



# Equality, Diversity & Inclusion Policy Handbook

## Equality, Diversity & Inclusion Policies and Procedures Handbook

The **Policies & Procedures** contained within this **Equality, Diversity & Inclusion Handbook** are intended to demonstrate Northampton Town Football Club Community Trust's (NFCT CT) commitment to equality, diversity, inclusion and anti-discrimination in all areas of our work. This Handbook also provides clarity on how we will deliver our operations, activities and services to ensure that that no one is excluded.

Furthermore, these policies & procedures detail your own responsibilities and duties - as well as the standards expected from you - in relation to equality, diversity & inclusion.

Please ensure that you carefully read all that follows - and retain the complete **Equality, Diversity & Inclusion Policies and Procedures Handbook** in a safe place for future reference.

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An up to date version of this **Equality, Diversity & Inclusion Policies and Procedures Handbook** is available from the NFCT CT person responsible for HR.

## 1. Commitment to Achieving Equality

**The Board of NFCT CT firmly believes that Equality can only be achieved by working in partnership across all elements of the community we serve. Furthermore, the goals of Equality, Diversity, Inclusion and Anti-Discrimination will only be truly progressed if everyone that represents NFCT CT (our Trustees, our Staff and our Volunteers) believe in - and are committed to - the same goals.**

### Step 1

The first steps in the journey of achieving Equality, Diversity, Inclusion and Anti-Discrimination was to establish our stance on what we understand by the term Equality. **For NFCT CT this is articulated as follows:**

**Equality is not about treating everyone the same; it's about ensuring that everyone has Equal Access to Opportunities - through taking into account the Differing Needs and Capabilities of People.**

### Step 2

Next, it was a case of appreciating and valuing diversity - which was achieved by NFCT CT reflecting upon how legislation seeks to protect the differences that people exhibit. **From here we were able to include reference to protected characteristics which helped create the following:**

**Diversity is about recognising and valuing differences through the inclusion of as many people as possible, regardless of whether those differences relate to protected characteristics such as age, disability, gender reassignment, marriage & civil partnership, pregnancy & maternity, race (which includes colour, nationality, citizenship and ethnic or national origin), sex (or gender identity) and/or sexual orientation.**

### Step 3

For NFCT CT, step 3 was about building in the acknowledgement (and the valuing) of other differences that were not afforded the protection of legislation. **This allowed the following element of our Equality Statement to be developed:**

**Diversity and inclusion also includes valuing other differences linked to such things as homelessness, income levels, having previous criminal convictions, commitments outside of work, working part-time or shift work, language, union activity, health status, perspectives, opinions and/or an individual's personal values etc.**

### Step 4

From here we began thinking about how NFCT CT could be seen to be practicing equality. **This was achieved by developing the following statement about Equal Opportunity:**

**For NFCT CT, practicing equality is about ensuring that every individual has an equal opportunity to make the most of their lives and their talent; and a belief that no one should have a poorer life chance because of such things as the way they were born, where they come from, what they believe - or whether they have a disability etc. And equality is also about recognising that certain groups of people have historically experienced discrimination.**

### Step 5

The next step was to develop NFCT CT's commitment statement to be able to publicly communicate the organisations commitment to Equality, Diversity, Inclusion and Anti-Discrimination. **This focus allowed NFCT CT to produce the following:**

## Commitment to Achieving Equality continued...

**NFCT CT are fully committed to equality, diversity, inclusion and anti-discrimination. We will work to address areas of under-representation and disadvantage in all aspects of our operations, activities and services. In practice, this means that we will respect the needs of each and every individual regardless of their differences; and to this end we will deliver our operations, activities and services in such a way so as to ensure that that no one is excluded.**

### Step 6

Having gotten this far, NFCT CT appreciated the need to have key people with responsibility for promoting and implementing NFCT CT's commitment to Equality, Diversity, Inclusion and Anti-Discrimination. Without this focus and accountability there would be no leadership to turn NFCT CT's **Equality Statement** into reality.

NFCT CT identified a Board Lead and a Staff Lead for Equality Diversity and Inclusion and we call these people our Equality Champions.

**NFCT CT's Equality Statement is detailed in Section 2 of this Equality, Diversity & Inclusion Policies and Procedures Handbook - which is Part 1 of our EDI Toolkit.**

### Step 7

NFCT CT understood the importance of creating a suite of Equality, Diversity and Inclusion Policies & Procedures that would simply articulate where we stood on various matters related to Equality.

This became Part 1 of our Toolkit - and which we firmly believe will support our journey to achieving better Equality, Diversity, Inclusion and Anti-Discrimination across all areas of our operations, activities and services.

### Step 8

As stated in the introduction to this Commitment to Achieving Equality section, progress can only be made when all of NFCT CT's Trustees, Staff and Volunteers believe in and are committed to our goals. The way that NFCT CT believes this can best be achieved is by supporting Trustees, Staff and Volunteers to develop their knowledge and awareness of diversity and what equality means.

NFCT CT aims to do this by providing the appropriate guidance, induction and refresher training so they can be the best examples of what it means to practice equality and be truly inclusive towards diversity in all its guises.

**NFCT CT has developed an Equality, Diversity & Inclusion Staff Guidance Handbook to deliver on this element of our commitment - and this resource makes up Part 2 of our EDI Toolkit.**

### Step 9

Notwithstanding all of the above, NFCT CT will still not deliver on its commitment to Equality, Diversity and Inclusion unless we ensure that our Trustees, Staff, Volunteers and Participants reflect the diversity of the community that we serve.

The only way that we can know for sure what further work is required in this area (and know where to focus our attention more accurately) is by conducting diversity audits - and which are then repeated at regular intervals to measure progress and monitor any changes that have occurred in our local community.


**NFCT CT has developed an Equality, Diversity & Inclusion - Action Plan: From Policy to Practice Handbook to outline and support the practical steps that will be taken to conduct Equality Audits and develop NFCT CT's SMART Equality Action Plan. This guidance (as well as all of the associated resources) are Parts 3, 4 & 5 of our EDI Toolkit.**

## **Commitment to Achieving Equality continued...**

### **Step 10**

Finally, NFCT CT appreciates the importance of ensuring that everything around the periphery of this very specific focus and commitment to Equality, Diversity, Inclusion and Anti-Discrimination holistically underpins our Equality Statement. To this end, NFCT CT has made a commitment to undertake regular reviews of all of its existing Policies and Procedures (including when developing new Policies and Procedures) to ensure that Equality, Diversity, Inclusion and Anti-Discrimination are always adequately addressed and imbedded throughout every area of our work.

**As the Chair of Trustees, I confirm that NFCT CT's approach to Equality, Diversity, Inclusion and Anti-Discrimination, as well as its Equality Statement have been Reviewed, Approved and Adopted by NFCT CT's Trustees and NFCT CT's Management Team.**



**Scott Desborough | Chair of Trustees**  
**16<sup>th</sup> July 2021**

**Reviewed & Updated: June 2021**

NFCT CT will review this **Commitment to Achieving Equality** at least annually. In addition, more frequent reviews will be undertaken following any relevant change in legislation; as part of a process following the outcomes of our equality audits; following implementation of a new activity or service; and/or following any major equality, diversity, inclusion and/or discrimination incidents within NFCT CT or the affiliated Club.

## 2. NFCT CT's Equality Statement

### Equality Statement

For Northampton Town Football Club Community Trust (NFCT CT), **equality** is not about treating everyone the same; it's about ensuring that everyone has **equal access to opportunities** - through taking into account the **differing needs and capabilities of people**.

### Protected Characteristics

**Diversity** is about recognising and valuing differences through the **inclusion** of as many people as possible, regardless of whether those differences relate to **protected characteristics** such as **age, disability, gender reassignment, marriage & civil partnership, pregnancy & maternity, race** (which includes **colour, nationality, citizenship** and **ethnic or national origin**), **sex** (or **gender identity**) and/or **sexual orientation**.

### Valuing All Differences

However, **diversity** and **inclusion** also includes **valuing other differences** linked to such things as **homelessness, income levels**, having previous **criminal convictions, commitments outside of work, working part-time or shift work, language, union activity, health status, perspectives, opinions** and/or an individual's **personal values** etc.

