

LTA Equality and Diversity Policy

1. Statement of Intent

The Lawn Tennis Association (LTA) is committed to tackling all forms of discrimination in order to make British tennis and the LTA as an employer more accessible and open to everyone. We will promote equality of opportunity across all equality groups in order to be considered a true leader and role model on equality issues. This Policy affirms this commitment and is binding for employees working for the LTA. This policy does not form part of any employee's contract of employment and the LTA may amend it at any time.

To achieve this we will continue to develop and implement practices that are welcoming of difference and accepting of diversity. The LTA aims to ensure that all people irrespective of their age, disability, ethnicity, gender, gender reassignment, HIV status, marital or civil partnership status, pregnancy or maternity, religion, sexual orientation or any other condition or requirement have a genuine and equal opportunity to be an LTA employee at all levels and in all roles. Under the Equality Act 2010 these categories are considered "protected characteristics" and they are legally protected against discrimination, harassment, bullying and victimisation. Whether any inappropriate action is by another employee or third party all incidents should be reported immediately to Human Resources or the Equality and Diversity Manager.

In pursuance of this Policy, the LTA may take special measures or positive action in favour of any group which is currently under-represented in its membership, representative bodies, or its workforce. Any positive action will be done in accordance with the law and not to the detriment of any other group. It is the responsibility of all LTA employees to ensure that the following Policy is understood as they have a personal responsibility to ensure it is implemented. Failure to do so may result in disciplinary action being taken. Any employee disciplinary matter will follow the process outlined in the Disciplinary Policy.

2. Legal Requirements

The commitments outlined within this Policy are underpinned by our legal obligations under the Equality Act 2010, Rehabilitation of Offenders Act 1974, Prevention from Harassment Act 1997, the Employment Act 2002, Part Time Workers (Prevention of Less Favourable Treatment) Regulations 2000, Fixed Term Employees (Prevention of Less Favourable Treatment) Regulations 2002 and the Human Rights Act 1998.

The LTA takes all claims of bullying, harassment, victimisation and/or discrimination by anyone involved with the LTA seriously and these claims will be dealt with through the appropriate disciplinary procedures.

Discrimination can take many guises and may not always be obvious to the perpetrator and therefore Employees need to be aware of the different types of discrimination. They are:

- (i) **Direct discrimination** is where someone is treated less favourably than another person because of a protected characteristic.
- (ii) **Discrimination by association** is direct discrimination against someone because they are associated with another person who possesses a protected characteristic.

- (iii) **Discrimination by perception** is direct discrimination against someone because the other person thinks they possess a particular protected characteristic.
- (iv) **Indirect Discrimination** occurs where the effect of certain requirements, provision or practices imposed by an organisation has an adverse impact disproportionately on one group or other. Indirect discrimination generally occurs when a rule or condition, which is applied equally to everyone, can be met by a considerably smaller proportion of people from a particular group; the rule is to their advantage and it cannot be justified on other grounds.
- (v) **Harassment** is defined as unwanted conduct that violates people's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment." In determining whether conduct can reasonably be considered as having such effect, the perception of the Complainant will be taken into account. Employees can now complain of behaviour they find offensive even if it is not directed at them.
- (vi) **Bullying** may be defined as behaviour which is offensive, intimidating, malicious, insulting or an abuse of power through means intended to undermine, humiliate, denigrate or injure.
- (vii) **Victimisation** is illegal and considered to take place when someone is treated badly because they have made/supported a complaint or grievance.

It is the aim of the LTA in its relationships with its employees and job applicants to ensure no individual is disadvantaged by imposing any conditions or requirements which cannot be justified. Failure to comply with Policy may result in disciplinary action being taken.

All employees:

- must comply with this Policy and have the right to invoke the Grievance Policy if they consider there has been unfair discrimination; and
- are expected to promote a culture free of discrimination and all forms of harassment, bullying and victimisation as outlined in the Dignity at Work Policy.

Any reported incidents of discrimination, harassment, bullying or victimisation will be investigated in accordance with the Disciplinary and/or Grievance Policies.

4. Objectives

The LTA's objectives outlined in the 2011 British Tennis Playbook clearly articulate the organisation's desire to grow British tennis and ensure it is accessible and welcoming to all who want to participate. Within these objectives there are key equality and diversity issues that individuals and teams need to address in order that the objectives are satisfied.

- **Improving places to play tennis**

The Equality and Diversity links within this objective are far reaching and not only cover attracting new and diverse groups, but also the need to ensure policies, practices and

behaviours of places to play clubs, coaches and members are not contrary to principles of equal opportunities and fair access.

