

# Equality and Diversity Policy

## Document control

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<b>Author:</b>	Jayne Wass –quality director
<b>Owner:</b>	Jayne Wass –quality director
<b>Summary:</b>	This policy establishes clear guidance regarding equality and diversity matters and to sets out the principles, structures and monitoring arrangements for the apprenticeship college.

## Authorisation

<b>Signature:</b>	<i>Graham D Howe</i>	<b>Title</b>	<i>Managing Director</i>	<i>8<sup>th</sup> October 2021</i>
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## Related Documents

- Safer recruitment and selection processes. (PO1)
- Preventing extremism and radicalisation policy (P23)
- Safeguarding policy and procedure (P19)
- Whistleblowing policy (P11)
- Prevention of bullying and harassment policy (P10)
- Safeguarding and prevent support for further CPD
- Guidelines for visitors
- Standards of business conduct (P03)
- Behaviour policy (P40)
- GDPR / data protection policy (P20)
- Online safety protocols (P33)
- Delivering remotely policy (P34)
- Remote working policy (P29)
- Inclusive language policy (P28)

## Legislation and further reading

Equality Act 2010

## Purpose

The purpose of the policy is to establish clear guidance regarding equality and diversity matters and to establish the principles, structures and monitoring arrangements for the apprenticeship college.

We are committed to advancing equality of opportunity for all. The Apprenticeship College celebrates and values the diversity brought by individuals and is committed to meeting the needs of a diverse learner population within a multi-cultural society. The Apprenticeship College seeks to ensure that individuals and communities have equal access to learning programmes and facilities, to be responsive to the changing demographic of the local area, and to play an active role in community cohesion.

We will treat all employees, workers and learners with respect and dignity, and seeks to provide a working environment free from discrimination, harassment or victimisation. The Apprenticeship College will seek to eliminate discrimination on grounds of age, class, disability, employment status, ethnic origin, gender, marital status, pregnancy and maternity, nationality, religion, sexual orientation, gender reassignment or special needs.

We aim to create a working and learning environment where there are positive relations between different groups of people. To this end, The Apprenticeship College undertakes to provide training and support for staff, to consult with staff about their experience of the working environment, and to provide diverse images in any material that it produces. The aim is to create an inclusive ethos where issues of racism, bullying, stereotyping and discrimination can be discussed openly, where there is a shared commitment to challenging and preventing all kinds of discrimination, and where there is respect for diversity and difference.

The policy upholds the values of the Equality Act 2010 which provides a single overriding legal framework to replace all equality laws. We commit to ensuring that all people are treated equally in respect of:

- Age
- Disability
- Gender reassignment
- Marriage/civil partnerships
- Pregnancy and maternity
- Race
- Religion and belief
- Sex
- Sexual orientation

## Scope

This policy and related procedures apply to all staff, learners, and other users of the apprenticeship college. This single equality scheme covers all issues relating to equality, diversity and inclusion in The Apprenticeship College. This policy seeks to

comply with the requirements of the Equality Act 2010 and best practice.

Our commitment to equality, diversity and inclusion will be highlighted in our brochures, annual self-assessment report, annual equality information report, and annual financial statement. It will be published on The Apprenticeship College website and the staff breath dashboard.

We will seek to ensure that:

- Senior leaders, staff, learners and employers are aware of our single equality scheme and the action needed for its implementation.
- Staff, learners and employers are aware of the value placed upon equality of opportunity and that action will be taken in the event of any breach of this scheme.
- Senior leaders and staff have access to comprehensive information, which assists them to plan, implement and monitor actions to carry out their responsibilities under this scheme.