### Equal Opportunity

Therefore, for NFCT CT, **practicing equality** is about ensuring that every individual has an **equal opportunity** to make the most of their lives and their talent; and a belief that no one should have a poorer life chance because of such things as **the way they were born, where they come from, what they believe** - or whether they have a **disability** etc. And equality is also about recognising that certain groups of people have historically experienced discrimination. **It is because of this belief and understanding that NFCT CT is committed to the following:**

**"NFCT CT are fully committed to equality, diversity, inclusion and anti-discrimination. We will work to address areas of under-representation and disadvantage in all aspects of our operations, activities and services. In practice, this means that we will respect the needs of each and every individual regardless of their differences; and to this end we will deliver our operations, activities and services in such a way so as to ensure that that no one is excluded."**

### Equality Champions

NFCT CT have appointed an **Equality, Diversity & Inclusion Lead** at **Board level** who has responsibility for **promoting** equality, diversity and inclusion within NFCT CT and in the delivery of our services. NFCT CT has also appointed an **Equality, Diversity & Inclusion Lead** at **Staff level** who has responsibility for **implementing** and **monitoring** equality, diversity and inclusion within NFCT CT and in the delivery of its services.

	EDI Board Lead	EDI Staff Lead
Name	Scott Desborough	Anna Letts
Email	<a href="mailto:scott.desborough@gmail.com">scott.desborough@gmail.com</a>	<a href="mailto:anna.letts@ntfc.co.uk">anna.letts@ntfc.co.uk</a>
Telephone	07966 284852	07896 299377

**Reviewed & Updated: June 2021**

NFCT CT will review this **Equality Statement** at least annually. In addition, more frequent reviews will be undertaken following any relevant change in legislation; as part of a process following the outcomes of our equality audits; following implementation of a new activity or service; and/or following any major equality, diversity, inclusion and/or discrimination incidents within NFCT CT or the affiliated Club.



### 3. Equality, Diversity & Inclusion Charter

#### Equality, Diversity & Inclusion Charter

- NFCT CT have appointed a named lead at Board level who is responsible for promoting equality, diversity and inclusion within our organisation and in the delivery of our services.
- NFCT CT have appointed a named lead within our Staff team who is responsible for implementing equality, diversity and inclusion within our organisation and in the delivery of our services.
- NFCT CT has produced a written Policy (called our Equality Statement) that articulates our commitment to promoting equality and inclusion and addressing areas of under-representation and disadvantage in all aspects of our operations, activities and services.
- NFCT CT's Equality Statement - as well as all Policies & Procedures in this Equality, Diversity & Inclusion Handbook - will be Reviewed, Approved & Adopted by our Board no less than once every three years.
- NFCT CT has developed a Complaints Procedure for reporting and managing incidents and allegations of discriminatory actions or behaviour, as well as incidents and allegations of harassment, bullying and/or victimisation.
- NFCT CT will provide induction training on equality, diversity and inclusion to all Trustees, Staff and Volunteers within one month of them joining our team.
- NFCT CT will provide refresher training on equality, diversity and inclusion to all Trustees, Staff and Volunteers at least once every two years following their induction training.
- NFCT CT will maintain written records of all induction and refresher equality, diversity and inclusion training that it undertakes and this will include details of the date of the training and who attended (with their signatures), as well as a summary of what was covered during each induction or refresher training.
- NFCT CT has considered and addressed equality, diversity and inclusion in all areas of our policies and procedures - which includes the policies and procedures for Trustees, Staff, Volunteers and Participants - as well as for Contractors and Suppliers (and this incorporates such areas as Safeguarding, Health & Safety and Data Protection etc.).
- NFCT CT will ensure that when any new policies and procedures are developed - as well as when existing policies and procedures are reviewed - due consideration will be given to ensuring equality, diversity and inclusion is covered adequately and addressed unequivocally, where this is appropriate to the policy or procedure.
- NFCT CT will conduct regular Equality Audits of our Board, Staff, Volunteers and Participants.
- NFCT CT will work with Northampton Town Football Club to produce our Equality Action Plan and which will include SMART Diversity Targets.
- NFCT CT's Equality Action Plan will be Reviewed, Approved & Adopted by our Board no less than once every 12 months.
- NFCT CT has Codes of Conduct for its Board, Staff, Volunteers and Participants which include equality, diversity and inclusion.
- NFCT CT's Strategy Document has focused equality, diversity and inclusion objectives within it.
- NFCT CT's budget and business plan will specifically allocate the required resources to support the implementation of our equality, diversity and inclusion objectives.

## Equality, Diversity & Inclusion Charter continued...

### Equality, Diversity & Inclusion Charter

- **NFCT CT will seek to collect anonymised information about our Participants, their needs and their demographic profile. The purpose of doing this includes:**
  - By benchmarking the diversity of the Participants who access our services we can then compare this to the demographics of our local community we serve.
  - To identify the suitability and effectiveness of our services.
  - To compare our performance against the equality, diversity and inclusion objectives that we set ourselves.
  - To understand where our services should be open to all and where they should be better targeted.
  - To enable us to develop more specific programmes to increase engagement among under-represented and/or specific groups within the community we serve.
- **NFCT CT will ensure that whenever an internal committee, panel or other working group is established we will record the steps that were taken to address the diversity of its membership.**
- **NFCT CT will ensure that whenever a new project or service is being considered (as well as when planning its implementation) we will ensure that that equality, diversity and inclusion issues are addressed. Such areas of consideration and planning will include:**
  - Identifying any barriers to participation for different groups of Participants and how any identified barriers should be addressed.
  - Identifying and proactively seeking to engage hard to reach or socially excluded groups within our community.
  - Considering the accessibility of our services in terms of time, duration, cost and location.
  - The use of inclusive and accessible promotional and marketing materials that have been designed specifically for under-represented groups.

**Reviewed & Updated: June 2021**

NFCT CT will review this **Equality, Diversity & Inclusion Charter** at least annually. In addition, more frequent reviews will be undertaken following any relevant change in legislation; as part of a process following the outcomes of our equality audits; following implementation of a new activity or service; and/or following any major equality, diversity, inclusion and/or discrimination incidents within NFCT CT or the affiliated Club.



## 4. Equal Opportunities Policy

**NFCT CT are fully committed to Equality, Diversity, Inclusion and Anti-Discrimination in every area of our operations, activities and services. In practice, this means that we will respect the needs of each and every individual regardless of their differences; and to this end we will deliver our operations, activities and services in such a way so as to ensure that that no one is excluded. NFCT CT has a Zero Tolerance Policy to breaches of this Equal Opportunities Policy.**

### Who does this Policy apply to?

This **Equal Opportunities Policy** applies equally to our Trustees, our Staff, our Volunteers and our Participants - as well as equally to all NFCT CT stakeholders and everyone else that interacts with NFCT CT in any capacity - such as parents, families, carers, advocates, agency workers, contractors, suppliers and visitors **etc.**

### Where and when does this Policy apply?

NFCT CT will avoid unlawful discrimination in all aspects of its operations, activities and services including - but not limited to - all aspects of employment (recruitment, selection, promotion, transfer, opportunities for training, pay and benefits, other terms of employment, discipline, selection for redundancy and dismissal); and all aspects of delivering NFCT CT activities and services.

**Please refer to NFCT CT's Trustees Good Governance Handbook, Employee Handbook, Casual Staff Handbook & NFCT CT's Safeguarding Handbook - which all have specific Equal Opportunities Policies relating to each specific group.**

### What is Discrimination?

Discrimination means treating a person (or group of people) differently from others because of who they are, or because they possess a certain feature or quality - known as a characteristic. Treating any person or group unfairly because of who they are, or because they possess a certain characteristic, is unlawful under the **Equality Act 2010**.

### What are the Protected Characteristics?

This **Equality Act 2010** identifies the following nine characteristics that are protected from discrimination:

Age	Disability	Gender Reassignment
Marriage & Civil Partnership	Pregnancy & Maternity	Race
Religion or Belief	Sex	Sexual Orientation

Therefore, discrimination that occurs as a consequence of one or more of the above nine protected characteristic is unlawful under the Equality Act. NFCT CT takes a Zero Tolerance approach.

