dedicated policies and procedures in place to deal with incidents of discrimination relating to a member of staff. If you are member of staff and have been directly or indirectly discriminated against, please refer to your Employee Handbook for the necessary reporting procedures.

Players

During a match – Players should immediately report any form of discrimination that takes place during a match to the Match Officials. The Player should also inform a Club Official of the incident after the game.

On Club business - Players should immediately report any form of discrimination to the First Team Manager if the incident takes place on Club business or at the training ground.

Alternatively, Players can report acts of discrimination directly to the FA using the below contact details;

footballforall@TheFA.com or info@kickitout.org