



QUEEN'S CLUB

EQUALITY AND DIVERSITY POLICY

1. EQUALITY AND DIVERSITY POLICY STATEMENT

The Club has adopted the following Equality and Diversity policy statement:

Queen's Club wishes to develop and maintain a demonstrably fair environment which (a) ensures that members, staff and guests are treated equally and with respect, and are free from unlawful discrimination, whether on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality, ethnic or national origin), religion or belief (or lack of religion or belief), sex and sexual orientation, and (b) provides equality of opportunity for its management and staff. Any allegations of discrimination will be taken seriously and responded to promptly.

Members, management, staff, coaches and guests are all required to comply with the legal requirements relating to the elimination of discriminatory practices, including harassment and victimisation. Members are subject to this policy in accordance with the Club's Rules and Code of Conduct as published on the Club's website. Members and staff are also required to follow the reporting procedure referred to below (which is the same as to the Club's procedure for Safeguarding).

For the avoidance of doubt, this is not a statement or policy as to how we manage our admission of members, where our selection criteria are determined primarily by sporting and social qualities. This is entirely about how we treat and respect all people using, visiting or working at the Club, whether members, staff, guests, coaches or contractors.

2. THE LEGAL REQUIREMENTS

The Equality Act 2010 legally protects people from discrimination in certain specified contexts, including (inter alia) at their work and as members of a private club. The Act identifies nine "Protected Characteristics" – namely age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality, ethnic or national origin), religion or belief (or lack of religion or belief), sex and sexual orientation.

It is against the law to discriminate against anyone because of any of these Protected Characteristics. People are also protected from discrimination if they are associated with someone who has a Protected Characteristic, (e.g. a family member or friend), or if they have complained about discrimination or supported someone else's complaint.

3. RECOGNISING DISCRIMINATION

It is important that members and staff understand the different types of discrimination, which can come in any one of the following forms:

- **Direct discrimination** – treating someone with a Protected Characteristic less favourably than others.
- **Indirect discrimination** – putting rules or arrangements in place that apply to everyone, but that put someone with a Protected Characteristic at an unfair disadvantage.
- **Discrimination by association** – discrimination against someone because they are associated with another person who has a Protected Characteristic.
- **Discrimination by perception** – discrimination against a person because of the belief that that person possesses a Protected Characteristic.
- **Harassment** – unwanted behaviour linked to a Protected Characteristic that violates someone’s dignity or creates an offensive environment for them.
- **Victimisation** – treating someone unfairly because they have complained about discrimination or harassment.

4. DESIGNATED PERSONS FOR EQUALITY AND DIVERSITY

The Club has designated specific members of staff, who have received specialist advice and training, to assume responsibility for ensuring that effective equality and diversity procedures are maintained.

The Club has appointed a Welfare Officer (“WO”), who is responsible for dealing with any safeguarding or equality and diversity concerns. In her absence, a Deputy Welfare Officer (“DWO”) will always be available for members and staff to consult with. The named persons are:

Welfare Officer (HR Director)

Olga Toombs

Work telephone number:

020 7386 3428

Mobile number:

07414 208320

Email: olga.toombs-welfare@queensclub.co.uk

Emergency contact number: 07414 208320

Deputy Welfare Officer (Sports Administrator):

Alison Quinlan

Work telephone number:

020 7386 3434

Mobile number:

07925 846140

Email: alison.quinlan-welfare@queensclub.co.uk

Emergency contact number: 07925 846140

The Welfare Officer is the main point of contact for all concerns relating to discrimination. Her role is to receive, assess and record information from members and staff who have concerns about discrimination, and to handle any ensuing investigations and enquiries. The WO’s role is also to ensure that all staff are aware of the law and know what to do if they are concerned that discrimination is taking place. The Welfare Officer will also provide advice and information to the Club’s board of directors as requested, liaise as necessary with relevant external agencies, and will review and update the policy in line with legislative and Club developments. In the absence of the Welfare Officer, the Deputy Welfare Officer will be the first main point of contact to receive and record information from members and staff.

5. EQUALITY AND DIVERSITY CONCERN REPORTING PROCESS

If you suspect that discrimination has taken place it is not your responsibility to take control of the situation nor to investigate and/or decide whether or not a discriminatory act has actually taken place. Your suspicions may arise directly from something you have observed or heard yourself, or indirectly from a disclosure made to you by someone else. However, in either case, you have a responsibility to report your concerns, or the concerns of others, immediately to the Club's Welfare Officer, or, in her absence, to the Deputy Welfare Officer. Should neither be available, or should you wish to report your concerns to a body outside the Club, you should get in touch with the Equality Advisory Support Service on 0808 800 0082.

6. RESPONDING TO A DISCLOSURE RELATING TO DISCRIMINATION

If a disclosure of discrimination is made to you, find an appropriately early opportunity to explain that the information will need to be shared with others – do not promise to keep secrets. Explain that you will share the information with the Club's Welfare Officer. As soon as possible after the disclosing conversation, make an objective and accurate note in writing of what was said, using the individual's own words. Note the date, time, any names that were involved or mentioned, and sign your record before reporting to the Welfare Officer. The Welfare Officer may ask you to formalise your report by asking you to complete a specific form designed for the purpose.

7. WHISTLEBLOWING

The Club has an open approach to concerns from whatever source and actively encourages whistleblowing. All concerns will be treated seriously and in the strictest confidence.

8. RESPONSE BY WELFARE OFFICER FOLLOWING REPORT OF ALLEGED DISCRIMINATION

The Welfare Officer will assist individuals reporting concerns to complete a specific form designed for the purpose, maintaining the confidentiality of the report made.

The Welfare Officer will consider the incident report and ensure that appropriate action, including if necessary external action, is taken. The Welfare Officer will inform the person who submitted the report if any external agency (for example the Equality and Human Rights Commission) has been contacted.

9. CONFIDENTIALITY

The Welfare Officer will keep accurate records of all equality and diversity concerns and will keep all sensitive information secure in accordance with the General Data Protection Regulation 2018.

Information will only be disseminated on a need-to-know basis by the Welfare Officer, taking advice from any necessary external agencies as appropriate.

Records of any allegation of discrimination will be stored securely and shared only with those who need to know about the incident or allegation. Disclosure information will not be kept for any longer than is absolutely necessary. This is generally a period of up to six months to allow for consideration and resolution of any disputes.

10. INTERNAL INQUIRIES AND SUSPENSION

The Welfare Officer will be in charge of all inquiries and investigations. Where a concern is raised, or if it becomes known that a member of staff or Club member is under investigation for matters of discrimination, the Welfare Officer, in liaison with the Chief Executive, will decide whether an individual should be suspended.

11. BREACHES OF THE DIVERSITY AND INCLUSION POLICY

Actions taken by staff or members that are in breach of the Club's policy will be addressed without delay and may ultimately result in dismissal/exclusion from the Club.

12. MONITORING AND REVIEW

The Club is committed to reviewing its Equality and Diversity Policy a year after any revision and then every three years. This policy was last revised in August 2018. The next review will be in August 2019.