

ST ATHAN COMMUNITY COUNCIL EQUALITY & DIVERSITY POLICY



Adoption

Adopted by St Athan Community Council at the Full General Council meeting held on Tuesday 7th July 2026 and replaces the previous Equality & Diversity Policy, 1st Edition dated 1st October 2021. Version: 2.0.

Minute reference: 3504
Review date: May 2027

Signed:
Name:
Chair of St Athan Community Council

1. Introduction

1.1 St Athan Community Council is committed to equality, diversity, inclusion, dignity and respect in its employment practices, decision-making, services, meetings and engagement with the community.

1.2 The Council will not unlawfully discriminate against, harass or victimise any person. It will seek to ensure that no employee, councillor, volunteer, contractor, service user, resident, visitor or member of the public receives less favourable treatment because of a protected characteristic or any other irrelevant factor.

1.3 The Council values the diversity of the local community and recognises that different people may have different needs. The Council will aim to remove barriers to participation, employment and access to Council services where it is reasonable and proportionate to do so.

1.4 This policy should be read alongside the Council's Code of Conduct, Complaints Policy, Disciplinary & Grievance Policy, Local Resolution Protocol and Data Protection Policy and Welsh Language Policy.

2. Scope

2.1 This policy applies to:

- all councillors when acting in their Council role;
- all employees, workers, volunteers and anyone acting on behalf of the Council;
- job applicants and candidates for appointment;
- contractors, suppliers and partner organisations where they deliver work or services for the Council;
- members of the public, service users, hirers, event attendees and community participants.

2.2 This policy covers employment, recruitment, training, service delivery, procurement, events, meetings, communications, community engagement, access to Council facilities and the handling of complaints or concerns.

2.3 This policy does not replace statutory employment procedures, the councillor Code of Conduct process, safeguarding procedures, criminal reporting duties or any other formal procedure that must be followed in law.

3. Legal and good practice framework

3.1 This policy is intended to support the Council's compliance with, and good practice under, the following legal and guidance framework:

- Equality Act 2010;
- Equality Act 2010, section 149 - Public Sector Equality Duty, where the Council is exercising public functions;
- Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011, as good-practice guidance where proportionate and applicable;
- Human Rights Act 1998;
- Data Protection Act 2018 and UK GDPR, where equality monitoring or sensitive personal data is handled;
- Rehabilitation of Offenders Act 1974, where criminal record information is relevant to employment or volunteering decisions;
- Welsh Language (Wales) Measure 2011 and Welsh Government statutory guidance for community and town councils;
- relevant guidance from the Equality and Human Rights Commission, Welsh Government and ACAS.

3.2 The Council will apply this policy in a practical and proportionate way, taking account of its size, staffing structure, resources, functions and local community needs.

4. Protected characteristics and other relevant considerations

4.1 The Equality Act 2010 protects people from discrimination because of the following protected characteristics:

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

4.2 The Council will also seek to avoid unfair treatment connected with caring responsibilities, socio-economic disadvantage, language, rural isolation, digital exclusion, part-time or flexible working status, trade union activity, and past offending where it is not relevant to the role or risk being considered.

4.3 The Council recognises that people may experience disadvantage or barriers because of more than one characteristic or circumstance. Where appropriate, the Council will consider the combined impact of decisions and practices.

5. Public Sector Equality Duty and decision-making

5.1 When exercising public functions, the Council will have due regard, where relevant, to the need to:

- eliminate unlawful discrimination, harassment, victimisation and other conduct prohibited by the Equality Act 2010;
- advance equality of opportunity between people who share a protected characteristic and people who do not;
- foster good relations between people who share a protected characteristic and people who do not.

5.2 Due regard means consciously considering equality at the point a decision is being developed and made. Equality considerations should not be treated as a box-ticking exercise or left until after a decision has been taken.

5.3 For significant decisions, policies, projects, events, service changes or budget proposals, officers and councillors should consider whether an equality impact or equality consideration note is needed. The checklist at Appendix 1 may be used for this purpose.

5.4 Equality considerations should be recorded in a proportionate way, for example in a report, risk assessment, project file, event plan, consultation record or minutes.