### What is meant by Zero Tolerance?

Quite simply this means that NFCT CT do not allow any violations of its **Equality, Diversity, Inclusion** and/or **Anti-Discrimination Policies and Procedures** and will take action even if it is a first time breach.

This applies to both Direct & Indirect Discrimination, to Discrimination by Association and Discrimination by Perception, as well as to any acts of Harassment, Bullying and/or Victimisation.

## **Equal Opportunities Policy continued...**

### **What is Direct Discrimination?**

If a person with one or more of the protected characteristics outlined above is treated less favourably than someone else in similar circumstances, then this would be called Direct Discrimination **e.g.** you have the required experience and qualifications for the job, but your application is rejected because you are considered either too young or too old.

### **What is Indirect Discrimination?**

If an employer establishes a rule or policy at work that puts a person at a disadvantage compared to their other colleagues this could be considered to be Indirect Discrimination **e.g.** if your employer requires all employees to work on Sundays, then as a Christian this would prevent you from attending church which is a day of worship for Christians.

### **What is Discrimination by Association?**

If a person is treated unfairly because of someone that they know, or are associated with, has one of the protected characteristic, then this could be considered to be Discrimination by Association **e.g.** you are refused service in a restaurant because you are with someone who belongs to a particular race.

### **What is Discrimination by Perception?**

If a person receives unfair treatment because someone thinks that they belong to a group with protected characteristics, then this could be considered to be Discrimination by Perception **e.g.** even though you are heterosexual a letting agent refuses to allow you to rent a property because they make an assumption that you are gay as a consequence of their misconceptions about how gay people look, dress or behave.

### **What is Harassment?**

Harassment is any unwanted behaviour or conduct related to a protected characteristic - and the conduct or behaviour has the purpose (or effect) of violating the other persons dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for that other person. Unlawful harassment also occurs where a person engages in unwanted behaviour or conduct of a sexual nature, and the conduct has the purpose (or effect) of violating the other persons dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for that other person.

### **What is Bullying?**

Bullying is any repetitive behaviour that is intended to hurt or intimidate another person and where the relationship involves an imbalance of power (or even a perception of an imbalance of power). Bullying can occur face to face, by letter and email, as well as online via social media (which is known as cyber-bullying).

### **What is Victimisation?**

Victimisation occurs if a person is subjected to a detriment because they have raised (or supported another person with) a grievance or complaint of unlawful discrimination. It also occurs if a person issues employment tribunal proceedings for unlawful discrimination, or they have given evidence in connection with unlawful discrimination proceedings brought by another person.

### **What is a Detriment?**

A detriment quite simply means that a person has suffered a disadvantage of some sort, or has been put in a worse off position than they were before **e.g.** you have made a complaint of sex discrimination against your employer, who as a result denies you an opportunity of promotion. You have therefore suffered a detriment by virtue of not getting promoted.

**NFCT CT has a separate Dignity at Work Policy (detailed in this Handbook) which deals with Harassment, Bullying and Intimidation in further detail.**

## **Equal Opportunities Policy continued...**

### **What are your responsibilities for Equal Opportunities?**

Every single person that engages with NFCT CT's operations, activities and or services - in any way and in any capacity - has a duty to cooperate with NFCT CT to ensure that every element of the organisations commitment to equality, diversity, inclusion and anti-discrimination is effective.

**Appropriate action will be taken against any person who is found to have breached any of NFCT CT's Equality, Diversity, Inclusion and/or Anti-Discrimination Policies and Procedures, or who has been found to have committed any act of improper or unlawful discrimination. Everyone should bear in mind that they can be held personally liable for any act of unlawful discrimination that they commit.**

### **What should I do if I suspect Discriminatory Acts or Practices?**

Every single person that engages with NFCT CT's operations, activities and or services - in any way and in any capacity - has a duty to report any suspected discriminatory acts or practices to NFCT CT. Reports can be made to NFCT CT's Equality Diversity & Diversity Board or Staff Leads - whose contact details can be found on Page 4 of this Handbook.

**The full Reporting Complaints Policy can also be found at the end of this Equality, Diversity & Inclusion Policies and Procedures Handbook.**

### **What should I do if I experience Discrimination?**

NFCT CT is fully committed to deal with all complaints and allegations of discrimination seriously, confidentially and speedily. NFCT CT will never ignore or treat lightly any complaints of unlawful discrimination from any person.

**The full Reporting Complaints Policy can also be found at the end of this Equality, Diversity & Inclusion Policies and Procedures Handbook.**

### **How can I support someone who makes a Complaint?**

It is illegal for any person to victimise or retaliate against another person who has made allegations or complaints of discrimination, or who has provided information about such discrimination. NFCT CT will not tolerate any such behaviour and will take the appropriate action against any individual or group who behaves in such a way.

**NFCT CT expects everyone to support anyone who has made a complaint.**

**Reviewed & Updated: June 2021**

NFCT CT will review this **Equal Opportunities Policy** at least annually. In addition, more frequent reviews will be undertaken following any relevant change in legislation; as part of a process following the outcomes of our equality audits; following implementation of a new activity or service; and/or following any major equality, diversity, inclusion and/or discrimination incidents within NFCT CT or the affiliated Club.

## 5. Dignity at Work Policy

**NFCT CT seeks to provide a work environment in which all Trustees, Staff & Volunteers are treated with Respect and Dignity - and one that is free from any form of Harassment, Bullying and/or Intimidation based upon any of the Protected Characteristics, or upon any other grounds.**

### Zero Tolerance

NFCT CT will not condone or tolerate any form of Harassment, Bullying or Intimidation, whether engaged in by Trustees, Staff & Volunteers, or by outside third parties such as Participants, Stakeholders, Contractors & Suppliers.

### A Duty to Co-operate

Trustees, Staff & Volunteers have a duty to co-operate with NFCT CT to make sure that this **Dignity at Work Policy** is effective in preventing Harassment, Bullying or Intimidation.

### Responsibilities of all Trustees, Staff & Volunteers

NFCT CT will bring this Policy to the attention of all Trustees, Staff & Volunteers during induction. Consequently, all Trustees, Staff & Volunteers will be responsible for conducting themselves in accordance with this **Dignity at Work Policy** at all times.

### Responsibilities of all Participants, Stakeholders, Contractors & Suppliers

NFCT CT will ensure that this **Dignity at Work Policy** is brought to the attention of Participants, Stakeholders, Contractors & Suppliers at the commencement of the relationship. Consequently, all Participants, Stakeholders, Contractors & Suppliers will be responsible for conducting themselves in accordance with this **Dignity at Work Policy** at all times, in all of their dealings with NFCT CT across its operations, activities and services.

### Consequences of Breaches

Action will be taken under the appropriate procedure against any person who is found to have committed any act of improper or unlawful Harassment, Bullying or Intimidation. Serious breaches of this **Dignity at Work Policy** could render NFCT CT Trustees, Staff and Volunteers liable to dismissal, or third parties to having their relationship with NFCT CT terminated.

**Appropriate action will be taken against any third party who is found to have committed any act of improper or unlawful harassment, bullying or intimidation against NFCT CT Trustees, Staff and/or Volunteers. Everyone should bear in mind that they can be held personally liable for any act of unlawful harassment and may also be guilty of a criminal offence.**

### What should I do if I suspect Harassment, Bullying or Intimidation?

Every single person that engages with NFCT CT's operations, activities and or services - in any way and in any capacity - has a duty to report any suspected harassment, bullying or intimidation to NFCT CT. Reports can be made to NFCT CT's Equality Diversity & Diversity Board or Staff Leads - whose contact details can be found on Page 4 of this Handbook.

**The full Reporting Complaints Policy can also be found at the end of this Equality, Diversity & Inclusion Policies and Procedures Handbook.**

### What should I do if I experience Harassment, Bullying or Intimidation?

NFCT CT is fully committed to deal with all complaints and allegations of harassment, bullying or intimidation seriously, confidentially and speedily. NFCT CT will never ignore or treat lightly any complaints of improper or unlawful harassment, bullying or intimidation from any person.

