



First Step
Sports Group

Equal Opportunities Policy



Objectives and commitments

First Step Sports is an Equal Opportunity Employer and is committed to ensuring that the terms and conditions of employment for you and potential employees are equitable and non-discriminatory. This means that job applicants, employees, suppliers and clients will be treated fairly irrespective of any of the 'Protected Characteristics' as defined by the Equality Act 2010. The protected characteristics are race, religion or belief, age, disability including mental health, gender re-assignment, marriage and civil partnership, pregnancy and maternity, sex and sexual orientation.

Stakeholders and Sub-Contractors who contract on our behalf or who deliver services are also required to comply with the policy. All clients and users of First Step Sports services will be entitled to be treated with respect and for their wishes, needs, and choices to be taken into consideration.

First Step Sports' duty to its clients and users extends to protecting them from discrimination from others and all employees, officers, stakeholders and sub-contractors will ensure that no discrimination is tolerated arising from third parties during or in connection with service delivery. First Step Sports will seek to promote equal opportunities and prevent harassment and bullying by publicising and communicating this policy; by providing appropriate training and guidelines for those with designated responsibilities and by raising awareness through staff development.

Further, we will continually monitor our policies and practices to ensure that these principles are upheld. It is your right to be treated with dignity and respect, respect, irrespective of any of the protected characteristics, which in turn will be conducive to performance, self-development and career advancement. Everyone, regardless of job role, has a responsibility to implement this policy.

Definitions:

- Discrimination – discrimination means treating people less favourably because of a protected characteristic they have or are thought to have (see perceptive discrimination below), whether this be direct or indirect by applying a provision, criterion or practice, which disadvantages such persons.
- Discrimination by Association – this is direct discrimination against someone because they associate with another person who possesses a protected characteristic.
- Perceptive Discrimination – is direct discrimination against an individual because others think they possess a particular protected characteristic. It applies even if the person does not actually possess that characteristic.



- **Discrimination Arising from Disability** – this is treating a disabled person unfavourably because of something connected to their disability where there is no objective justification. This only applies if an employer knows or could reasonably be expected to know that the person is disabled.
- **Sexual Orientation** – sexual orientation means sexual orientation for a person of the same sex, different sex or for persons of both sexes. It does not include sexual practices or preferences. Discrimination can occur based on a perception of a person's sexual orientation, even if that perception is wrong. It can also include discrimination against a person by reason of the sexual orientation of someone they associate with.
- **Age** – age is defined by the number of years an individual has lived.
- **Gender Reassignment** – gender reassignment means a desire to be known or to become a person of a gender different to that to which they were born. It includes someone who proposes to or has completed a process to change his or her gender.
- **Religion/Religious Beliefs** - religion or religious beliefs is defined as any religion, religious belief or similar philosophical belief. It does not include philosophical or political beliefs unless that belief is similar to a religious belief. Discrimination can occur based on a perception of a person's religion or beliefs even if that perception is wrong. It can also include discrimination against a person by reason of the religion or religious beliefs of someone they associate with.
- **Harassment** - harassment is defined as any hostile, unwanted unreasonable and/or offensive conduct related to a relevant protected characteristic, which adversely affects a person's dignity, self-confidence and well-being and creates a hostile environment and which leads to that person feeling intimidated, degraded or humiliated. A person is also protected from harassment because of perception and association.
- **Third party harassment** – an employer is liable for harassment of their employees by people (third parties) who are not employees of the organisation, such as clients and contractors. This will only apply if the harassment has occurred on at least two previous occasions and the employer has been made aware of this and has not taken reasonable steps to prevent this from happening again.
- **Racial Harassment** - racial harassment is defined as any action, conduct, comment, gesture or behaviour that is offensive, embarrassing, insulting or intimidating. It may include derogatory remarks, quips, jokes, innuendoes, taunts or physical abuse which is racially derogatory and potentially offensive and relates to a person's race, religion or ethnic origins.



