

Sutton Tennis & Squash Club

Anti-Discrimination, Harassment, Bullying & Sexual Harassment Policy

For employees, workers, casual staff, volunteers, coaches, contractors and anyone acting on behalf of the Club

Version	2026-1
Policy owner	Management Committee
Approved by	Management Committee
Effective date	30 October 2026
Review date	October 2027, or earlier following a material legal or operational change
Policy statement Sutton Tennis & Squash Club is committed to a safe, inclusive and respectful environment. Discrimination, harassment, sexual harassment, bullying and victimisation are not tolerated. Concerns will be listened to, taken seriously and handled fairly, promptly and sensitively.	

1. Purpose

Sutton Tennis & Squash Club (the Club) is committed to providing a working and volunteering environment in which everyone is treated fairly, with dignity and respect. This policy explains the standards of behaviour expected, the conduct that is unacceptable, the preventative steps the Club will take and how concerns can be raised and addressed.

The Club will take appropriate and proportionate steps to prevent discrimination, harassment, sexual harassment, bullying and victimisation, including taking all reasonable steps to prevent sexual harassment and third-party harassment.

2. Scope

This policy applies to employees, workers, casual and agency staff, apprentices, volunteers, committee members, coaches, contractors and consultants, regardless of role, status or seniority. It also sets expectations for members, guests, visiting teams, spectators, parents and carers, suppliers and other third parties when interacting with Club personnel.

It applies wherever work or Club-related activity takes place, including:

- the clubhouse, bar, catering areas, kitchens, offices, changing areas, courts and grounds
- coaching, competitions, tournaments, team matches, junior activities and social events
- working alone, opening or closing the premises, evening and weekend shifts
- away fixtures, business travel, training, meetings and external events
- work-related communications, including email, telephone, messaging groups, video calls and social media
- staff accommodation or transport, if ever arranged by the Club.

This employment policy is separate from, but should operate alongside, the Club's member code of conduct, safeguarding procedures, grievance procedure and disciplinary procedure. Conduct by a member or visitor may be addressed through the Club's membership or complaints processes as well as protective workplace measures.

3. Responsibilities

The Management Committee has overall responsibility for this policy and for ensuring that appropriate preventative measures, reporting routes and review arrangements are in place.

The Chair, Club Manager and anyone with line-management or supervisory responsibility must:

- lead by example and promote respectful behaviour
- identify and assess risks in the areas and activities they oversee
- act promptly when they witness or receive a report of unacceptable behaviour
- avoid promising absolute confidentiality and share information only where necessary
- ensure that nobody is disadvantaged for raising or supporting a genuine concern
- seek independent or specialist support where a conflict of interest or serious allegation requires it.

Everyone covered by this policy is expected to treat others with dignity and respect, follow this policy, complete required training, raise concerns where appropriate and cooperate with investigations.

4. Equality, diversity and inclusion

Employment and volunteering decisions will be based on relevant skills, experience, conduct, performance, safeguarding suitability and the operational needs of the Club, and will not be influenced by unlawful discrimination.

The Equality Act 2010 protects people from discrimination because of nine protected characteristics:

- age

- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race, including colour, nationality and ethnic or national origin
- religion or belief
- sex
- sexual orientation.

The Club will consider and make reasonable adjustments for disabled employees, workers, volunteers and applicants where required. Anyone who may need an adjustment should speak to the Club Manager, Chair or another nominated committee member.

5. Discrimination

5.1 Direct discrimination

Direct discrimination occurs when someone is treated less favourably because of a protected characteristic. It can include discrimination because of association with another person or because someone is perceived to have a protected characteristic.

5.2 Indirect discrimination

Indirect discrimination can occur when a policy, rule, requirement or way of working applies to everyone but puts people sharing a protected characteristic at a particular disadvantage. A requirement may be lawful where it can be objectively justified as a proportionate means of achieving a legitimate aim.