## **Dignity at Work Policy** continued...

**The full Reporting Complaints Policy can also be found at the end of this Equality, Diversity & Inclusion Policies and Procedures Handbook.**

### **How can I support someone who makes a Complaint?**

It is illegal for any person to victimise or retaliate against another person who has made allegations or complaints of harassment, bullying or intimidation, or who has provided information about such harassment, bullying or intimidation. NFCT CT will not tolerate any such behaviour and will take the appropriate action against any individual or group who behaves in such a way.

**NFCT CT expects everyone to support anyone who has made a complaint.**

**NFCT CT's Dignity at Work Policy covers harassment, bullying and intimidation both within NFCT CT's workplace, as well as within any other work-related setting outside the direct workplace e.g. during business trips, at external training events, or at work-related social events etc.**

**Reviewed & Updated: June 2021**

**NFCT CT will review this Dignity at Work Policy at least annually. In addition, more frequent reviews will be undertaken following any relevant change in legislation; as part of a process following the outcomes of our equality audits; following implementation of a new activity or service; and/or following any major equality, diversity, inclusion and/or discrimination incidents within NFCT CT or the affiliated Club.**

## 6. Anti-Bullying Policy

**NFCT CT will not tolerate any form of Bullying of any person across any of its operations, activities & services. The purpose of NFCT CT's this Policy is to prevent bullying from happening within the organisation, as much as possible. If bullying does occur, NFCT CT will take all steps necessary to stop it as quickly as possible - and will always take the appropriate action against any person that is responsible for it.**

### What is Bullying?

Bullying is any repetitive behaviour that is intended to hurt (both emotionally as well as physically), intimidate or humiliate another person and where the relationship involves an imbalance of power (or even a perception of an imbalance of power). Bullying can occur face to face, by letter and email, via mobile phones, as well as online (and known as cyberbullying) via social media and games. Cyberbullying is particularly concerning because it can happen wherever the person might be both day and night.

### What counts as Bullying?

- **Verbal Abuse:** This can include name calling and gossiping.
- **Non-Verbal Abuse:** Such as negative facial or physical gestures, mimicking unkindly or text messages.
- **Emotional Abuse:** This includes threatening, intimidating or humiliating someone.
- **Exclusion:** This happens when a person is being ignored or isolated by someone else.
- **Undermining:** Examples includes lying, constantly criticising or spreading rumours about a person.
- **Physical Assaults:** This includes hitting and pushing.
- **Making silent, hoax or abusive calls.**
- **Controlling or Manipulating** someone.
- **Abuse or Misuse of Power.**
- **Online or Cyberbullying:** Further details about this particular type of bullying is provided below...

### What is Cyberbullying?

Cyberbullying is a form of bullying behaviour that happens on social networks, online games and mobile phones - and includes such actions as spreading rumours about someone, posting nasty or embarrassing messages, images or videos, which are often seen by other people. Sometimes it can be carried out by a person (or persons) unknown to the person being bullied because it's much easier to be anonymous online.

### What counts as Cyberbullying?

- **Threatening:** By sending threatening or abusive text messages.
- **Embarrassing:** By creating and sharing embarrassing images or videos.
- **Trolling:** Which is the sending of menacing or upsetting messages on social networks, chat rooms or online games.
- **Exclusion:** By excluding others from online games, activities or friendship groups.
- **Hate:** By setting up hate sites or groups about a particular person.
- **Self Harm:** By encouraging another person to harm themselves.
- **Abuse:** By voting for or against someone in an abusive poll.



## Anti-Bullying Policy continued...

- **Sexting:** By sending explicit messages.
- **Faking, Hijacking & Stealing:** By creating a fake account, hijacking or stealing another person's online identity with the aim to embarrass that person or cause trouble using their name.
- **Sexual:** By pressuring a person into sending sexual images of themselves or engaging them in sexual conversations.

### What is the motivation for Bullying?

- **Racial** or **Religious:** This is identified by the motivation of the bully, the language used, and/or by the fact that victims are singled out because of the colour of their skin, the way they talk, their ethnic grouping or by their religious or cultural practices.
- **Disability:** This is where a person is singled out because of a disability.
- **Age:** This is when the age of a person (whether they be young or old) is used hurtfully against them.
- **Sexual:** This is behaviour - whether physical or non-physical - which is motivated by a person's sexuality or gender.
- **Homophobic/Bi-Phobic/Transphobic:** This is an irrational dislike, hatred or fear of individuals that are (or are perceived to be) lesbian, gay, bisexual or transgender.

### What do NFCT CT do to prevent Bullying?

**NFCT CT's primary objective is to prevent bullying from occurring in the first place, which it approaches in by doing the following:**

- Developing **Codes of Conduct** for Trustees, Staff, Volunteers, Participants and Families which address the prevention of bullying.
- **Inducting** (and **refresher training**) all Trustees, Staff and Volunteers on NFCT CT's stance of anti-bullying.
- **Increasing** everyone's awareness of equality, diversity and inclusion.
- **Reinforcing** to all Trustees, Staff and Volunteers what they can do personally to prevent bullying.
- **Drafting** appropriate Policies and Procedures aimed at communicating NFCT CT's zero tolerance policy on anti-discrimination, anti-harassment, anti-bullying and anti-victimisation.
- **Producing** an **E-Safety Policy** and **E-Safety Agreement** to help prevent online and cyberbullying.

### What does NFCT CT do to respond to Bullying?

**If bullying does occur NFCT CT deals with it promptly in the following ways:**

- By reference and adherence to NFCT CT's **Codes of Conduct, Anti-Bullying Policy & Anti-Bully Procedures**, as well as supporting anyone who has been bullied to make full use of NFCT CT's **Reporting Complaints Policy**.
- By taking the appropriate action against any person that has been found to have bullied another person.

**NFCT CT is fully committed to deal with all complaints and allegations of bullying seriously, confidentially and speedily. NFCT CT will never ignore or treat lightly any complaints of bullying from any person.**

**Reviewed & Updated: June 2021**

NFCT CT will review this **Anti-Bullying Policy** at least annually. In addition, more frequent reviews will be undertaken following any relevant change in legislation; as part of a process following the implementation of a new activity or service; and/or following any major equality, diversity and/or inclusion incidents within the CCO or Club.

## 7. Ethical Working Policy

**NFCT CT is committed to ethical and safe working practices in order to help protect all participants who engage with the organisation. To this end, NFCT CT will ensure that every person who engages with the organisation will be treated fairly and impartially.**

### What is meant by Ethical Working?

NFCT CT believes that working ethically is to behave with integrity, to be honest and to do the right thing at all times. Behaving ethically is underpinned by fairness, justice, inclusion and respect for diversity - and about ensuring that unfair discrimination is eliminated.

**A culture of listening:** NFCT CT commits to safe working practices that will be enhanced through a culture of listening to all of our stakeholders (Trustees, staff, volunteers, children, adults, parents, carers, partners **etc.**); gathering information from them regarding their experiences and priorities; and involving them in decision making. Using this input will assist NFCT CT to develop safeguarding policies, procedures and processes that promote ethical working.

### What examples are there that underpin NFCT CT's Ethical Working?

NFCT CT have developed numerous policies and procedures which support the organisations commitment to ethical working. **A number of examples of NFCT CT putting into practice this Ethical Working Policy are listed below:**

- **Anti-Bribery Policy:** Found in in NFCT CT's **Employee, Volunteer & Contractors Handbooks.**
- **Sharing of Information Policy:** Found in the Recording, Storing & Sharing of Information section of NFCT CT's **Safeguarding Handbook.**
- **Honest & Integrity Policy:** Found in NFCT CT's **Employee, Volunteer & Contractors Handbooks.**
- **Whistleblowing Policy:** Found in NFCT CT's **Employee, Volunteers, Contractors & Safeguarding Handbooks.**
- **Gifts & Hospitality Policy:** Found in in NFCT CT's **Employee, Volunteer & Contractors Handbooks.**
- **Recruitment of Ex-Offenders Policy:** Found in the Safer Recruitment section of NFCT CT's **Safeguarding Handbook.**
- **Corporate Hospitality Policy:** Found in in NFCT CT's **Employee, Volunteer & Contractors Handbooks.**
- **Parental & Child Consent Policy:** Found in the Safer Activities section of NFCT CT's **Safeguarding Handbook.**
- **Photography & Video Policy:** Found in the Additional Safeguarding Policies & Procedures section of NFCT CT's **Safeguarding Handbook.**

**In addition to the above, NFCT CT have developed [Codes of Good Safeguarding Practice](#) when working with children, young people and adults at risk, as well as [Codes of Conduct](#) for various different groups including Trustees, Staff & Volunteers, Participants and Adults.**

### Ethical Working and Safeguarding

Working ethically is never more essential than when NFCT CT is working with children, young people and adult at risk participants, as well as their parents, families, carers and advocates. **The foundation of safeguarding is ethical working, which in summary means that NFCT CT will:**

- Recruit and appoint Trustees, Staff and Volunteers using our **Safer Recruitment Procedures.**
- Induct Trustees, Staff and Volunteers to understand their accountabilities and responsibilities for the protection of all children, young people and adults at risk.
- Underpin all arrangements with participants, contractors, suppliers, partners, external organisations and other customers with our safeguarding ethos.