- Sexual Harassment - sexual harassment is defined as:
 - a. Any action, conduct, comment, gesture or physical contact of a sexual nature that is unwelcome and might reasonably be seen by an employee or prospective employee as placing an implicit or explicit condition on employment.
 - b. Any persistent, unwelcome action, conduct, comment, gesture or physical contact of a sexual nature that is likely to cause offence, embarrassment or humiliation to an employee or creates an offensive working environment
- Bullying - bullying is defined as repeated treatment with the purpose of controlling individuals or making them insecure in their roles or treatment that has that effect.
- Victimization - victimisation occurs when an employee is subject to a detriment because of something they have done under or in connection with asserting their rights under any employment legislation or regulations. This will not apply if the complaint was maliciously made or if an individual supports an untrue complaint.

Positive Action – is allowed by the law to encourage disadvantaged groups who have been under-represented in particular works areas.

Monitoring

All Employees and job applicants will be asked to complete a form providing information regarding their age, sex, race, ethnic origin and whether they suffer from any disabilities. This form will be used solely for the purpose of monitoring the effectiveness of First Step Sports' equal opportunities policy and to ensure that First Step Sports meets its obligations as an Equal Opportunities Employer. It will not be taken into consideration of the person's suitability for the role.

Procedure for Discriminatory Conduct

Any member of staff may use the grievance procedure to complain about discriminatory conduct. The complaint will be taken seriously thoroughly investigated and considered based on the facts of the investigation. No individual will be penalised for raising such a grievance unless it is found to be patently untrue and made in bad faith. If the matter relates to harassment or bullying of any kind the anti-harassment and bullying procedure set out below should be followed.

Any employee who discriminates against any other employee or client because of a protected characteristic will be subject to our disciplinary procedure as set out in the grievance and disciplinary policy. In serious cases where such behaviour has been



deemed to constitute gross misconduct it will result in summary dismissal in the absence of mitigating circumstances. This statement should be read in conjunction with the anti-harassment and bullying procedure set out below.

First Step Sports recognises that its employees, officers, stakeholders, and sub-contractors are in turn entitled to respect for their rights. First Step Sports will not tolerate discriminatory action against anybody employed by it or acting on its behalf. First Step Sports therefore requires all staff etc, to notify their line manager or a Director in the event of inappropriate words, actions, or behaviour by any client or user of First Step Sports services.

In the event of a complaint arising, your line manager will advise as to the action to be taken. In emergency situations where advice of authority is not available, you are to act as you think right in the circumstances. If that includes the termination of First Step Sports services or terminating an activity such as a training course then you are authorised to take such steps.

Positive Action on Equal Opportunities

First Step Sports will regularly monitor the composition of the workforce and of job applicants. Should inequalities become apparent, lawful positive action will be taken to redress the balance including such measures as:

- Advertising jobs in ethnic or female interest publications as appropriate.
- Encouraging under-represented groups to apply for suitable posts or undergo training.
- Making contact with disabled candidates via the local job centre.
- Considering whether any reasonable adjustment can be made to work premises or the working arrangements to accommodate a disabled employee or job applicant.
- Introducing assertiveness training.

Anti Harassment and Bullying Procedure

As well as our commitment to equal opportunities, we are committed to providing a work environment for everyone, which is free from harassment or bullying because of a protected characteristic. This may include embarrassment, intimidation, threats or discrimination.

Reasonable measures will be taken to ensure that no employee is subject to harassment or bullying. In recognition of these principles First Step Sports does not condone any conduct, which may be construed as sexual harassment.

Any complaints of harassment or bullying should be made to First Step Sports who will



involve the relevant people to consider your complaint. The matter will be dealt with in a discreet and confidential manner and appropriate action will be taken. It is the duty of all employees and in particular management and supervisors, to ensure that the anti-harassment & bullying policy is implemented. Harassment or bullying will be taken to have occurred if a reasonable individual would feel that the behaviour was unwelcome or offensive.

Harassment and bullying are disciplinary offences that may in the most serious cases lead to dismissal. Individuals should be aware that in some circumstances they may be held personally liable for acts that are unlawful.

Incidents of sexual or racial harassment can be taken to amount to gross misconduct, which will be dealt with under First Step Sports' disciplinary policy and may lead to summary dismissal. Less serious infringements may lead to an apology from the harasser, letter of reprimand, suspension or relocation of the harasser.