Monitoring of this policy will be the responsibility of the quality director in conjunction with the equality and diversity committee who will report to the executive team at least annually. Managers will be responsible for the local monitoring and implementation of the policy and procedures. Other monitoring mechanisms include:

- Self-assessment process
- Learner, employer, and staff surveys
- Data analysis
- Monitoring of complaints and compliments
- Quality assurance and improvement
- Observation of teaching and learning

## **Duty identification and Responsibilities**

### Protected Characteristics

The following characteristics are the protected characteristics defined by the Equality Act 2010 (in alphabetical order):

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity • Race
- Religion and belief
- Sex

- Sexual orientation

### General and specific duties

Under current equality legislation The Apprenticeship College has a general duty to have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation
- Advance equality of opportunity between people who share a protected characteristic and those who do not
- Foster good relations between people who share a protected characteristic and those who do not
- Remove or minimise disadvantages suffered by people due to their protected characteristics
- Take steps to meet the needs of people from protected groups where these are different from the needs of other people

### Meeting the specific duties

In order to meet the specific duties described above we will:

- Produce annual equality objectives and an action plan which identify actions that need to be taken for The Apprenticeship College to meet its general and specific duties
- Where necessary, assess the impact of its policies on learners and staff across the nine protected characteristics
- Monitor the admission and progress of learners and the recruitment and career progress of staff by ethnicity, disability, gender, age, faith and sexual orientation
- Set out arrangements for publishing the results of assessments and monitoring
- Publish annually the results of assessments and monitoring by EDI measures

### Other types of discrimination

The Apprenticeship College has a responsibility to address other types of discrimination that are not direct. These include:

- Indirect discrimination – this can occur if a rule or policy disadvantages a particular protected characteristic.
- Associative discrimination – this is discrimination against an individual because he/she associates with another person who possesses a protected characteristic.
- Discrimination by perception – this is discrimination against a person because others

think he/she possess a protected characteristic.

- Harassment – College employees are entitled to complain of behaviour they find offensive even if it is not directed at them.
- Harassment by a third party – The Apprenticeship College is potentially liable for harassment of their staff or learners by people not employed by The Apprenticeship College. e.g., harassment of a learner on work experience.

## **Roles and Responsibilities**

### **The Senior Leadership Team**

It is the responsibility of the SLT to ensure that The Apprenticeship College meets its legal obligations with respect to the general and specific duties. SLT members are responsible for ensuring that:

- The Apprenticeship College strategic plan includes a commitment to equality
- Equality training is mandatory for all staff
- They are aware of the SLT's statutory responsibilities in relation to equality legislation as an employer and service provider
- They receive and respond to the EDI monitoring information on learners and staff

### **Management**

Managers are responsible for putting policies into practice. They are responsible for implementing the single equality scheme. They must ensure they are aware of The Apprenticeship College's statutory duties in relation to legislation:

- All aspects of The Apprenticeship College policy and activity are sensitive to the issues faced by different protected characteristics
- Group monitoring information is collected and analysed
- Targets are set on the recruitment, retention and achievement of learners based upon the analysis of the EDI monitoring information
- Teaching observation reports include criteria on equality issues where appropriate
- Curriculum areas are required to assess performance in relation to protected characteristics as part of the programme review and self-assessment process, and to take action as appropriate
- The procedures for staff recruitment and career development enshrine best practice in equal opportunities Staff All staff have responsibilities for promoting equality and fostering good relations between different groups.

All staff have responsibilities to eliminate discrimination on grounds of race, gender, disability or any of the protected characteristics. Staff are responsible for ensuring that:

- They are aware of The Apprenticeship College's statutory duties in relation to legislation
- Their schemes of work, lesson content and teaching resources demonstrate sensitivity to issues of equality • They challenge inappropriate behaviour by either learners, work placement providers or other members of staff
- It is the responsibility of The Apprenticeship College and each of its individual members of staff to confront discrimination, whether witting or unwitting, whenever it occurs

### Learners

Learners as key stakeholders also have a role and responsibility to comply with policies:

- apprentices should be made aware of The Apprenticeship College ethos and policies at induction, through publicity and events, and through the embedding of EDI in teaching and learning.
- learners should make every effort to understand and support The Apprenticeship College's single equality scheme. They should treat all other learners, staff, and visitors with respect and dignity.
- learners must show respect for other people's cultural traditions and religious beliefs and participate in initiatives designed to promote good relations.
- learners should report any incidents of discrimination, harassment, or bullying using The Apprenticeship College's anti-bullying and harassment and complaints procedures.

