

Diversity, Equity & Inclusion Policy

2025 – 2026

Centre Name	Saracens Foundation
Approved/Reviewed by	Benjamin Lawrence
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1. Introduction

This policy is supported fully by the Board of Saracens Group and a copy of this policy is published on the club website. The Board will review this policy at intervals of no more than three years (or as necessary due to changes in legislation). The Chief Operating Officer is responsible for the day-to-day implementation of this policy.

2. Purpose of the Diversity, Equity & Inclusion (ED&I) Policy

The purpose of the Diversity, Equity & Inclusion policy is to:

- ensure all staff, workers, volunteers, supporters, contractors and suppliers know what is required of them regarding DE&I;
- enable staff, workers, and volunteers to raise concerns without fear of retribution;
- reduce the risk of discrimination by clarifying commitments, expectations and responsibilities absolutely.

3. Policy Statement

Saracens Group recognises that providing equality of opportunity, valuing diversity and promoting a culture of inclusion are vital to our success both on and off the pitch.

Saracens abhors all forms of unlawful and unfair discrimination. We are a family who support each other and respect each other's beliefs. We aim to create an

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environment which values individuals equally and where people can be free to be themselves.

Saracens does not disadvantage individuals by discriminating on any grounds including, but not limited to, age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex (gender) and sexual orientation.

This policy seeks to ensure those involved with Saracens are inclusive. Most importantly it underpins our belief that we are all different, want different things, react differently to the same situation and possess different strengths. As such we need to be treated as individuals with respect and without assumption.

We are committed to challenging discrimination in all its forms and will support our leaders, managers, players, supporters, partners, staff and the wider Saracens family in demonstrating this commitment in their everyday activities.

4. Policy Commitment

Saracens values of Work Rate, Honesty, Discipline and Humility unite our organisation and define how we behave and how we interact with each other, and they guide how we make decisions.

Saracens is dedicated to encouraging a supportive and inclusive culture across all levels of the club through the promotion of diversity and inclusion and ensuring the elimination of discrimination in the workplace and across all strands of our organisation.

There will be no discrimination in our recruitment, selection, promotion, transfer, training & development, discipline and dismissal processes, nor when considering pay and benefits, terms & conditions and/or flexible working arrangements. All decisions in these areas will be based on individual circumstance, aptitude and ability or merit as appropriate to the area.

We will have a zero-tolerance approach to discrimination, harassment, and bullying, such as gaslighting and mobbing. As such we will not tolerate any form of these across the Saracens Group and those organisations that carry the Saracens brand; from any employee, player, volunteer/worker, supporter, external partner, contractor, people who use our service and/or facilities or Board member and will impose sanctions on those that breach this policy. (See Annex A for detailed areas of law)

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We aim to create a working environment in which individual differences and the contributions of all team members are recognised and valued and the environment promotes dignity and respect.

Saracens Group is committed to the Rugby Against Racism campaign and commits to making English professional club rugby and the professional sport and entertainment sector a more diverse, welcoming and inclusive environment for our staff, players, fans and clients while also supporting societal change.

We take any breaches of this policy seriously and would encourage anyone who feels they have been subject to discrimination, harassment or bullying to raise their concerns without any fear so we can act to sanction and eradicate such behaviour.

Our aim is to also influence the sectors and communities we work in through demonstrating our commitment and consistent practice in these areas and working with other likeminded organisations on the furtherance of DE&I.

5. Responsibilities

All members of the Saracens community are expected to behave in accordance with this policy and treat each other with dignity and respect at all times. This includes both through interactions in person and through all types of communication, both personal and public (e.g. social media).

Employees and Volunteers/Workers

- All employees and volunteers/workers have a responsibility to comply with and promote the policy through appropriate actions and behaviour.
- All employees and volunteers/workers must value and respect each other's individuality and ensure they do not participate in any behaviour that would breach this policy, whether intentionally or unintentionally.
- All employees and volunteers/workers should challenge unacceptable language and behaviour and report any breaches of the policy to their line manager, the People Team (sangitaasani@saracens.net) or Safeguarding Lead (safeguarding@saracens.net).
- Line managers must ensure those working for them are aware of and understand the policy and the importance of appropriate behaviour and language.
- Line managers must appropriately challenge and deal with any incidents that breach the policy and ensure all issues are reported to senior management to enable appropriate processes to be instigated.
- All employees and volunteers/workers must undertake any training required.
- Any breach will result in disciplinary procedures being instigated.

