



GBS Equality and Diversity Policy

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Definitions

“Bullying”	means any offensive, intimidating, malicious, or insulting behaviour involving a misuse of “power” that can make a person feel vulnerable, upset, humiliated, undermined, or threatened;
“Competition”	means an Event or series of Events conducted over one or more days, including a National or International Competition;
“Complainant”	means any Individual who feels they have been subject to a Grievance and wishes to present this issue under the procedure within the GBS Grievance Policy;
“Discrimination”	means being treated unfairly because of a characteristic that is legally protected by the Equality Act 2010 (“protected characteristics”);
“Diversity”	means celebrating differences and valuing everyone involved with GBS;
“Equality”	means allowing all groups of people to have a similar social position and receive the same treatment within GBS;
“Equality of Opportunity”	means ensuring all groups of people have access to the same opportunities within GBS;
“Event”	means a single race or contest;
“FIS”	means the International Ski Federation;
“GBS”	means GB Snowsport Ltd.;
“GBS Athlete”	means an athlete who is part of a GBS Team/GBS Squad;
“GBS CEO”	means the GBS Chief Executive Officer;
“GBS Staff”	means staff who are employed by, or acting as a consultant, to GBS;
“GBS Volunteer”	means volunteers who work for GBS without pay;

“GBS Website”	means the official GBS website; https://www.gbsnowsport.com/ ;
“Grievance”	means any complaint, problem, or concern that arises during the Complainant’s employment or programme. This may surround issues such as terms of employment, health and safety, work relations, organisational change, or unacceptable behaviour such as bullying, harassment, or discrimination;
“Harassment”	means any unwanted behaviour which is found to be offensive or which results in a feeling of intimidation or humiliation;
“Individual”	means anyone who is subject to the Policy;
“IOC”	means the International Olympic Committee;
“Protected Characteristic”	means a characteristic that is protected under the Equality Act 2010. Such characteristics include age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation;
“Respondent”	means an Individual who is defending against a Grievance claim if the Grievance raised concerns that Individual’s conduct;
“Third Party”	means any Individual or organisation and includes actual and potential clients, suppliers, distributors, business contacts, agents, advisors, and government and public bodies, including their advisors, representatives and officials, politicians and political parties;
“Unacceptable Behaviour”	means the behaviours of Bullying, Harassment, Discrimination, and Victimisation;
“Victimisation”	means any bad treatment directed towards someone who has made or is believed to have made or supported a complaint under this Policy or the Equality Act 2010.

1. Introduction

- 1.1. This document contains the GB Snowsport (GBS) Equality and Diversity Policy (the “Policy”). GBS is committed to the principles concerning Equality of Opportunity and is responsible for ensuring that no GBS Staff, GBS Athlete, GBS Volunteer, or other Third Party is unlawfully discriminated against because of their Protected Characteristics.
- 1.2. GBS recognises that we live in a diverse society and will endeavour to ensure that everyone is given the same opportunities regardless of their socio-economic backgrounds.
- 1.3. Equality and Diversity are interdependent and not interchangeable. There can be no Equality of Opportunity if difference is not valued and utilised.

Aims

- 1.4. To promote Equality and Diversity within GBS at all levels and in all aspects of GBS’ operations.
- 1.5. To prevent and address any unlawful Discrimination or other unfair treatment, whether intentional or unintentional, direct or indirect, against GBS Staff, GBS Athletes, GBS Volunteers, or other Third Parties that may preclude them from participating fully in snowsport.