- **Improving the support to coaches and the tennis workforce**

It is essential that coaches, competition organisers, clubs and volunteers have access to the information, training and advice offered by the LTA. This will ensure they are better equipped to understand how to work with diverse groups and what the relevant equality issues are to their role. It is essential that coach assessment, training and development explicitly addresses equality and diversity issues to be better positioned to attract and encourage participation from a wider group of people.

- **Increasing and improving junior and adult competition**

To retain and attract new people to tennis, competition is viewed as a vital component. Therefore to suit the diverse needs and interest of individuals, a variety of competition types is required. A robust and transparent process is also required individuals “ratings” and recording their results.

The principles of Equality and Diversity permeate through these LTA objectives and employees need to adopt and embrace the ethos of this Policy to ensure these objectives are achieved.

5. As an Employer the LTA will:

- Continue to lead by example in the development, treatment and consideration of our employees and their diverse needs;
- Operate an open and fair recruitment and selection process and encourage applications from all groups in the community;
- Embed the ethos of this Policy within the culture of the LTA;
- Require all employees to undergo equality and diversity training;
- Integrate equality and diversity principles within strategic objectives and articulate how organisational priorities will address issues of equality and diversity;
- Deter discrimination by making it clear that discrimination is unacceptable and will be treated as a serious disciplinary offence;
- Investigate any complaint of discrimination on any grounds in line with the LTA’s Disciplinary and/or Grievance procedure as appropriate;
- Monitor business and employee performance with regard to this Policy and evaluate these against working priorities;
- Regularly review the recruitment, selection and training procedures to ensure they are fair and reflect current best practice; and

- Regularly review the HR policies to ensure they are in line with best practice and all legal requirements.

6. Each LTA Manager is expected to:

- Lead by example, setting the standard of behaviour and always conducting themselves within the principles as outlined in this Policy;
- Be proactive in further developing their understanding of Equality and Diversity issues in order to become a better people manager;
- Adopt the principles of this Policy in the way they line manage employees, by recognising and supporting individual difference and treating everyone in a fair and equitable way;
- Ensure that all employees they manage understand their responsibilities under the Dignity at Work Policy;
- Effectively manage and deal with any complaint of discrimination including harassment, bullying and victimisation, by reporting the incident to Human Resources promptly and assisting with any subsequent investigation as appropriate; and
- In conjunction with Human Resources, ensure there is fairness in all employment practices they are involved with e.g. employee performance and recruitment of new joiners is based on merit and without regard to stereotypes and assumptions.

7. Each of our employees is responsible for:

- Ensuring that they understand the Policy and are clear about its implications i.e. that any breach of the Policy will be treated seriously and may lead to disciplinary action;
- Making sure their own behaviour is appropriate and they do not discriminate in any matter of employment or service delivery by treating employees, volunteers and tennis people fairly, respectfully and consistently;
- Not provoke or attempt to encourage other employees or volunteers to discriminate against, harass, bully or victimise other employees or volunteers; and
- Taking appropriate action if there are apparent breaches of the policy and contact Human Resources or the Equality and Diversity Manager.

8. The HR team will:

- Provide management information and support the evaluation of equality and diversity related issues such as disciplinary, grievance, training and employment.

- Provide as part of the induction programme for new joiners equality and diversity awareness training workshops within six months of joining.
- Ensure all complaints are investigated in line with the Discipline and/or Grievance Policies in a prompt, confidential and sensitive manner.

9. Monitoring

Diversity monitoring is considered an essential process that in order to understand the diversity within the LTA and those applying to work for the LTA. Through monitoring employees and applicants the LTA can identify any areas of underrepresentation and address those through changes in policy and practice. Furthermore by having a history of diversity monitoring it allows for trends and progress to be mapped over time, demonstrating how successful and intervention or project has been. All monitoring information is kept confidentially and in accordance with the data protection procedures.

The LTA is committed to monitoring all policies and procedures and reviewing and refining them in line with best practice. The Equality and Diversity Manager and Human Resources Team will be responsible for reporting periodically on progress towards achieving the aims of the Policy and on employee and applicant monitoring information.

10. Disciplinary and Grievance Procedures

As stated throughout the Policy, the LTA takes seriously all cases of harassment, bullying, discrimination and victimisation and will ensure that any such behaviour or that which is contrary to this Policy or its intent will be subjected to the appropriate disciplinary procedure. Any grievance should be raised with Human Resources or the Equality and Diversity Manager. No employee will be penalised for raising a grievance unless it is without foundation and not made in good faith.

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