## Ethical Working Policy continued...

- Use all child and adults at risk safeguarding policies, procedures and processes to manage and - where necessary - report any safeguarding concerns.
- Support all safeguarding personnel to carry out their safeguarding responsibilities effectively.
- Ensure the ongoing coaching, training and development of all Trustees, Staff and Volunteers (as appropriate) to be effective in their safeguarding roles and to be able to fulfil their responsibility to protect all children and adults at risk.
- Value all of our Trustees, Staff and Volunteers and seek their input and contribution to the development of our Equality, Diversity, Inclusion, Anti-Discrimination and Ethical Working practices and best Safeguarding practice.

## Expectations of Trustees, Staff and Volunteers

NFCT CT firmly believes that by all Trustees, Staff and Volunteers adhering to this **Ethical Working Policy**, it will ensure that everyone is seen to behave in an appropriate way - which in turn will not only protect themselves and all NFCT CT Participants, it will also reduce the risk of allegations being made in the first place.

## Supporting Ethical Working

NFCT CT ensures that all Trustees, Staff and Volunteers receive induction training and on-going refresher training to enable them to be ambassadors of fairness, justice and inclusion, as well as to respect and celebrate diversity.

## What should I do if I suspect breaches of the Ethical Working Policy?

NFCT CT asks that all Trustees, Staff and Volunteers report any suspected breaches of this **Ethical Working Policy**.

Reports can be made to NFCT CT's Equality Diversity & Diversity Board or Staff Leads - whose contact details can be found on Page 4 of this Handbook. Alternatively, Trustees, Staff and Volunteers can either utilise the **Whistle Blowing Procedure** (to be found in the **Safeguarding Handbook**), or use the **Reporting Complaints Policy** which can be found at the end of this Equality, Diversity & Inclusion Policies and Procedures Handbook.

NFCT CT will also encourage all Participants (children, young people, adults and adults at risk) as well as their parents, families, carers and advocates to raise concerns about any breaches of this policy that they may encounter within the organisation. In this case all such reports should be made with reference to the **Complaints Policy & Procedure** within NFCT CT's **Safeguarding Handbook**.

**NFCT CT will always listen when issues are raised and take the appropriate action.**

## Monitoring Ethical Working

NFCT CT will regularly monitor the implementation of its **Ethical Working Policy** (along with all other linked Policies and Procedures which support ethical working) in order to assess whether fairness, justice, inclusion and respect for diversity is being achieved. Monitoring will take the form of observation and input for Trustees, Staff and Volunteers, as well as seeking feedback and input from all Participants, parents, families, carers and advocates **etc.**

**Where changes are required, NFCT CT will implement them without delay and keep under review the impact and effectiveness of those changes.**

**Reviewed & Updated: June 2021**

NFCT CT will review this **Ethical Working Policy** at least annually. In addition, more frequent reviews will be undertaken following any relevant change in legislation; as part of a process following the implementation of a new activity or service; and/or following any major equality, diversity and/or inclusion incidents within the CCO or Club.

## 8. Family Friendly Policy

**As part of the holistic approach to Equality, Diversity, Inclusion and Anti-Discrimination, NFCT CT have a number of additional Policies & Procedures which support the commitment to is committed to ethical and safe working practices in order to deliver our operations, activities and services in such a way so as to ensure that that no one is excluded.**

### What is meant by Family Friendly?

NFCT CT defines being family friendly as having in place policies that assist Staff to more easily balance their family responsibilities and their work responsibilities, whilst still being able to fulfil their obligations to both. Whilst many of these policies and the corresponding rights flow from Government statutory legislation, NFCT CT nonetheless aim to promote these in such a way as to make access to them as widely known as possible.

### What Family Friendly Policies are there?

NFCT CT believes that working ethically is to behave with integrity, to be honest and to do the right thing at all times. Behaving ethically is underpinned by fairness, justice, inclusion and respect for diversity - and about ensuring that unfair discrimination is eliminated.

<b>Maternity Leave Policy</b>	<b>Paternity Leave Policy</b>	<b>Adoption Leave Policy</b>
<b>Parental Leave Policy</b>	<b>Flexible Working Policy</b>	<b>Shared Parental Leave Policy</b>
<b>Domestic Emergencies Policy</b>	<b>Homeworking Policy</b>	<b>Time Off for Dependants Policy</b>

Further details about each of the above policies are detailed in NFCT CT's Employee Handbook - and further information about each is available from NFCT CT's CEO.

### Is there anything else?

Whilst not strictly specifically family focussed, there are a number of other policies and procedures that are designed to underpin NFCT CT's commitment to equality, diversity, inclusion and anti-discrimination. **These include, but are not limited to, the following areas:**

<b>Religious Holidays Policy</b>	<b>Compassionate Leave Policy</b>	<b>Religious Observance Policy</b>
<b>Grievance Policy</b>	<b>Capability Procedure</b>	<b>Special Unpaid Leave Policy</b>

Further details about each of the above policies and procedures are detailed in NFCT CT's Employee Handbook - and further information about each is available from NFCT CT's CEO.

**NFCT CT will continuously monitor its Family Friendly Policies and Procedures to ensure that it is able to offer appropriate support to all Staff in furtherance of its commitment to Equality, Diversity, Inclusion and Anti-Discrimination.**

**Reviewed & Updated: June 2021**

NFCT CT will review this **Family Friendly Policy** at least annually. In addition, more frequent reviews will be undertaken following any relevant change in legislation; as part of a process following the implementation of a new activity or service; and/or following any major equality, diversity and/or inclusion incidents within the CCO or Club.

## 9. Advertising, Recruitment & Selection Equality Policy

**It is NFCT CT's Policy that all Advertising, Recruitment & Selection will be conducted in such a way as to result in the selection of the most suitable person for the job vacancy in terms of relevant experience, abilities and qualifications - and without regard to unfair discrimination based upon protected characteristics.**

### NFCT CT's general approach to Advertising

**NFCT CT will ensure that all job advertisements will aim to positively encourage applications from all suitably qualified and experienced people. When advertising job vacancies, in order to attract applications from all sections of the community, NFCT CT will, as far as reasonably practicable:**

- 1. Ensure advertisements are not confined to those areas or publications which would exclude or disproportionately reduce the numbers of applicants with a particular protected characteristic.**
- 2. Avoid setting any unnecessary provisions or criteria which would exclude a higher proportion of applicants with a particular protected characteristic.**
- 3. Where vacancies are to be filled by promotion or transfer, they will be published to all eligible Staff and Volunteers in such a way that they do not restrict applications from employees with a particular protected characteristic.**

**NFCT CT may, as part of its commitment to its SMART Diversity Targets - and only as part of an objective process to address any identified areas of under-representation within its Trustees, Staff and/or Volunteer teams - advertise in such a way as to attract applicants from those under-represented groups. This is known as taking Positive Action and will only be used where it is a proportionate means of achieving a legitimate aim.**

**All recruitment activity will take place in compliance with NFCT CT's Policy on the Recruitment of Ex-Offenders detailed in the Safer Recruitment Section of the Safeguarding Handbook.**

### Consistent Selection Processes

All recruitment will be carried out with reference to NFCT CT's **Safer Recruitment Procedures** which are detailed in the Safeguarding Handbook. **In particular the following principles will apply to all selection processes:**

- a) The selection process will be carried out consistently for all vacancies and at all levels.**
- b) All applications will be processed in the same way.**
- c) All NFCT CT personnel responsible for short-listing, interviewing and selecting candidates will be clearly informed of the selection criteria and of the need for their consistent application.**
- d) Person specifications and job descriptions will be limited to those requirements that are necessary for the effective performance of the job.**

### Approach to Interviewing

- a) All applicants will be interviewed by at least two interviewers.**
- b) All questions asked of the applicants will relate to the requirements of the job.**
- c) All questions asked will in no way be discriminatory or otherwise personally intrusive.**
- d) The selection of new staff will be based on the individual's suitability and ability to do, or to train for, the job in question.**

## **Advertising, Recruitment & Selection Equality Policy continued...**

- e) If it is necessary to assess whether personal circumstances will affect the performance of the job, then this will always be discussed objectively, without detailed questions based on assumptions about any of the protected characteristics.