Scope

- 1.6. The Policy applies to all GBS Staff, GBS Athletes, GBS Volunteers, and Third Parties and failure to comply will lead to disciplinary action in line with the GBS Disciplinary Policy. In addition, if your conduct is unlawful or illegal you may be personally or criminally liable with respect to civil and/or criminal proceedings, claims, or actions.
- 1.7. The Protected Characteristics referred to in the Policy include all those mentioned in the Equality Act 2010. These being age, disability, gender, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.
- 1.8. GBS recognises its legal obligations under the Equality Act 2010 and will abide by its requirements, as well as any equivalent legislation (as amended) in any UK jurisdiction, Jersey, Guernsey or the Isle of Man and any later amendments to such legislation or subsequent Equality related legislation that may be relevant to GBS.
- 1.9. The Policy is designed to be read in conjunction with the GBS Officials’ Code of Conduct, GBS Athletes’ Code of Conduct, the GBS Disciplinary Policy, the GBS Dignity and Respect Policy, and the GBS Grievance Policy that are published by GBS. These documents may receive revisions and updates occasionally, with the most up to date versions being available on the GBS Website.

2. Statement of Intent

- 2.1. Valuing Diversity, reducing inequality, and ensuring all people are treated with dignity and respect are fundamental to GBS. We make a firm commitment to developing and supporting all who are involved with the organisation.
- 2.2. GBS is committed to building an environment that values Diversity and tackles any form of Discrimination. We will promote Equality of Opportunity and will strive to be a role model on issues that concern Equality. What we outline within the Policy covers all aspects of the organisation and it is expected that all GBS Staff, GBS Athletes, GBS Volunteers, and Third Parties who work on behalf of, represent, or engage with GBS will follow the principles that the Policy presents.
- 2.3. Everyone who is involved with GBS is committed to the eradication of unlawful and unfair Discrimination and values the differences that a diverse workforce brings to the organisation. The Policy has been produced to try to prevent and address any unlawful and unfair Discrimination or other unfair treatment, whether intentional or unintentional, direct or indirect. GBS will uphold its internal values of passion, performance, and progression and will also promote dignity and respect throughout the organisation by means of the GBS Dignity and Respect Policy.

3. GBS' Commitments

- 3.1. GBS commits to:
 - 3.1.1. lawfully encourage Equality and Diversity within the GBS working and training environment, including, where suitable, the use of positive action, both as good practice and to ensure that the organisation thrives;
 - 3.1.2. create a zero-tolerance working environment free of Bullying, Harassment, Victimisation, and Discrimination ("Unacceptable Behaviour"), where individual differences and the contributions of all GBS Staff, GBS Athletes, GBS Volunteers, and Third Parties are recognised and valued. Achieving this is an important aspect of ensuring equal opportunities. Unacceptable Behaviour is addressed fully in the GBS Dignity and Respect Policy;
 - 3.1.3. take complaints of Unacceptable Behaviour seriously, dealing with upheld grievances appropriately;
 - 3.1.4. review practices and procedures when necessary to ensure fairness, and also update them as well as the Policy to take account of changes in the law;

- 3.1.5. monitor the demographic makeup of GBS regarding age, disability, gender reassignment (including identity), marriage, civil partnership, pregnancy, maternity, race (including colour, nationality, and ethnic or national origin), religion or belief, sex (gender) and sexual orientation to assist GBS in meeting the aims and commitments set out in the Policy. Data that is related to such things will be held both securely and anonymously and will not be held for longer than is reasonably necessary in accordance with data protection law and the GBS Data Protection Policy.

4. Unacceptable Behaviour

- 4.1. GBS Staff, GBS Athletes, GBS Volunteers, and Third Parties are entitled to a working environment that promotes dignity, Equality, and respect for all. GBS will not tolerate any acts of Unacceptable Behaviour committed against another member of GBS Staff, GBS Athlete, GBS Volunteer, or Third Party because of a Protected Characteristic.
- 4.2. GBS regards Unacceptable Behaviour as serious misconduct.
- 4.3. All complaints will be taken seriously and appropriate measures including disciplinary action may be brought against any GBS Staff, GBS Athlete, or GBS Volunteer who unlawfully bullies, harasses, discriminates against, or victimises any other person.
- 4.4. Further details on this subject can be found within the GBS Dignity and Respect Policy.

