

**Diversity &  
Inclusion**



**FOR ALL**

**Equality Policy**

**April 2024**

## **Policy Objectives**

1. The Royal Air Force (RAF) Football Association (FA) is fully committed to the principles and practice of equality of opportunity in all its functions. It is responsible for ensuring that all its members, both military and civilian, remain lawful and are free from discrimination against any of the nine protected characteristics. These protected characteristics, as laid out within the Equality Act 2010, are:

- a. Age.
- b. Disability.
- c. Gender reassignment.
- d. Marriage and civil partnership.
- e. Pregnancy and maternity.
- f. Race.
- g. Religion or belief.
- h. Sex / gender.
- i. Sexual orientation.

2. The RAF prides itself on its ethos and core values. These core values are Respect, Integrity, Service and Excellence and are at the heart of everything that the organisation does and achieves.<sup>1</sup> The RAF aims to build a culture that maintains these core values and supports an environment surrounded by mutual respect, openness, fairness and transparency.

3. To that end, all employees, whether regular, reserve, volunteer, civilian or dependant are responsible for the endorsement, promotion and advancement of this RAF FA Equality Policy. The RAF will also encourage the other Services and partner organisations to adopt and demonstrate their commitment to the principles and practice of equality as set out in this Policy.

## **Purpose of the Policy**

4. The RAF FA recognises that individuals (and / or certain groups in society who share one or more protected characteristics) may not have been able to participate equally and fully in sporting related activities in the past, namely football. This Policy has been produced to try to prevent and address any unlawful discrimination or other unfair treatment, whether intentional or unintentional, direct or indirect, against personnel that may preclude them from participating fully in football-related activities.

5. The RAF FA recognises the diversity of provision that is required in order to ensure that all personnel regardless of their protected characteristics or social or economic background can access football and develop at a level that is appropriate to them.

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<sup>1</sup> Air Publication 1 – the Values and Standards of the RAF refers.

6. The RAF FA recognises the need to provide different and diverse opportunities as a means of creating entitlement and access. In addition, the RAF FA recognises that we live in a diverse society and will endeavour to ensure that all personnel are given the same opportunities regardless of their protected characteristics and / or socio-economic backgrounds.

7. Internally, the RAF FA is fully committed to the elimination of unlawful and unfair discrimination and values the differences that a diverse workforce brings to the organisation. This Policy has been produced to try to prevent and address any unlawful discrimination or other unfair treatment, whether intentional or unintentional, direct or indirect, against its members.

## Legal Requirements

8. The RAF FA is required by law not to unlawfully discriminate against its members and recognises its legal obligations under, and will abide by the requirements of, the Equality Act 2010, and 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 the RAF, such as the Armed Forces Act.

9. The RAF FA will seek advice, through the RAF lead for D&I Policy<sup>2</sup>, each time this Policy is reviewed to ensure it continues to reflect the current legal framework and good practice.

10. The RAF FA recognises any form of discrimination, harassment, bullying or victimisation to be deemed unacceptable. Unlawful discrimination can take the following forms:

a. **Direct Discrimination:** treating someone less favourably than you would treat others because of a protected characteristic.

b. **Indirect Discrimination:** applying a provision, criterion or practice which, on the face of it, applies equally to all but which, in practice, can disadvantage individuals with a particular protected characteristic. Such requirements or conditions are lawful only if they can be objectively justified.

c. **Harassment:** engaging in unwanted conduct relating to a relevant protected characteristic or unwanted conduct of a sexual nature where the conduct has the purpose or effect of violating the recipient's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for the recipient, or any other individual affected by such conduct. The RAF FA is committed to ensuring that its members are able to conduct their activities free from harassment of any kind.

d. **Bullying:** the misuse of power or position to criticise persistently or to humiliate and undermine an individual's confidence.

e. **Victimisation:** subjecting someone to a detriment because they have in good faith taken action under the Equality Act 2010 (or equivalent legislation) by bringing proceedings, giving evidence or information in relation to proceedings, making an allegation that a person has contravened the Equality Act 2010 (or

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<sup>2</sup> Point of contact: Allen, Marie-Clare Wg Cdr (Air-COSPers-Pol Inclusion SO1) <Marie-Clare.Allen622@mod.gov.uk>.

equivalent legislation) or doing any other thing for the purpose of, or in connection with, the Equality Act 2010 (or any equivalent legislation).