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Players

- Players will perform, both on and off the pitch, within the commitments made within this policy.
- Any breach will result in internal club disciplinary procedures being instigated.

Members and Supporters

- Supporters are expected to behave in line with the policy (which is reflected within the Saracens Supporters Charter) when attending Saracens' ground/premises and when supporting Saracens at any away games or any other official events at which Saracens are involved.
- Supporters witnessing any behaviour contrary to this policy within Saracens' ground/premises or when supporting Saracens at any away games or any other official events at which Saracens are involved should immediately report it to a Saracens Pioneer, Saracens member of staff or the Saracens Safeguarding Lead (safeguarding@saracens.net).
- Any supporter found breaching this policy may be banned from Saracens' ground/premises for a period of time and up to a lifetime ban for serious breaches.

External Partners/Sponsors/Contractors

- All external partners, sponsors and contractors will be expected to comply with this policy when attending Saracens' ground/premises, when supporting Saracens at any away games or any other official events at which Saracens are involved or carrying out work affiliated with their name.
- The evaluation process used to identify whom Saracens should work/partner with may be influenced by the extent to which organisation's operate and commit to discrimination legislation and philosophy. This would also be the case for continuing relationships.
- Failure to meet the standards of legislation and/or this policy may lead to the dissolution of any partnership or agreement.

People Who Use Saracens Services and/or Facilities

- Anyone using services or facilities provided both at Saracens' ground/premise or in their name at external venues, must comply with this policy. Individuals arranging events, use and/or access to Saracens' facilities must ensure that those involved are all fully aware of this policy.
- Any person found breaching this policy may be banned from Saracens' ground/premises for a period of time and up to a lifetime ban for serious breaches.

The Board

- The Board will ensure current and robust policies and practices are in place to achieve Saracens' commitment to Diversity, Equity & Inclusion.
- The Board will lead on the policy through its commitment and example.
- Any Board member failing to live up to the commitment of the policy will be subject to internal procedures.

6. Work & Influence in the Community

Saracens is committed to use its brand, networks and resources to make a positive impact within the communities that the club operates, particularly supporting people who are disadvantaged or marginalised within society.

The Saracens Foundation is the Group's charitable arm and has a vision to transform lives on and off the pitch to build stronger communities.

The charity works collaboratively to enhance the education, employability and health of our communities, to build a stronger and more inclusive society for all.

The Foundation has an extensive and diverse reach providing programmes for individuals with disabilities, over 50s, girls and women, those from low-income families, those from ethnic minority backgrounds, those in the probation service and numerous programmes that support pupils and teachers within the school system. Much of the Foundation's work reflects a strong ethos of inclusion and a commitment to create greater equality of opportunity amongst the diverse communities in which Saracens operates.

The Saracens Multi-Academy Trust was set up by Saracens to further the educational aspirations and attainment of one of the most disadvantaged and challenging communities in North London, Colindale in the London Borough of Barnet.

The first school of the Trust, Saracens High School opened in 2018 and is situated within the Grahame Park Estate in Colindale, a low socio-economic area with high levels of ethnic diversity. Subsequently, the Trust has now added the first Primary School, Bell Lane to the MAT.

The vision at Saracens High School is to spark a flame of inspiration in each and every pupil, whatever their interest or ambition, and to support them to become the person they want to be.

7. Monitoring

We will monitor the make-up of our workforce regarding information such as age, sex (gender), ethnic background, sexual orientation, religion or belief and disability to encourage diversity, equity and inclusion and support meeting our aims and commitments within this policy.

All information will be requested on a voluntary basis and only used for the purposes of developing and monitoring DE&I plans.

8. Annex A

The Law

The Equality Act 2010 consolidated, harmonised and expanded on existing discrimination law covering the areas of:

- Equal Pay
- Sex Discrimination
- Racial Discrimination
- Disability Discrimination
- Human Rights
- Sexual Orientation
- Religion or Belief
- Age Discrimination

The Equality Act defines the group of people protected from direct and indirect discrimination as those possessing 'protected characteristics'. When participating in recruitment, selection, transfer, promotion, training, or dismissal it must be ensured that objective criteria, fairness, reasonableness, and openness are appropriately applied to all the groups defined as possessing protected characteristics:

Protected characteristics

These are:

- age
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race
- religion or belief
- sex
- sexual orientation

Types of discrimination - The Equality Act 2010 defines direct discrimination, indirect discrimination, victimisation, and harassment.