In dealing with reports of harassment or bullying the following principles will apply:

- All reports will be taken seriously; treated in confidence and investigated by hr 180 who are independent of the situation (this may lead to an external, neutral third party being appointed to investigate the complaint).
- All complaints will be progressed and dealt with according to First Step Sports' grievance and disciplinary procedure.
- Where First Step Sports has reason to believe that there is a risk to the personal safety of the complainant or of another person, or that a criminal offence has been committed, we may take legal advice and/or inform the police before proceeding with any internal action.
- The victimisation or harassment of a complainant or the respondent, or any witnesses will be regarded as a disciplinary offence.
- Malicious complaints will be regarded as a disciplinary offence.

Sources and Methods of Recruitment

The recruitment process must result in the selection of the most suitable person for the job in respect of experience and qualifications.

Advertisement: Recruitment publicity must 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, First Step Sports will, as far as reasonably practicable:-



- Ensure advertisements are not confined to those areas or publications which would exclude or disproportionately reduce the numbers of applicants of a particular gender, racial group or disability;
- Avoid prescribing any unnecessary requirements which would exclude a higher proportion of a particular gender, racial group or disability;
- Avoid prescribing any requirements as to marital status;
- Avoid prescribing any requirements as to age;
- Publicise vacancies that may be filled by promotion or transfer, to all eligible employees in such a way that they do not restrict applications from employees of any particular age, race, gender, or those who have a disability;
- Not recruit new employees solely on the recommendation of an existing employee and without following due process;

Selection Methods

The selection process will be carried out consistently for all jobs at all levels. First Step Sports will ensure that this Equal Opportunities Policy is available to all staff and in particular is given to all staff with responsibility for recruitment, selection and promotion.

The selection of new staff will be based on the job requirements and the individual's suitability and ability to do, or to train for the job in question.

Selection Tests

If selection tests are used they will be limited to questions relating to the particular job and/or career requirements. The tests will measure the individual's actual or inherent ability to do or to train for the work or career. Thus, questions or exercises on matters that may be unfamiliar to racial minority applicants, applicants of a particular sex, or those who have a disability, will not be included in the tests if they are unrelated to the requirements of the particular job.

The tests that are used will be reviewed from time to time in order to ensure that they remain relevant and free from any unjustifiable bias, either in content or in scoring mechanism.

Applications and Interviewing

- All applications will be processed in the same way.
- The staff responsible for short-listing, interviewing and selecting candidates will be clearly informed of the selection criteria, and of the need for their consistent application.



- All questions that are put to the applicants will relate only to the requirements of the job.
- If it is necessary to assess whether personal circumstances will affect the performance of the job (for example, if the job involves unsociable hours or extensive travel) this will be discussed objectively, without detailed questions based on assumptions about race, age, sex, religion, national origin, sexual orientation, disability, marital status, children and domestic obligations.

Promotion, Transfer and Training

First Step Sports will take such measures as may be necessary to ensure the proper training, supervision and instruction for all staff in order to familiarise them with First Step Sports 's policy on Equal Opportunities, and in order to help them identify discriminatory acts or practices and to ensure that they promote equal opportunity at all times.

All persons responsible for selecting new employees, selecting employees for training, whether induction or promotion training, or for transfer to other jobs, will be instructed not to discriminate on gender or racial grounds and on the grounds of the employee's disability or sexual orientation.

Where a promotional system is in operation, the assessment criteria will be examined to ensure that they are not discriminatory.

The promotional system will be checked from time to time in order to assess how it is working in practice.

When a group of workers predominantly of one race, sex, or type of disability, is excluded from access to promotion, transfer and training and to other benefits, the promotional system will be reviewed to ensure that there is no unlawful, indirect discrimination.

Where general ability and personal qualities are the main requirements for promotion to a post, care will be taken to consider favourable candidates of all races, both sexes, and all classes of disability, with different career patterns and general experience.

Accessibility

We will endeavour to ensure individuals have the facilities and assistance to work wherever the need/client dictates. If the request is reasonable, we will make adjustments to the environment where possible.