6. Council commitments

6.1 As an employer

The Council is committed to:

- creating a working environment where individual differences are respected and valued;
- ensuring employees, workers and volunteers are treated fairly and with dignity;
- making employment decisions based on merit, capability, conduct, performance, legal requirements and service needs;
- providing reasonable adjustments for disabled employees and candidates where required;
- taking allegations of discrimination, harassment, bullying or victimisation seriously;
- reviewing employment policies and practices to ensure fairness and consistency.

6.2 As a service provider and community body

The Council is committed to:

- providing services, facilities, meetings and events in a way that is fair, respectful and accessible wherever reasonably practicable;
- considering the diverse needs of residents and service users when planning services and events;
- encouraging participation from people and groups who may face barriers to involvement;
- using inclusive language and accessible communication wherever practicable;
- ensuring contractors and partners understand the Council's expectations on equality and respectful conduct;
- learning from complaints, feedback and community engagement.

7. Employment, recruitment and working arrangements

7.1 Recruitment and selection will be carried out fairly, consistently and transparently. Job descriptions, person specifications and selection criteria should be relevant to the role and should not include unnecessary requirements that may disadvantage applicants.

7.2 Selection for employment, training, development, promotion or other work-related opportunities will be based on aptitude, ability, performance, conduct and the requirements of the role.

7.3 The Council will consider reasonable adjustments for disabled applicants and employees. Requests should be considered promptly, sensitively and on their own facts.

7.4 Employment records, equality monitoring data and health information will be kept confidential and processed in line with the Council's data protection arrangements.

7.5 Criminal convictions or cautions will only be considered where relevant to the role, legal requirements, safeguarding, risk, insurance or trust and confidence. The Council will not unfairly exclude applicants or employees because of an offending background where it is not relevant.

7.6 Flexible working, caring responsibilities and work-life balance requests will be considered in accordance with employment law, operational needs and Council policy.

8. Service delivery, meetings and community engagement

8.1 The Council will aim to make its services, meetings, events and communications accessible and inclusive. This may include considering:

- venue accessibility, including step-free access, seating, lighting, acoustics and accessible toilets where available;
- timing and location of meetings or events;
- hybrid or remote access arrangements where lawful, practical and proportionate;
- plain English, alternative formats, large print or digital copies where reasonable;
- language needs, including Welsh Language Policy;
- community groups that may be less likely to engage or attend;
- safeguarding, dignity and respectful behaviour at public events.

8.2 The Council will seek to ensure that public participation arrangements are fair and that members of the public are treated with dignity and respect, subject to lawful meeting procedure and reasonable rules of conduct.

8.3 Where the Council consults or engages on a significant matter, it should consider whether the engagement method is likely to reach a fair cross-section of affected people and whether additional steps are needed to remove barriers.

9. Welsh language

9.1 The Council has adopted a separate Welsh Language Policy / Polisi Iaith Gymraeg, adopted by Full Council on 3rd February 2026, Minute Ref. 3358, with review due in February 2027.

9.2 This Equality & Diversity Policy should be read alongside the Welsh Language Policy. In equality and inclusion terms, the Council recognises the importance of the Welsh language and the principle that Welsh should be treated no less favourably than English.

9.3 The Council's practical arrangements for Welsh language visibility, bilingual notices, website information, social media, public information and correspondence are set out in the Welsh Language Policy. Those arrangements will be applied in a practical and proportionate way, taking account of the Council's resources and operational capacity.

9.4 Where a matter overlaps with Welsh language arrangements, the Welsh Language Policy should guide the Council's operational approach. This policy continues to apply to equality, inclusion, access, dignity and fair treatment considerations.

10. Accessibility and reasonable adjustments

10.1 The Council will take reasonable steps to avoid placing disabled people at a substantial disadvantage when accessing employment, services, meetings, events or information.

10.2 Reasonable adjustments may include changes to working arrangements, meeting arrangements, information formats, equipment, communication methods or physical arrangements, depending on the circumstances.

10.3 Requests for adjustments should be considered promptly and sensitively. The Council may need to ask for further information to understand the barrier and identify a practical solution.

10.4 The Council will aim to ensure that new documents, notices and website content are as accessible as reasonably practicable, including by using clear headings, readable formats and plain language.