**For applicants with a disability, NFCT CT will always take into account its duty to make reasonable adjustments in order to ensure that a person with a disability is not placed at a substantial disadvantage in comparison with persons who do not have a disability.**

## **Monitoring the Equality of Advertising, Recruitment & Selection**

NFCT CT will regularly monitor the effectiveness of its **Advertising, Recruitment & Selection Equality Policy** (along with all other linked Policies and Procedures which support this particular Policy) in order to ensure that its selection processes, practices and procedures are consistent and fair and that equality of opportunity is being achieved. This monitoring will also consider whether there is any unintended and indirectly discriminatory effects on NFCT CT's recruitment processes.

**Where changes are required, NFCT CT will implement them without delay and keep under review the impact and effectiveness of those changes.**

**Reviewed & Updated: June 2021**

NFCT CT will review this **Advertising, Recruitment & Selection Equality Policy** at least annually. In addition, more frequent reviews will be undertaken following any relevant change in legislation; as part of a process following the implementation of a new activity or service; and/or following any major equality, diversity and/or inclusion incidents within the CCO or Club.



## 10. Access to Work Policy

**In support of NFCT CT's Advertising, Recruitment & Selection Equality Policy it actively encourages all applicants with a disability as well as existing staff and anyone else with health conditions or mental health conditions, to apply to the Government's Access to Work Scheme for a grant. NFCT CT will support all such applications as appropriate.**

### What is Access to Work?

Access to Work is a publicly funded employment support programme that aims to help more disabled people start or stay in work. An Access to Work grant can provide practical and financial support to people who have a disability or long term physical or mental health condition. How much might be awarded will depend on the personal circumstances of the individual.

### What are the qualifying criteria for an Access to Work Grant?

**For a person to be eligible to qualify for an Access to Work grant in relation to employment they must meet the following criteria:**

1. Have a disability, health condition or mental health condition that affects their ability to work.
2. Be aged 16 or over.
3. Live in England, Scotland or Wales.
4. Have a paid job, a job interview or be about to start a job, work experience or an apprenticeship.

### Further qualifying criteria includes the following...

5. The disability or health condition must either affect the person's ability to do a job, or mean they have to pay work-related costs **e.g.** special computer equipment.
6. The disability must either be likely to last at least a year, or have already lasted at least a year.
7. Where the person has a mental health condition, the condition must both affect their ability to do a job and mean they need support to start a new job, reduce absence from work, or stay in work.

### What can an Access to Work Grant be use for?

**If a grant is awarded it can be used for the following types of support:**

Purchase of special equipment	Fares to work if public transport cannot be used
A workplace support worker or job coach	A communicator at a job interview
Adaptations to existing equipment that is currently being used	

NFCT CT encourages all eligible applicants to apply for their Access to Work grant either before starting work or within six weeks of their commencement date as the grant may then cover all of the agreed costs, rather than just a proportion of them. Applications can be made at [gov.uk/access-to-work/apply](https://gov.uk/access-to-work/apply)

**Reviewed & Updated: June 2021**

NFCT CT will review this [Access to Work Policy](#) at least annually. In addition, more frequent reviews will be undertaken following any relevant change in legislation; as part of a process following the implementation of a new activity or service; and/or following any major equality, diversity and/or inclusion incidents within the CCO or Club.

## **11. Training, Promotion & Terms of Employment Equality Policy**

**It is NFCT CT's Policy that all Training, Promotion & Terms of Employment will be offered without regard to unfair discrimination based upon protected characteristics.**

### **Training for NFCT CT Line Managers**

All Line Managers will be trained in NFCT CT's policies and procedures related to Equality, Diversity, Inclusion and Anti-Discrimination to assist them in identifying and dealing with any breaches and/or discriminatory acts or practices.

### **Leading by Example**

NFCT CT expects all of its Line Managers to lead by example in terms of their behaviour and expectations in relating to Equality, Diversity, Inclusion and Anti-Discrimination within the teams that they are responsible for.

### **Training for NFCT CT Trustees, Staff and Volunteers**

NFCT CT will ensure that all Trustees, Staff and Volunteers receive induction training and on-going refresher training to help them understand their rights and responsibilities in relation to Equality, Diversity, Inclusion and Anti-Discrimination, as well what they can do personally to create a work environment that is free from discrimination and where diversity is respected and celebrated.

### **Non-Discriminatory Promotion System**

NFCT CT will ensure that where it operates a system of internal promotion that it will not be discriminatory. In addition any such internal promotional scheme will be checked from time to time to assess how it is working in practice. If it is identified that a group of staff who predominantly have a particular protected characteristic appear to be excluded from access to promotion, transfer and/or training and/or to other benefits - then the promotional system will be reviewed to ensure there is no unlawful discrimination.

### **Terms of Employment, Benefits, Facilities and/or Services**

NFCT CT will ensure that all terms of employment, benefits, facilities and services are reviewed from time to time, in order to ensure that there is no unlawful direct or indirect discrimination because of one or more of the protected characteristics.

### **Equal Pay and Equality of Terms**

NFCT CT is committed to equal pay and equality of terms in employment. It believes that all staff regardless of gender should receive equal pay where they are carrying out like work, work rated as equivalent under a job evaluation study or work of equal value. In order to achieve this, NFCT CT will endeavour to maintain a pay system that is fair and transparent, free from gender bias and based on objective criteria.

### **Annual Gender Pay Gap Reporting**

Where it is legally obliged to do so, NFCT CT will prepare and publish an Annual Gender Pay Gap Report in accordance with statutory requirements from time to time in force.

**Reviewed & Updated: June 2021**

**NFCT CT will review this Training, Promotion & Terms of Employment Equality Policy at least annually. In addition, more frequent reviews will be undertaken following any relevant change in legislation; as part of a process following the implementation of a new activity or service; and/or following any major equality, diversity and/or inclusion incidents within the CCO or Club.**

## 12. Religious Observance Policy

**It is NFCT CT's Policy to endeavour, on request, to alter a Staff member's working pattern so that breaks can be granted at times that coincide with their needs for religious observance. Alternatively, NFCT CT may, where practicable, endeavour to grant employees reasonable time off during their normal working hours for religious observance.**

### Assessing NFCT CT business needs

Whenever NFCT CT assesses whether it is practicable to grant time off to any staff member for religious observance, NFCT CT will take into account the needs of the business, as well as whether or not the arrangement would cause disruption to the work of the staff members wider team.

### Requirement to make up time

Where NFCT CT agrees to alter a staff members working pattern to grant time off for religious observance, this may mean that the staff member will be required to take a shorter lunch break, start work earlier and/or finish work later in order to make up the time off that was granted.

### Refusal of requests

Where a staff member requests time off for religious observance - at a time when their temporary absence would cause difficulties for the business, or the work of their team, or where the amount of time off requested is unreasonable or excessive - NFCT CT reserves the right to refuse to grant some or all of the time off requested.

### Equal treatment

All staff members will be treated equally with regards to requests for alterations to working patterns, or for time off, for the purposes of religious observance - regardless of their religion or belief.

### Quiet room

Where it is possible to do so, NFCT CT will seek to provide access to an unused office, meeting room or other quiet space for the purposes of allowing staff to pray or undertake religious observance. Any such room or space (if provided) is open to all NFCT CT staff of all religions, including those who are non-religious.

