



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
June 2023	Nicola Butt	V1.4	Full Review
June 2022	Nicola Butt	V1.3	Full Review and Inclusion of Menopause guidance
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 SCAFC SCAFC Foundation Andy Coleman Gareth Davies Paul France	V1.4	June 2023
SCAFC SCAFC SCAFC Foundation Julian Winter Gareth Davies Helen Elton	V1.3	June 2022
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 Swansea.com Stadium at support@swanseacity.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 ensuring everyone who wishes to be involved within the Club in whichever capacity have 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 or abuse.

Our Goals

Equality, Inclusion and Diversity is a core focus for the Club and its wider strategy and one of its core goals is:

'To be an inclusive, family orientated and community club that develops and supports its people'.

The Club aims to achieve this goal by introducing engagement programmes which focus on Equality and Diversity, developing and encouraging a healthy workplace culture and working closely with the Swansea City AFC Foundation.

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

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 following groups:

- Club and Foundation Employees via the HR Intranet and Induction
- Match Day Workers via the Match Day Handbook
- Foundation 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 Swansea City AFC Foundation



The Foundation is passionately committed to promoting equality, diversity and inclusion within our organisation and in our local community.

We believe everyone should have an equal opportunity to fulfil their potential.

We recognise, respect and celebrate our differences and we are committed to creating an environment where everyone feels included, welcomed and valued.

We will ensure that everyone who takes part in Foundation activities and our staff and volunteers are listened to and their voice heard.

Supporting the most disadvantaged and working for equality and inclusion is at the heart of our mission and we are striving to create positive change across south west Wales.

We acknowledge that inequalities and discrimination exist and negatively impact many in our local community. We believe this to be unacceptable and will stand as allies with those who are oppressed.

We will actively promote the values of equality, diversity and inclusion in our employment and working practices, through the performance of our staff as role models and in the activities we run.

We are determined to eliminate discrimination on the basis of age, disability, sex, gender reassignment, marital or civil partnership status, pregnancy or maternity, race, religion or belief or sexual orientation.

We will not tolerate any form of discrimination and will act to address such behaviour with appropriate action whenever it occurs.

We commit to creating an environment where everyone's rights, dignity and individual worth is respected and they can enjoy their engagement with the Foundation without the threat of intimidation, victimisation, harassment, bullying or abuse.

This Statement of Commitment has the full backing of the Foundation Board of Trustees,

Foundation Senior Management Team and Swansea City AFC.

The Foundation commitment to EDI is expressed through a number of projects that seek to increase participation among underrepresented groups.

Training & Development

The Club believes that education and training is essential to ensuring all employees are kept up to date and have current knowledge of EDI matters.

As well as receiving specific Equality, Diversity and Inclusion training every three years, the club requires employees to complete a number of course modules, such as:

- Mental Health Awareness
- Menopause Awareness
- Safeguarding (including, Adverse Childhood Experiences for Academy roles)
- Autism Awareness
- Dementia Friends and Dementia Friend Champions

The Protected Characteristics

Age

The Club understands the positive impact a diverse age range of employees will have on its business and encourages contributions of 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 or mental health and long-standing or fluctuating health conditions. The Club encourages job applications from disabled people, is Dyslexia Friendly and 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.

Mental Health

The Club is an advocate for mental health awareness and ending the stigma associated with mental health issues.

The Club provides mental health support options to its employees, supporters, and those within the local community.

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 Flexible Working Policies

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.

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.

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.

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

Whilst homelessness and poverty are not recognised protected characteristics, the club supports those who face financial disadvantage and will continue to work with charities and projects to support those within the community.

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 Swansea.com 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 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 Stadium remains a welcoming and enjoyable environment.

Reasonable Adjustments

The Club recognises that it has a duty to make reasonable adjustments for disabled persons. The duty to make reasonable adjustments may include the removal, adaption or alteration of physical features, if these make it impossible or unreasonably difficult for disabled people to carry out their role. It may also include making changes to working arrangements.

Monitoring Equality and Diversity

The Club actively participates in anonymous equality monitoring throughout all areas of the business. This includes, job application, annually and when leaving. The club also conducts an equality monitoring survey for season ticket holders.

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 HR 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