5.3 Disability, pregnancy and maternity

The Club will not treat someone unfavourably because of something arising from disability unless objectively justified and will make reasonable adjustments where required. Employees and applicants must not be treated unfavourably because of pregnancy or maternity.

6. Bullying

Bullying is unwanted behaviour that is offensive, intimidating, malicious or insulting, or an abuse or misuse of power that undermines, humiliates or causes physical or emotional harm. It may be repeated behaviour or a single serious incident and can occur face to face or through written or digital communication.

Examples may include:

- insulting, intimidating or humiliating someone
- deliberately excluding or isolating someone
- spreading malicious rumours
- repeatedly undermining or unfairly criticising someone
- abusing a position of authority, influence, coaching responsibility or committee status
- deliberately setting someone up to fail
- inappropriate, aggressive or threatening communications.

Reasonable and legitimate management action, delivered fairly and respectfully, is not bullying. This includes giving constructive feedback, setting reasonable standards, allocating work, managing conduct or performance and applying Club procedures.

7. Harassment

Harassment is unwanted conduct related to a relevant protected characteristic that has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.

Examples may include offensive comments or jokes; insults or ridicule; unwanted remarks about personal characteristics; displaying or sharing offensive material; unwanted gestures or physical behaviour; deliberate exclusion; and inappropriate conduct through messaging or social media.

Harassment can affect someone even when it is directed at another person. A single serious incident can be harassment. Behaviour described as jokes, humour or "banter" can still breach this policy, whether offence was intended or not.

8. Sexual harassment

Sexual harassment is unwanted conduct of a sexual nature that has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment.

Examples may include:

- unwanted sexual comments, jokes, innuendo or propositions
- suggestive looks, staring, leering or sexual gestures
- intrusive questions or comments about someone's body, relationships or private life
- displaying, sending or sharing sexual or suggestive images or messages
- sexual comments or contact through social media or messaging groups
- spreading sexual rumours
- unwanted touching, hugging, kissing or other physical contact
- offering or implying work, shifts, opportunities, coaching or other advantages in return for sexual attention.

Conduct previously welcomed can become unwanted. Consent to earlier behaviour does not mean similar behaviour will always be welcome. It is also unlawful to treat someone less favourably because they rejected or submitted to sexual harassment or certain harassment related to sex or gender reassignment.

Sexual harassment may constitute serious or gross misconduct and may result in disciplinary action up to and including dismissal. For non-employees, the Club may restrict access, end an engagement, suspend or terminate membership, or take other action under the relevant agreement or Club rules, following a fair process.

9. Third-party harassment

Club personnel regularly interact with members, guests, parents, spectators, visiting players and teams, suppliers, delivery drivers, entertainers and members of the public. Nobody is expected to tolerate harassment because it comes from a customer, member or other third party.

The Club will assess and reduce foreseeable risks, particularly in bar and catering operations, evening events, alcohol-related activities, lone working, changing areas, junior activities and circumstances where staff may feel unable to challenge a member or customer.

Depending on the circumstances, protective action may include warning the individual, refusing service, asking them to leave, arranging support or safe transport, changing contact arrangements, increasing supervision or staffing, restricting access, suspending or ending membership or a commercial relationship, and contacting the police where appropriate.

10. Victimisation

The Club will not tolerate victimisation of anyone who raises a genuine concern, supports another person, provides information or evidence, or participates in a complaint or investigation. Victimisation may include exclusion, unfair treatment, denied opportunities, reduced shifts, negative comments, threats or other disadvantage connected with the concern.

Protection does not apply to allegations or information knowingly made false or given in bad faith. A concern is not malicious merely because it is not upheld or the evidence is inconclusive.

11. Prevention, risk assessment and training

The Club will take proactive, risk-based steps rather than relying on complaints after an incident.

