

Ratified Date: February 2023

Compiled by: LS

**Title: Equality, Diversity and
Inclusion Policy**

Review: 3 years from date

Authorised by: Programmes
Committee

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1. Policy Statement

The Foundation of Light (FOL) promotes Equality, Diversity and Inclusion and challenges all forms of discrimination through its internal operations and in the delivery of its services in accordance with and commitment to the 2010 Equality Act. The FOL protects the rights of individuals and advances equality of opportunity for all. It demonstrates the FOL's commitment to continuous improvement in EDI to create meaningful and sustainable change.

2. Policy Aim

The importance of EDI is becoming ever more appreciated both within the charity and sports sectors and across society as a whole. The latest iteration of the *Charity Governance Code* included significant developments in this area. The *Code* emphasises the importance of effective EDI practices in enabling a charity to fulfil its potential: "Addressing equality, diversity and inclusion helps a board to make better decisions. This requires commitment, but it means that a charity is more likely to stay relevant to those it serves and to deliver its public benefit. Recognising and countering any imbalances in power, perspectives and opportunities in the charity, and in the attitudes and behaviour of trustees, staff and volunteers, helps to make sure that a charity achieves its aims".

Promoting EDI and challenging and preventing discrimination has a significant, positive impact on how people feel and think about the FOL – and ultimately on their wellbeing – whether they are part of the FOL, a participant or another stakeholder. Everyone associated with the FOL is fully aware of the FOL's robust stance against any form of discrimination, harassment and abuse, creating confidence that FOL will act when these expectations are not met. The policy aims to eliminate unfair treatment.

3. Definition of Terms

We are unreservedly opposed to any form of discrimination being applied against staff members of the Foundation, or anyone who uses our services on the grounds of the nine protected characteristics as defined in the Equality Act 2010.

There is a greater emphasis on mental health and wellbeing (MH&W). Mental health is included in the definition of the protected characteristic of disability; however, many people with mental health concerns might not identify this way.

The policy is with reference to the *Equality, Diversity & Inclusion Standard* and the *Equality Code of Practice*. The *Football Leadership Diversity Code* asks clubs and their charities to commit to its principles and pledges.

Equality and diversity is about creating environments which encourage individuals to achieve their full potential and about challenging myths and stereotypes. It is not about treating everyone the same. It is about treating everyone according to their own individual needs and is essential to good working practice.

Discrimination by or against an employee is generally prohibited unless there is a specific legal exemption. Discrimination may be direct or indirect and it may occur intentionally or unintentionally.

Direct discrimination occurs where someone is treated less favourably because of one or more of the protected characteristics set out above. For example, rejecting an applicant on the grounds of their race because they would not "fit in" would be direct discrimination.

Indirect discrimination occurs where someone is disadvantaged by an unjustified provision, criterion or practice that also puts other people with the same protected characteristic at a particular disadvantage. For example, a requirement to work full time puts women at a particular disadvantage because they generally have greater childcare commitments than men. Such a requirement will need to be objectively justified.

Victimisation is also prohibited. This is less favourable treatment of someone who has complained or given information about discrimination or harassment or supported someone else's complaint.

Harassment and bullying that relates to any of the protected characteristics is prohibited. Harassment is unwanted conduct that has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.

Protected Characteristics

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

4. Scope

The policy (and accompanying manual) applies to all employees, Board Members, partners, and volunteers of the Foundation. It also applies to contractors and visitors, not employed by the Foundation but engaged to work with or who have access to Foundation information, for example, computer maintenance contractors, Foundation partners, and consultants working on behalf of the Foundation.

The principles of non-discrimination and equality of opportunity also apply to the way in which staff treat visitors, clients, customers, suppliers and former staff members.

5. Policy Principles

Leadership and Commitment

The Board and the Executive Team actively promote and demonstrate accountability for and commitment to EDI, including MH&W and eliminating unfair and unlawful treatment. This includes internal and external communications and an annual achievements report showcasing the FOL's EDI work. The designated Trustee for EDI is The Baroness Grey-Thompson DBE DL, who also sits on the Programmes Board.

All staff and volunteers contribute to the FOL's EDI outcomes and EDI is embedded in the FOL's policies and procedures which are reviewed and approved by the Board. EDI is embedded in all the FOL's processes and operations and EDI reviews inform the FOL's decision-making and risk management. It includes bullying, harassment and victimisation, fair pay, promotion, and other people policies.

The FOL has an EDI Action Plan covering all areas of the FOL's activities and operations. The FOL monitors and assesses progress towards the EDI targets set out in the plan that includes under-representation from EDI priority groups and actions on MH&W. The Plan is reviewed and approved by the Board every three years via the Programmes Committee in the context of developing the Strategic Plan and the FOL has an EDI Working Group which supports the development and implementation of the Plan. The Working Group includes the designated Trustee and one member of the Executive Team.

Promoting EDI and Challenging and Preventing Discrimination

The FOL's EDI Action Plan includes measures to increase awareness of the FOL's work to promote EDI and to challenge and prevent discrimination, harassment, and abuse. In particular, the FOL's EDI statement of commitment and its robust stance against any form of discrimination, harassment, and abuse, are promoted internally and externally to cover all areas of the FOL's activities and operation.

The FOL evaluates its incident management systems every three years, to ensure, and increase confidence in, the effectiveness of those systems. They include incident management procedures for the FOL's activities which reports, records, deals with and analyses incidents of discrimination, harassment and abuse which is reviewed annually to help inform the FOL's EDI Action Plan; and training for all staff and volunteers on all forms of discrimination, harassment, and abuse so that they are confident to manage EDI incidents.

The FOL's EDI Action Plan and its Strategic and Operational Plans are informed by data and insight on EDI. This includes data segmentation within the groups being assessed; an annual audit of all people within the FOL, against all relevant protected characteristics; an EDI monitoring report produced each year from the EDI audit and a review of the accessibility and inclusivity of the FOL's activities and communications every three years.

FOL is dedicated to fostering a workplace where all individuals are treated with dignity, respect, and are free from sexual harassment. We uphold a zero-tolerance stance on sexual harassment, applicable to all staff members, including employees, contractors, and any other individuals associated with our organisation. Recognising that harassment may occur both within and outside formal work settings, such as during social events, business trips, or online interactions, we emphasise that any form of harassment or victimisation will lead to corrective measures up to and including dismissal. Our commitment is to prevent and address incidents of sexual harassment by establishing a clear framework for reporting, investigating, and managing such complaints. This commitment applies to all individuals within the organisation, as well as interactions with third parties, such as clients, vendors, and visitors. We promote a culture where all employees are encouraged to report any harassment they experience or witness.

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Breach of this policy could lead to disciplinary procedures as detailed in the People Manual.

6. Ratification and Review

The Policy will be reviewed every three years.