Equality, Diversity & Inclusion Policy

Brampton Park Golf Club · based on the England Golf model policy

Approved: 20 October 2026 **Effective from:** 20 October 2026 **Applies to:** everyone at the Club

1. Our commitment

1.1 Brampton Park Golf Club is committed to equality, diversity and inclusion across its members, visitors, customers, volunteers and staff.

1.2 Everyone should play their part in making golf inclusive. We aim to make sure that all people, whatever their background, ability or Protected Characteristics, have a genuine and equal opportunity to work at the Club, become a member, play golf here and take part in Club life.

1.3 We will build these values into everything we do, and we will not disadvantage anyone by imposing conditions or requirements that cannot be justified.

1.4 Our commitment to equality for our employees is set out in the Employee Handbook.

2. Purpose

2.1 This policy sets out the responsibilities of everyone it applies to, and promotes fairness, equality, diversity and respect for everyone who plays, works, volunteers or uses the Club's facilities.

3. Who this policy applies to

3.1 This policy applies to, and is binding on, the Club, its Owners, staff, members, visitors, players, volunteers, committee members, coaches, contractors, agents and anyone acting for or on behalf of the Club.

4. The law

4.1 The Club will comply with all relevant legislation, as amended from time to time, including:

- the Equality Act 2010, and the Worker Protection (Amendment of Equality Act 2010) Act 2023;
- the Protection from Harassment Act 1997;
- the Human Rights Act 1998;
- the Employment Act 2002, the Part-time Workers (Prevention of Less Favourable Treatment) Regulations 2000 and the Fixed-term Employees (Prevention of Less Favourable Treatment) Regulations 2002;
- the Data Protection Act 2018 and the UK GDPR.

4.2 The Equality Act allows some differences in treatment. Sections, membership categories and competitions based on sex or age, such as our Ladies', Men's, Seniors' and Junior Sections, are lawful, as are separate competitions where strength, stamina or physique affect the result.

5. What the Club will do

5.1 Encourage everyone to get involved in golf, whatever their background, ability or Protected Characteristics.

5.2 Run all competitions, events and activities fairly and equitably, except where specific circumstances prevent this or where Positive Action is needed.

5.3 Review all Club policies and procedures to make sure they comply with this policy, including making reasonable adjustments for disabled golfers, for example through our Buggy Policy.

5.4 Where it monitors the diversity of members, players and volunteers to understand who uses the Club, do so voluntarily and anonymously wherever possible, in line with our Privacy Policy, the UK GDPR and the Data Protection Act 2018.

5.5 Provide appropriate training and support to staff, volunteers, officials and contractors on their responsibilities under this policy.

5.6 Take reasonable steps to prevent harassment, including sexual harassment, of staff and anyone else at the Club.

5.7 Publish this policy on its website.

6. Raising a concern and breaches

6.1 The Club takes seriously every report of inappropriate behaviour, bullying, harassment, victimisation or discrimination, whether direct or indirect, by anyone this policy applies to.

6.2 To raise a concern, speak to or email the Golf Operations Manager or the office at **admin@bramptonparkgc.co.uk**, or call 01480 434700. Concerns about the safety of a child or an adult at risk should go straight to our Club Welfare Officer, Dave Humphreys, on 07540 323182 or **cwo@bramptonparkgc.co.uk**.

6.3 Alleged breaches will be dealt with under the Club's Disciplinary Policy, or for staff the grievance and disciplinary procedures in the Employee Handbook.

6.4 Nobody will be treated less favourably for raising a concern in good faith.

7. Review

7.1 This policy is reviewed by the Owners at least every three years, and sooner if the law changes. Any changes take effect from the date stated.

Appendix 1: Discrimination

Everyone this policy applies to must not act in a way that is directly or indirectly discriminatory, and must make reasonable adjustments to avoid discriminating against anyone with a Protected Characteristic. Failure to do so is a breach of this policy and may also break the Equality Act 2010.

Protected Characteristics

Section 4 of the Equality Act 2010 lists nine: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.

Direct discrimination

Defined in section 13(1): "A person (A) discriminates against another (B) if, because of a protected characteristic, A treats B less favourably than A treats or would treat others." For example, a decision that treats women less favourably than men because of their sex.

Indirect discrimination

Defined in section 19(1): a person applies a provision, criterion or practice which puts people with a Protected Characteristic at a particular disadvantage and which cannot be justified. For example, a rule that club competitions can only be played on Saturdays could disadvantage members whose religion prevents them playing on that day.

Indirect discrimination is often unintentional, and it is no defence to say the effect was not intended. Complaints should be considered carefully and objectively, and not dismissed because the effect was unexpected. Discrimination can also arise from failing to act.

Reasonable adjustments

Everyone this policy applies to must make reasonable adjustments to avoid discriminating against a person with a Protected Characteristic. It is not unreasonable for an adjustment to cost time or money, but an adjustment may not be reasonable if the cost is disproportionately high or it would be unworkable, for example when it would be unsafe or cause serious damage to the course.

Positive Action

In limited circumstances it can be lawful to take Positive Action to help an under-represented group. Positive Action must be reasonable, justifiable and clearly linked to a legitimate aim.

Examples in golf of unlawful discrimination

- Refusing to allow buggies for disabled golfers simply because they increase course maintenance costs.
- Restricting the number of peak-time tee times available to women.
- Refusing to consider playing competitions on alternative days to accommodate religious beliefs.

Appendix 2: Harassment

Harassment, defined in section 26(1) of the Equality Act 2010, is unwanted conduct related to a Protected Characteristic that has the purpose or effect of violating a person's dignity, or of creating an intimidating, hostile, degrading, humiliating or offensive environment for them.

In deciding whether conduct is harassment, we consider the perception of the person affected, whether it is reasonable for the conduct to have that effect, and the wider circumstances.

Sexual harassment is unwanted conduct of a sexual nature with the same purpose or effect. **A single incident** can be harassment. Under the **Protection from Harassment Act 1997**, a course of conduct amounting to harassment can be a civil, and sometimes a criminal, offence even if it is not linked to a Protected Characteristic.

Examples in golf of harassment

- Unwanted or inappropriate contact with staff or other golfers.
- Targeting disabled golfers who use buggies and demanding proof of their disability.
- Disproportionate public criticism of a person for irrelevant or personal reasons.

Appendix 3: Victimisation

Victimisation, defined in section 27(1) of the Equality Act 2010, happens when a person suffers a detriment because they have done a protected act, or are believed to have done one.

A **protected act** includes making a complaint or bringing legal proceedings about discrimination, harassment or another equality issue. A **detriment** is any less favourable treatment, such as a suspension, sanction, or verbal or physical aggression. It is enough to show the detriment was because of the protected act.

Examples in golf of victimisation

- Starting disciplinary action against someone because they complained of discrimination.
- Ignoring a person's valid input into the running of the club after they have made a complaint.
- Dropping a player from a team because they made a complaint.

Approval

Approved by: Greg Tack, Golf Operations Manager · **Signed:** GT · **Date approved:** 20 October 2026