**Staff who make use of any quiet room or space (that might be provided by NFCT CT) for prayer, religious observance or quiet contemplation must respect the rights of other NFCT CT staff to observe their own religious or personal beliefs there.**

The provisions for time off for Religious Holidays is set out in the Leaves of Absence Policy in NFCT CT's Employee Handbook.

**Reviewed & Updated: June 2021**

NFCT CT will review this **Religious Observance Policy** at least annually. In addition, more frequent reviews will be undertaken following any relevant change in legislation; as part of a process following the implementation of a new activity or service; and/or following any major equality, diversity and/or inclusion incidents within the CCO or Club.

## 13. Transgender Equality Policy

**NFCT CT is committed to providing equality of opportunity for trans people throughout recruitment and employment, including supporting transgender Trustees, Staff and Volunteers through any transitioning process, removing any barriers to their recruitment and retention and ensuring they are treated with respect and dignity at work.**

### Definition of Terminology

**The terminology regarding trans people continues to evolve and therefore the below brief overview should only be considered as a starting point to better understand the language used in this Transgender Equality Policy.**

**The term Trans or transgender describes people whose gender identity differs from the sex they were assigned at birth. The terms are therefore just umbrella terms that cover people who:**

- a)** Are intending to undergo, are undergoing, or have undergone gender reassignment at any stage.
- b)** Identify as having a gender different from that which they were assigned at birth and are planning, or have had medical interventions, such as hormones or surgery.
- c)** Identify as having a gender different from that which they were assigned at birth, but who are not planning any medical intervention.
- d)** Are non-binary **i.e.** they do not identify as solely male or female, they may define themselves as both, neither or something entirely different and they may or may not have medical interventions to align their body with their non-binary gender identity.

**Please note that none of the above are to be considered as mutually exclusive alternatives.**

### How should I address a Transgender person?

How a transgender person chooses to describe themselves should be respected by all Trustees, Staff and Volunteers. Anyone who should be unsure as to how to correctly address a trans person is advised to ask them. The importance of doing this is because the use of inappropriate language and terminology can cause offence and distress.

**Please note that consistently addressing a transgender person by their previous name and/or an inappropriate pronoun will be regarded as harassment and NFCT CT will always take appropriate action.**

### What is Gender Reassignment?

Gender reassignment is the process of permanently transitioning from the gender assigned at birth to the person's correct gender identity.

### What is Transitioning?

Transitioning is the process undertaken by a trans person in order to bring their gender assigned at birth into alignment with their gender identity.

**However, transitioning does not necessarily need to involve any medical intervention or surgical procedures, as gender reassignment is considered to be a personal rather than a medical process. Transitioning may involve dressing differently, using a different name and pronoun and/or changing official documentation.**

## Transgender Equality Policy continued...

### How NFCT CT will ensure Transgender Equality in Recruitment

NFCT CT will ensure that any recruitment process (whether for Trustees, Staff or Volunteers) is inclusive of transgender applicants. **This will be achieved by the following design:**

1. Transgender applicants will be under no obligation to disclose their gender status or gender history.
2. Transgender applicants will not be asked questions about their gender identity or gender history during the recruitment process.

**The only exception to point 2 is for the purposes any equal opportunities monitoring undertaken by NFCT CT. However, no transgender applicant will need to disclose this if they do not wish to do so. Where a transgender applicant voluntarily chooses to disclose, this will never in itself be a reason for not offering a role with NFCT CT and it will be kept confidential.**

3. The gender in which an applicant chooses to present themselves will always be acknowledged and respected.
4. References will be requested using the applicant's correct name and gender since transitioning and previous names or gender identity will not be mentioned, unless the trans person specifically requests this.

**Document checks, such as Right to Work Checks and checks on Qualification Certificates, may be conducted as part of any recruitment process. NFCT CT recognises that these may be in a former name for a transgender applicant. NFCT CT will ensure that the process of checking is handled sensitively and with respect for the privacy of the individual. Any such documents containing former names - and thereby revealing gender history - will be stored securely, kept confidentially and only accessed by authorised named persons in accordance with NFCT CT's GDPR Data Protection Policy. Where it is not necessary to retain any document then they will be securely and confidentially destroyed.**

### How NFCT CT will ensure Transgender Equality in Employment

1. It will always be a staff members personal decision whether to reveal their gender status and history. NFCT CT will always respect their right to privacy.
2. Where a member of staff chooses to disclose information about their gender status or history, then this will always be treated as confidential - and such information will never be disclosed to any third party without the individual's consent.
3. A persons gender status or history will not have a bearing on any employment decisions or access to benefits, except where permitted or required by law.
4. All records that include details of a member of staff's gender history will be securely destroyed unless there is a specific reason for retaining them.
5. Where there is a need to retain documentation that shows the employee's gender history, it will be stored securely, kept confidentially and only accessed by authorised named persons in accordance with NFCT CT's **GDPR Data Protection Policy**.

### How NFCT CT will support a person who is Transitioning

**NFCT CT acknowledges that there is no right or wrong way for a transgender person to transition and is committed to supporting each person in making their own decisions on the transition process and the time it takes.**

Therefore, if a transgender staff member advises NFCT CT that they intend to transition at work, the line manager will aim to make the process as smooth as possible and will take steps to ensure they are supported and respected in any way that is appropriate. Accordingly the line manager will take the following steps:

## Transgender Equality Policy continued...

- Discuss with the transgender staff member when and how they will present at work in their new gender status.
- Discuss their preferences and wishes in relation to informing work colleagues and other relevant third party contacts.
- Expressly agree with them how and when this will happen, including who will be told, who will tell them and what they will be told (levels of disclosure may vary in detail for different types of work contact).
- Ensure that the transgender staff member is able to comply with NFCT CT's **Dress & Appearance Policy** in a way that reflects their gender identity and gender expression.
- Ensure that they can use single sex toilet and other facilities in accordance with their correct gender identity and clarify that they are not required to use accessible toilets unless they wish to do so.

**NFCT CT will deal with any concerns raised by others in a prompt and sensitive manner. However, for non-binary staff members, this might mean using accessible or single occupancy facilities, or using a combination of different facilities.**

- Arrange for any NFCT CT electronic records and/or security passes to be updated with any new name, title, pronoun or other personal identifiers **e.g.** photographs **etc.** to coincide with the date on which the transition at work commences. If required this will include creating a new work e-mail address for the staff member.
- Arrange for NFCT CT's paper records to be updated where possible.
- Discuss whether the member of staff wishes to be redeployed on a temporary or permanent basis **e.g.** if they are in a customer or public-facing role and wish to avoid having to answer intrusive questions about their gender status **etc.** Whilst NFCT CT will always seek to accommodate these wishes where possible, redeployment may not always be possible.
- Work with the staff member to develop a confidential action plan to clarify the actions that will be taken over the course of their transition at work, the dates by which these will be done and who is to be responsible for carrying them out. NFCT CT will take no action without the staff member's consent.
- Maintain confidentiality at all times.

**NFCT CT appreciates that transitioning is a process that takes time. Therefore, regular review meetings will be arranged between the line manager and the staff member to manage the process. The review meetings will also enable the action plan to be amended as and when things change.**

NFCT CT will grant any required time off work to attend transition-related medical and other appointments - or to undergo gender reassignment surgery - in accordance with the terms of the **Gender Reassignment Policy** which is detailed in NFCT CT's Employee Handbook. Any such authorised absences from work will not be counted for the purposes of absence monitoring.

## How NFCT CT will support Trans Equality

**NFCT CT will always fully support transgender staff and will demonstrate commitment to trans equality by:**

<b>Ensuring that all training courses that are delivered are fully inclusive of trans people</b>	<b>Including transgender staff in publicity and marketing materials</b>
<b>Ensuring that all forms and survey are inclusive of trans people</b>	<b>Including trans equality as a core part of our equality agenda and objectives</b>
<b>Including trans equality training in our equality, diversity and inclusion training</b>	
<b>Investigating fully all complaints of discrimination, harassment, victimisation, bullying or intimidation on the grounds of gender identity, gender expression, gender history or trans status.</b>	



## Transgender Equality Policy continued...

NFCT CT will not condone or tolerate any form of discrimination, harassment, victimisation, bullying or intimidation of transgender staff based upon their gender identity, gender expression, gender history or trans status - whether it is engaged in by NFCT CT Trustees, Staff, Volunteers or Participants, or by parents, families, carers, advocates, or by any third parties who do business with NFCT CT, such as stakeholders, contractors and/or suppliers.