Measures will include, where reasonable and appropriate:

- a harassment and sexual-harassment risk assessment covering bar, catering, events, coaching, junior activities, changing areas, late-night work, lone working, digital communications and third-party contact
- clear standards communicated to employees, volunteers, members, guests, contractors and event organisers
- induction and regular refresher training, with additional training for managers, supervisors, committee members and complaint handlers
- safe staffing, escalation and closing arrangements for evening and alcohol-related events
- accessible reporting routes that do not require a concern to be raised with the person complained about
- recording incidents, actions, training and the reasons for decisions about preventative measures
- reviewing relevant contracts, event terms, booking conditions, member communications and signage
- prompt review after an incident, near miss, complaint, operational change or identification of a new risk.

12. Raising a concern

A person does not need to be certain that conduct meets a legal definition before raising a concern.

Concerns may be reported verbally or in writing to any of the following:

- the Club Manager
- the Chair
- another Management Committee member whom the person feels comfortable approaching
- a nominated safeguarding or welfare contact, where the concern overlaps with safeguarding.

If the concern is about the Club Manager, it should be raised with the Chair or another committee member. If it concerns the Chair, it should be raised with the Welfare Officer or another committee member. The Club should appoint an independent investigator or adviser where necessary to manage conflicts of interest.

Where safe and appropriate, a concern may be addressed informally. Nobody will be required to confront the person concerned. Serious, repeated or disputed allegations, or cases involving a material risk to others, will normally require formal consideration even if an informal response is requested.

Anyone facing an immediate threat should move to a safe place, seek help from the duty manager or another responsible person and contact emergency services where needed.

13. Formal complaints and investigations

Formal complaints by employees will normally be considered under the Club's grievance procedure. Alleged misconduct by an employee will be considered under the disciplinary procedure. Complaints

involving volunteers, coaches, contractors, members or visitors will be handled under the applicable agreement, safeguarding process, complaints procedure, membership rules or code of conduct.

Investigations will be impartial and proportionate. The person complained about will be told the substance of the allegation and given a fair opportunity to respond. Relevant evidence may include witness accounts, rotas, messages, emails, booking records, incident reports and lawfully held CCTV.

Interim measures may be used to protect people or preserve the integrity of an investigation. They are precautionary and do not indicate that a conclusion has been reached. The Club will seek to avoid placing an unnecessary burden on the person who raised the concern.

Some conduct may be a criminal offence or safeguarding matter. The Club may support a report to the police or relevant authorities and may need to make a referral where required to protect a child, adult at risk or others.

14. Confidentiality, records and support

Concerns will be handled sensitively and information shared only where appropriate and necessary to understand the concern, investigate, take action, provide support or meet legal obligations. Absolute confidentiality cannot be guaranteed because allegations may need to be put to the person concerned and relevant witnesses.

Everyone involved must respect privacy and avoid unnecessary discussion. This does not prevent anyone seeking appropriate support or advice, exercising legal rights, reporting a potential criminal offence or making a protected disclosure.

The Club will maintain appropriate records of concerns, investigations, decisions, actions, training and policy reviews in line with its data-protection and retention arrangements. Reasonable support and temporary changes to duties, shifts, contact or working arrangements will be considered where appropriate.

15. False or malicious complaints

No action will be taken against someone simply because a genuine complaint is not upheld or there is insufficient evidence. Deliberately making an allegation known to be false, or knowingly providing materially false or misleading information, may be addressed under the relevant disciplinary or conduct process.

16. Contacts and escalation

Role	Contact	When to use
Club Manager	Kerry Hill (events@stscsport.co.uk)	Day-to-day concerns and immediate operational support
Chair	Laura Payne (chair@stscsport.co.uk)	Escalation, concerns about the Club Manager or serious allegations
Secretary	Spencer Adaway (desk@stscsport.co.uk)	Concerns involving the Chair or where another route is preferred
Welfare Officer	Shade Alu (welfare@stscsport.co.uk)	Concerns involving children, adults at risk or wider welfare issues

Emergency services	999 in an emergency; 101 for non-emergency police contact	Immediate danger or potential criminal conduct
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17. Review and related documents

The Management Committee will review this policy at least annually and sooner following a serious incident, material complaint, significant operational change or relevant legal or regulatory development.

This policy should be read with the Club's other policies.