11. The RAF FA regards discrimination, harassment, bullying or victimisation, as described above, as serious misconduct. All complaints are to be directed through the RAF FA Equality, Diversity and Inclusion Advisor (RAF FA EDIA)<sup>3</sup> for their appropriate action and reporting. All complaints will be taken seriously and appropriate measures, including disciplinary action or removal from service, may be brought against any person who unlawfully discriminates against, harasses, bullies or victimises any other.

### Reasonable Adjustments

12. 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 applicable to the substance of the decision being made. The RAF FA recognises that it has a duty to make reasonable adjustments for disabled persons. The duty to make reasonable adjustments includes the removal, adaptation or alteration of physical features, if the physical features make it impossible or unreasonably difficult for disabled people to make use of services. In addition, when acting as a service provider, the RAF FA has an obligation to think ahead and address any barriers that may impede disabled people from accessing its service.

13. The RAF FA will consider all requests for adjustments and where possible will accommodate reasonable requests and will work with disabled personnel to implement any adjustments that will enable them to participate more fully.

### Transgender Athletes

14. The RAF FA is subject to criteria laid out in the Equality Act 2010 and The FA's regulations<sup>4</sup>. The RAF FA considers football to be a gender-affected sport of a competitive nature where the physical strength, stamina or physique of an average person of one sex could put them at a disadvantage compared to average persons of the other sex as competitors in a football match.

15. The RAF FA believe that football belongs to, and should be enjoyed by, anyone who wants to participate in it. It is the RAF FA's firm view that gender identify should not be a barrier to participation in football. The RAF FA is intent on making football a lifelong experience and ensuring the inclusion and safety of all participants. However, the RAF FA must consider safety as a priority to any participation in football, especially at a competitive level. Individuals may be eligible to participate in non-FA affiliated football in their affirmed gender, subject to RAF FA approval<sup>5</sup>. This approval will consider:

a. **Safety.** Hormonal changes brought about by puberty may result in safety issues. This is due to a general distinction between males and females in sport because of different muscle strength caused by testosterone. The RAF FA must consider the safety of the applicant, as well as that of the other players.

b. **Fair Play.** Fair play issues may arise due to potential differences between the sexes, and the fact that oestrogen and testosterone (which is often taken as part

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<sup>3</sup> The lead RAF FA EDIA is Wing Commander Katy Steed, [katy.steed@shape.nato.int](mailto:katy.steed@shape.nato.int).

<sup>4</sup> The FA Policy on Trans People in Football dated Sep 2015 refers, [https://www.thefa.com/-/media/files/thefaportal/governance-docs/equality/lgbt/trans-updates-2015/10360\\_fa-policy-on-trans-people-in-football.ashx?la=en](https://www.thefa.com/-/media/files/thefaportal/governance-docs/equality/lgbt/trans-updates-2015/10360_fa-policy-on-trans-people-in-football.ashx?la=en).

<sup>5</sup> Approval must be gained by the CEO, with consultation by the IAG Chair and RAF FA Lead EDIA.

of an individual's gender reassignment) can have physical effects which may lead to competitive advantages.

16. If any player wishes to play in competitive FA-affiliated football then they will need to apply for a clearance certificate from The FA<sup>6</sup>. The RAF FA will provide advice, guidance and support in undertaking this process.

## **Responsibility, Implementation and Communication**

17. The following responsibilities will apply:

a. The RAF FA Board of Trustees and Executive Committee are responsible for ensuring that this Equality Policy is implemented, followed, and reviewed when appropriate. They are also responsible for ensuring that this Equality Policy is enforced and any breaches are dealt with appropriately. The RAF FA Chairman<sup>7</sup> has the overall responsibility for the implementation of this Equality Policy.

b. The RAF FA Director of ED&I<sup>8</sup> will ensure that Inclusivity is included as an agenda item at every Board of Trustees meeting, and that the Board takes equality issues into consideration when making decisions.

c. The RAF FA Chairman, in conjunction with the Director of ED&I, will appoint a member of staff to be the lead RAF FA EDIA<sup>9</sup>. The RAF FA EDIA shall work in conjunction with the Director of ED&I and will have the overall day-to-day responsibility for the implementation of this Equality Policy and for achieving any equality related actions resulting from it. An internal equality and diversity network (the Inclusivity Advisory Group (IAG)) also exists to provide additional support, which shall be chaired by the RAF FA EDIA.

d. Objectives relating to fair and inclusive practices will be included in all employees' performance indicators, via the Joint Portal for Administration (JPA) and will form an integral part of performance reviews throughout the year.