5. Reasonable Adjustments

- 5.1. When any decision is made about an Individual, the only personal characteristics that may be taken into account are those that are consistent with any relevant legislation and are relevant to the substance of the decision being made.
- 5.2. GBS recognises that it has a duty to make reasonable adjustments for disabled persons.
- 5.3. GBS will consider all requests for adjustments and where possible will accommodate reasonable requests and will work with disabled GBS Staff, GBS Athletes, GBS Volunteers, and Third Parties to implement any adjustments that will enable them to participate more fully in sports related activities.

6. Transgender Policy

- 6.1. The Policy also acknowledges that all transgender GBS Staff, GBS Athletes, GBS Volunteers, and Third Parties will be treated equally and that gender reassignment is a Protected Characteristic under the Equality Act 2010.
- 6.2. GBS will follow FIS' approach to transgender participation in Events and Competitions, so as to ensure that Events and Competitions remain fair and safe. FIS' approach has used the IOC guidelines.

7. Procedure

- 7.1. Any Individual who has suffered a breach or has reasonable grounds to suspect that someone may have breached the Policy may make a formal complaint in accordance with the GBS Grievance Policy.
- 7.2. During any investigation and consequent disciplinary proceedings, it may be necessary to ensure that the Complainant and the Respondent are not in close proximity to each other. For example, this may necessitate that one or both parties be suspended on full pay or making other temporary changes to arrangements pending the outcome of the investigation, if circumstances require.
- 7.3. Where the complaint is about a Third Party, we will consider what action may be appropriate to protect the Individual, and anyone involved, pending the outcome of the investigation, bearing in mind the reasonable needs of the business and the rights of that person. Where appropriate, we will attempt to discuss the matter with the Third Party.

8. Appeals

- 8.1. If Individuals are not satisfied with the outcome of the GBS Grievance Policy's Formal Procedure, they may Appeal in writing in accordance with Clause 5 of the GBS Grievance Policy.

9. Violation of this Policy

- 9.1. Failure to comply with the Policy will result in the application of the GBS Disciplinary Policy.
- 9.2. Any member of GBS Staff, GBS Athlete, GBS Volunteer, or Third Party who has reasonable grounds to suspect that another member of GBS Staff, GBS Athlete, GBS Volunteer, or Third Party may be in breach of any of the Clauses within the Policy are required to inform the GBS CEO. No Individual will be victimised for informing the GBS CEO about confirmed or suspected policy breaches.

Appendix A: Forms of Discrimination

A 1.1. Unlawful Discrimination can take the following forms:

Direct Discrimination

A 1.2. This form of Discrimination is to deliberately treat an Individual less favourably than another person because of a Protected Characteristic without a lawful exception to do so. For example, by refusing to employ a woman because she is pregnant.

Indirect Discrimination

A 1.3. This form is to apply a provision, criterion, or practice that creates a disadvantage for a person because of one of the Protected Characteristics in the absence of proportionality and a legitimate aim. For example, requiring a job to be done full-time rather than part-time would adversely affect women because women generally have greater childcare commitments than men.

Disability Discrimination

A 1.4. This form can be direct or indirect Discrimination and is any unjustified less favourable treatment because of the effects of a disability, and failure to make reasonable adjustments to alleviate disadvantages caused by a disability.

Associative Discrimination

A 1.5. This form is where an Individual is discriminated against, harassed, or potentially victimised because of their association with another Individual who has a Protected Characteristic. For example, not employing a mother because she has a disabled child (excluding marriage, civil partnership, pregnancy, or maternity. However, pregnancy or maternity may fall within a claim for sex Discrimination because of association with a pregnant woman or a woman on maternity leave).

Perceptive Discrimination

A 1.6. This form is where an Individual is discriminated against or harassed based on a perception that they have a Protected Characteristic outlined above when they do not, in fact, have that Protected Characteristic (excluding marriage, civil partnership, pregnancy, or maternity).

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