Direct discrimination: Discrimination occurs if an employer discriminates against an employee because of a protected characteristic, or treats them less favourably, whether or not the employee possesses that characteristic (except in the case of marital status or civil partnership). It is unlawful to discriminate against employees because of their connection with someone else who possesses a protected characteristic, or because they are mistakenly perceived to possess a protected characteristic. This is called discrimination by association or perception.

Indirect discrimination: Unjustified indirect discrimination is unlawful in relation to most protected characteristics. The Equality Act extended coverage to include gender re-assignment and disability (but not to pregnancy and maternity). Indirect discrimination can occur when a condition, rule, policy or practice is applied to everyone, but particularly disadvantages people who share protected characteristics. Indirect discrimination can in certain circumstances be justified for proportionate means of achieving legitimate business aims, however this must be achieved fairly and with due consideration to protected groups, and alternatives to this business need must be considered carefully first.

Harassment: Harassment is unwanted conduct related to a relevant protected characteristic which has the *purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual*. Harassment applies to all protected characteristics except for pregnancy and maternity and marriage and civil partnerships. Employees can complain of any behaviour that they find offensive even if it is not directed at them, and the complainant need not possess the relevant characteristic themselves. Employees are also protected from harassment because of perception and association (as laid out under Direct Discrimination). Further, sexual harassment may amount to both an employment rights matter and a criminal matter, such as in sexual assault allegations. In addition, harassment under the Protection from Harassment Act 1997 – which is not limited to circumstances where harassment relates to a protected characteristic – is a criminal offence.

Third Party Harassment: Employers can be held liable for the harassment of their employees by a third party (for example, someone outside their organisation). The Act extended liability for third-party harassment to all protected characteristics (other than pregnancy/maternity and marriage/civil partnerships) where the employer has failed to take reasonable steps to prevent it, and provided the

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employer knows that the employee has experienced third-party harassment on at least two prior occasions.

Victimisation: Victimisation occurs when an employee is treated less favourably because they have made or supported a complaint in good faith or raised a grievance under the terms of the Equality Act or because they are suspected of doing so. (See also Bullying and Harassment,

SG DE&I Policy Reviewed: March 2025 Report a concern: Sangita Asani People Business Partner & Safeguarding Lead, E: safeguarding@saracens.net and sangitaasani@saracens.net

Confidentiality and Whistle-blowers Policy). Victimisation can also occur when someone feels they are being discriminated against because of a protected characteristic they hold.

Detriment arising from disability: This occurs when employers treat employees in a detrimental way because of something that is a consequence of their disability. A typical example would be dismissing employees with poor attendance records when their absences were caused by disability. This would be unlawful unless dismissal could be justified as a “proportionate means of achieving a legitimate aim” or the employer could not reasonably have been expected to know of the disability. People with disabilities who are recruited, or who become disabled during employment must be assessed and provided with reasonable adjustments for the employee to carry out their day-to-day duties. If in doubt about this process, please contact Human Resources.

Other elements of the Equality Act 2010:

Employment Health Questionnaires: Employers must not ask health related questions before an applicant has been offered the job or been successful at interview. Up to this point, health related questions can only be asked for the reason of finding out what reasonable adjustments that person might need during the recruitment process or deciding whether the applicant can carry out an essential requirement of the job. Employers can however ask about disability for the purpose of providing diversity monitoring or to take positive action. Once a person has been successful at interview, then an Employment Health Questionnaire may be sent to them.

Instructions/Pressure to Discriminate: It is unlawful for a person who has authority over another person to instruct that person to act unlawfully within the Acts. That no unlawful act may occur as a consequence of the person’s action does not matter, it was the original instruction or pressure that is unlawful. It should be noted

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however, that the liable person will not necessarily only be the one giving instructions/pressure, as carrying out the act is also deemed unlawful.

9. Useful Resources

- RFU Diversity & Inclusion Toolkits

<https://www.englandrugby.com/governance/diversity-and-inclusion/resources>

Name: Benjamin Lawrence

Signature: 

Date: 01/07/2025

Role: Head of Operations – Saracens Foundation

I _____ can confirm that I have read and understood the policy and will adhere to the necessary reporting requirements of this policy in light of any incidents that I am aware of.

Name _____

Date _____

Signature _____