### A Duty to Co-operate

Trustees, Staff & Volunteers have a duty to co-operate with NFCT CT to make sure that this **Transgender Equality Policy** is effective in ensuring equal opportunities and preventing the Discrimination, Harassment, Victimisation, Bullying or Intimidation of Transgender Staff.

### Consequences of Breaches

Action will be taken under the appropriate procedure against any person who is found to have committed any act of improper or unlawful Discrimination, Harassment, Victimisation, Bullying or Intimidation of Transgender Staff. Serious breaches of this **Transgender Equality Policy** could render NFCT CT Trustees, Staff and Volunteers liable to dismissal, or third parties to having their relationship with NFCT CT terminated.

**Appropriate action will be taken against any third party who is found to have committed an act of improper or unlawful discrimination, harassment, victimisation, bullying or intimidation against a transgender staff member. Everyone should bear in mind that they can be held personally liable for committing serious acts of harassment and may also be guilty of a criminal offence.**

This Transgender Equality Policy should be read alongside NFCT CT's Equal Opportunities Policy, the Dignity at Work Policy and the Anti-Bullying Policy - all of which include Gender Reassignment as a Protected Characteristic.

**Reviewed & Updated: June 2021**

NFCT CT will review this **Transgender Equality Policy** at least annually. In addition, more frequent reviews will be undertaken following any relevant change in legislation; as part of a process following the implementation of a new activity or service; and/or following any major equality, diversity and/or inclusion incidents within the CCO or Club.

## 14. Reporting Complaints Policy

**NFCT CT is fully committed to deal with all complaints and allegations of Discrimination, Harassment, Bullying, Victimisation, Intimidation and/or Detriment seriously, confidentially and speedily. NFCT CT will never ignore or treat lightly any complaints of improper or unlawful Discrimination, Harassment, Bullying, Victimisation, Intimidation and/or Detriment from any person.**

### Dealing with matters informally

NFCT CT encourages any Trustee, Staff member or Volunteer - who believes they are being subjected to Discrimination, Harassment, Bullying, Victimisation, Intimidation and/or Detriment - to notify the offender (by words or by conduct) that their behaviour or conduct is unwelcome.

However, NFCT CT also recognises that actual or perceived power and status disparities may make such confrontation impractical. In the event that this informal direct communication is either ineffective or impractical, or the situation is too serious to be dealt with informally, Trustees, Staff and Volunteers should follow the procedure set out on the next page.

### Who is this Reporting Complaints Procedure for?

The following Complaints Procedure is for the use by NFCT CT Trustees, Staff and Volunteers in relation to making a formal complaint about Discrimination, Harassment, Bullying, Victimisation, Intimidation or a Detriment. In addition, this Complaints Procedure may also be used to formally complain about a breach of any of NFCT CT's Equality, Diversity, Inclusion and Anti-Discrimination Policies and Procedures.

**Any participants, parents, families, carers and/or advocates wishing to make a formal complaint about Discrimination, Harassment, Bullying, Victimisation, Intimidation, a Detriment or any breaches of NFCT CT's Equality, Diversity, Inclusion and Anti-Discrimination Policies and Procedures will be directed to do so with reference to the Complaints Policy & Procedure outlined in NFCT CT Safeguarding Handbook.**

### What Complaints can be handled?

The Complaints Procedure will address any formal complaint made against an NFCT CT Trustee, Staff member, Volunteer or Participant, as well against any parent, family, carer, advocate, agency worker, contractor, supplier, visitor or any other third party.

### How can I support someone who makes a Complaint?

It is illegal for any person to victimise or retaliate against another person who has made allegations or complaints of discrimination, harassment, bullying, victimisation, intimidation or detriment, or who has provided information about such discrimination, harassment, bullying, victimisation, intimidation or detriment. NFCT CT will not tolerate any such behaviour and will take the appropriate action against any individual or group who behaves in such a way.

**NFCT CT expects everyone to support anyone who has made a complaint.**

**Appropriate action will be taken against any person who is found to have committed any act of improper or unlawful discrimination, harassment, bullying, victimisation, intimidation or detriment, or has been found to have breached any of NFCT CT's Equality, Diversity, Inclusion and/or Anti-Discrimination Policies and Procedures.**

**Reviewed & Updated: June 2021**

NFCT CT will review this **Reporting Complaints Policy** at least annually. In addition, more frequent reviews will be undertaken following any relevant change in legislation; as part of a process following the implementation of a new activity or service; and/or following any major equality, diversity and/or inclusion incidents within the CCO or Club.

## 15. Reporting Complaints Procedure

**All Trustees, Staff and Volunteers wishing to make a formal complaint about Discrimination, Harassment, Bullying, Victimisation, Intimidation and/or Detriment should do so promptly using the following Reporting Complaints Procedure.**

### ▪ Step 1

First of all, report the incident of harassment to your line manager.

**If you do not wish to speak to your line manager, you can instead speak to a more senior member of NFCT CT's management team or to a Trustee.**

### ▪ Step 2

All reports should be made promptly so that investigations may proceed and any action taken without any undue delay.

**NFCT CT reserves the right to arrange for another manager to conduct the investigation, other than the person with whom you raised the matter.**

### ▪ Step 3

All allegations will be taken seriously and will be promptly investigated.

**As part of the investigatory process, you will be interviewed and asked to provide a written witness statement setting out the details of your complaint.**

**Whilst confidentiality will be maintained during the investigation process to the extent that this is practical and appropriate in the circumstances, to be able effectively investigate an allegation, NFCT CT must be able to determine the scope of the investigation and the person or persons who should be informed of/or interviewed about the allegation. This will mean that the identity of the complainant and the nature of the allegations must be revealed to the person being complained about so that they are able to fairly respond to the allegations.**

### ▪ Step 4

Once the investigation has been completed, you will be informed in writing of the outcome and NFCT CT's conclusions and decision as soon as possible.

**NFCT CT is committed to taking appropriate action in respect of all complaints of discrimination, harassment, bullying, victimisation, intimidation and/or detriment which are upheld. Therefore, where a complaint is upheld NFCT CT will take the appropriate action against the person complained about.**

### ▪ Step 5

If your complaint is upheld and the person complained about remains at NFCT CT (following the appropriate action having been taken) then NFCT CT will take all reasonable steps to ensure that you do not have to continue working alongside this person if you do not wish to do so.

**In the above circumstances NFCT CT will discuss the options available with you.**

## Reporting Complaints Procedure continued...

### ▪ Step 6

If your complaint is not upheld, arrangements will be made for you and the person complained about to continue or resume working.

**In the above circumstances NFCT CT will work with you both to help repair working relationships.**

### Responsibilities and Accountabilities of NFCT CT Line Managers

NFCT CT Line Managers, who had knowledge that such discrimination, harassment, bullying, victimisation, intimidation or detriment had occurred within their teams, but who had taken no action to eliminate it will be subject to disciplinary action under the NFCT CT's formal Disciplinary Procedure.

### Alternative Procedures for reporting Complaints for Staff

NFCT CT Staff may opt to use the Grievance Procedure (detailed in NFCT CT's Employee Handbook) to raise a formal complaint related to discrimination, harassment, bullying, victimisation, intimidation or detriment.

### Alternative Procedures for reporting Complaints for Volunteer

NFCT CT Volunteers may opt to use the Complaints Procedure for Volunteers (detailed in NFCT CT's Volunteers Handbook) to raise a formal complaint related to discrimination, harassment, bullying, victimisation, intimidation or detriment.

**No person will ever be penalised for raising a complaint under this procedure, even if the complaint is not subsequently upheld, unless the complaint was both untrue and made in bad faith.**

**Reviewed & Updated: June 2021**

NFCT CT will review this **Reporting Complaints Procedure** at least annually. In addition, more frequent reviews will be undertaken following any relevant change in legislation; as part of a process following the implementation of a new activity or service; and/or following any major equality, diversity and/or inclusion incidents within the CCO or Club.

~ End of Equality, Diversity & Inclusion Policies and Procedures Handbook ~