11. Conduct, harassment, bullying and victimisation

11.1 The Council will not tolerate unlawful discrimination, harassment, bullying or victimisation by councillors, employees, volunteers, contractors or others acting on its behalf.

11.2 Harassment may include unwanted conduct related to a protected characteristic that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment.

11.3 Victimisation means treating someone badly because they have made, supported or may make a complaint or allegation of discrimination, or because they have helped someone else to do so.

11.4 Councillors are expected to comply with the Members' Code of Conduct. Employees are expected to comply with their contract, job requirements, Council policies and lawful management instructions.

11.5 Low-level councillor/officer conduct issues, misunderstandings or minor interpersonal disputes may be considered under the Council's Local Resolution Protocol where appropriate. Serious matters, employment grievances, safeguarding issues, criminal allegations, public service complaints and formal Code of Conduct complaints must be dealt with through the correct procedure.

12. Complaints, concerns and breaches

12.1 A person who believes they have been treated unfairly, discriminated against, harassed, bullied or victimised should raise the matter using the appropriate procedure.

12.2 The usual routes are:

Type of concern	Likely route
Employee concern about employment, treatment at work or working conditions	Disciplinary & Grievance Policy
Concern about Council service, communication, service failure or public interaction	Complaints Policy
Low-level councillor/officer misunderstanding or minor conduct issue	Local Resolution Protocol, where appropriate
Alleged breach of the Members' Code of Conduct by a councillor	Members' Code of Conduct process / Public Services Ombudsman for Wales, where the threshold is met
Safeguarding or criminal concern	Immediate referral to the appropriate statutory body or emergency service

12.3 Breaches of this policy by an employee may be dealt with under the Council's Disciplinary Policy. Breaches by a councillor may be considered under the Members' Code of Conduct or other relevant Council procedure.

12.4 The Council will not victimise anyone for raising a genuine equality concern, making a complaint, assisting an investigation or requesting a reasonable adjustment.

13. Monitoring, training and review

13.1 The Proper Officer will keep this policy under review and may recommend updates where legislation, statutory guidance, Council structure or operational needs change.

13.2 Councillors and employees should receive appropriate equality awareness training or briefing, proportionate to their role and the Council's resources.

13.3 The Council may monitor equality issues arising from complaints, grievances, recruitment, employment practices, service feedback, events and community engagement. Any personal data collected for this purpose must be processed lawfully, fairly and securely.

13.4 The Council will review this policy at least every three years, or sooner if required.

Appendix 1 - Equality consideration checklist

This checklist may be used for reports, new policies, projects, events, service changes, procurement decisions, budget proposals or other significant Council decisions.

Question	Consideration	Notes / action required
1	What decision, policy, project, event or service is being considered?	
2	Who may be affected, including employees, councillors, residents, service users, hirers, visitors, volunteers or contractors?	
3	Could the matter affect people differently because of age, disability, gender reassignment, marriage/civil partnership, pregnancy/maternity, race, religion/belief, sex or sexual orientation?	
4	Are there potential barriers to access, participation, communication, safety or dignity?	
5	Are reasonable adjustments or alternative arrangements needed?	
6	Has the Council considered Welsh language implications and whether Welsh should be supported or offered?	
7	Has relevant feedback, evidence or consultation been considered?	
8	What steps will reduce disadvantage, improve access or foster good relations?	
9	Does the proposal involve collecting equality or health information, and if so how will data protection requirements be met?	
10	How will the decision and equality considerations be recorded?	

Appendix 2 - Reference documents

- Equality Act 2010.
- Equality Act 2010, section 149 - Public Sector Equality Duty.
- Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011.
- Welsh Language (Wales) Measure 2011.
- Welsh Government: Public Sector Equality Duty guidance.
- Welsh Government: Statutory Guidance for Community and Town Councils.
- Equality and Human Rights Commission guidance on equality and the Public Sector Equality Duty.
- ACAS guidance on equality, discrimination, discipline and grievances at work.
- St Athan Community Council Code of Conduct.
- St Athan Community Council Complaints Policy.
- St Athan Community Council Disciplinary & Grievance Policy.
- St Athan Community Council Local Resolution Protocol.
- St Athan Community Council Data Protection Policy.
- St Athan Community Council Welsh Language Policy.