18. This Equality Policy will be implemented as follows:

a. The RAF FA will establish an Equality Action Plan which shall include a review of its policies and practices on an ongoing basis, to ensure continuing compliance with relevant legislation, demographics and internal business requirements and, where possible, good practice.

b. The RAF FA will develop and cascade a diversity vision statement<sup>10</sup>.

c. The RAF FA will develop and cascade other applicable policies, procedures and statements required to further this Equality Policy and the objectives of equality and diversity generally. The RAF FA will also maintain, develop and cascade, as appropriate, current related policies.

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<sup>7</sup> The RAF FA Chairman is Gp Capt Jon Smith.

<sup>8</sup> The RAF FA Director of ED&I is Wing Commander Louise Hancock, [louise.hancock906@mod.gov.uk](mailto:louise.hancock906@mod.gov.uk).

<sup>9</sup> The lead RAF FA EDIA is Wing Commander Katy Steed, [katy.steed@shape.nato.int](mailto:katy.steed@shape.nato.int).

<sup>10</sup> [20180305-RAF FA DI Leaflet.pptx \(sharepoint.com\)](#).

d. The RAF FA will join appropriate organisations to network, promote and exchange best practice.

19. This Equality Policy will be communicated in the following ways:

a. The Policy will be included in the RAF FA Handbook<sup>11</sup> (or any equivalent paper or electronic documents). Reference will be made to this Equality Policy in any code of conduct. This Equality Policy is for guidance only and will not form part of any contract of employment.

b. The Policy will be highlighted in all staff and volunteer inductions within the RAF FA.

c. A copy of this Equality Policy will be publicly available on the RAF FA's website<sup>12</sup> and copies in other formats will also be available when requested.

d. The RAF FA will promote and deliver continuing professional development for all members to support equal opportunities within the organisation. This will include annual 'Face It, Fix It' training and RAF FA specific continued development.

e. The RAF FA will produce, maintain and monitor an Equality Action Plan to ensure the objectives of this Equality Policy are consistently delivered throughout all areas of the organisation.

f. The RAF FA recognises that, in some cases, to further the principle of equality, an unequal distribution of resources may be required. If appropriate and proportionate, and to the extent that is lawful, the RAF FA will consider positive action or may introduce special measures to assist any group with a protected characteristic which is currently underrepresented within any group of personnel.

g. The RAF FA will reference and include a copy of this Policy as part of its contractual agreements with consultants and other service-providers.

20. The RAF FA's aspiration is to reflect the diverse nature of the personnel it supports. All imagery captured or used within any media outlet (public or private) should reflect this aspiration.

## **Monitoring and Evaluation**

21. This Equality Policy will remain in force until it is amended, replaced or withdrawn. A review of this Equality Policy will take place as and when required, but not less than once every three years.

22. The Equality Action Plan, created to ensure the objectives of this Equality Policy are delivered, will be reviewed by the Director of ED&I regularly. Progress relating to the Policy will be recorded annually and a full report will be presented to the Chairman to debate progress and review the policy status. This shall include statistical and, if appropriate, qualitative information will be collected. Once approved by the Chairman, a report will be published internally and externally (with due regard to the sensitivity of the information), to

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<sup>11</sup> <https://book.flipboxapp.net/client/royal-air-force--28county-29-football-association-handbook-2022-23>.

<sup>12</sup> <https://www.royalairforcefa.com/about/diversity-and-inclusion>.

show the impact of this Equality Policy and progress towards achieving the Equality Action Plan.

### **Complaints Procedures**

23. To safeguard individual rights under this Equality Policy, any person who believes they have suffered inequitable treatment within the scope of this Equality Policy may raise the matter through their local EDIA, Unit or chain of command where appropriate. In the event that it is a complaint regarding this Policy or another policy regarding the RAF FA, the complaint shall be directed to the Chairman unless otherwise prescribed in that policy.

24. Where assistance is needed in identifying the appropriate procedure, the RAF FA EDIA may assist in the first instance (without comment on the merits of the complaint).

25. Appropriate action may be taken against any RAF FA personnel who is found to have violated this Equality Policy.

26. This Equality Policy was approved by the RAF FA Chairman on 1 April 2024.