### Marketing

The Apprenticeship College will ensure that all publicity materials present appropriate images that reflect our diversity and send out positive messages about different groups of people.

### Positive action

The Apprenticeship College undertakes, once the results of monitoring are available, to consider targets to reduce any disadvantage suffered by employees and learners due to any protected characteristic. If monitoring reveals that specific groups are especially disadvantaged, some targets may relate to those specific groups.

Positive action strategies are intended to be temporary measures only. They will be kept under regular review as they cannot be used once the special needs have been met or if the under-representation no longer exists. The Apprenticeship College will ensure that when using positive action as a strategy, it falls within the law.

### How the scheme is implemented

The Apprenticeship College will seek to ensure that all policies and procedures (e.g., recruitment and selection procedures for staff and apprentices) are non-discriminatory, and that the monitoring and positive action processes are regularly reviewed and monitored.

## Action plan

Equality and diversity objectives and an action plan will be produced annually. This should highlight The Apprenticeship College's progress in meeting its general and specific duties. Production of the action plan is the responsibility of the Quality Director. The SLT will regularly review progress on the action plan.

## Training

All staff must complete Equality and Diversity training on joining The Apprenticeship College. Additional bespoke equality training is organised or made available to staff at all levels within The Apprenticeship College. All staff involved in recruitment and selection attend recruitment and selection courses.

## Assessing the impact of the equality policy

The Apprenticeship College has a duty to assess the effect of the equality policy on staff and apprentices with different protected characteristics. It will do this by setting and monitoring equality and diversity targets. Each curriculum area is required to comment on equality and diversity issues within their area in the annual Self - Assessment Report. Each area must include at least one Equality and Diversity target within their Quality Improvement Plan. Progress on these targets is monitored throughout the year at Performance Reviews. The Apprenticeship College will also monitor a wide variety of data according to race, gender, and other protected characteristics.

## Impact assessment and monitoring

### Learners

The Apprenticeship College has a duty to monitor the admission and progression of learners. To inform the setting of targets and to assess the effect of the equality policy, The Apprenticeship College will collect and analyse the following information by ethnicity, gender, age, ability, and where applicable, sexual orientation and faith:

- Group profiles of learners
- Applications, and success and failure rates for admission to programmes
- Retention rates
- Achievement rates
- Work placements including success rates, satisfaction levels and job offers
- Disciplinary action
- learner satisfaction feedback
- Complaints by learners or their sponsors

### Staff

The Apprenticeship College has a duty to monitor the recruitment and career development of staff. To inform the setting of targets and to assess the effect of the

equality policy, The Apprenticeship College will collect and analyse the following information by ethnicity, gender, age, disability, sexual orientation and faith:

- Group profiles of employees by grade/salary scales and type of work
- Job application rates
- Selection success rates
- Type of contract (permanent, temporary)
- Training/Staff development
- Career progression, application and success rates
- Disciplinary/capability proceedings
- Grievances
- Exit surveys

### **Publishing the results**

Equality data will be published and will be reviewed regularly by The Equality and Diversity Committee. A summary of the results of our monitoring information will be included in our annual self-assessment report, annual equality information report and annual financial statements, where this does not breach individual confidentiality.

### **Compliance**

#### **Dealing with complaints**

The Apprenticeship College will seek to provide a supportive environment for those who make claims of discrimination or harassment. Acts of discrimination (direct or indirect), harassment, victimisation or abuse will be treated as serious disciplinary offences.

#### **Sanctions**

**Learners** - Any discriminatory behaviour by learners, including that directed against staff, will be dealt with under the disciplinary procedure. Any learner who suffers discrimination, or who is aware of it happening to someone else, should report it to one of the following: their Coach, the Skills Coach Manager or the Quality Manger. Disciplinary action can then be taken against those responsible. Incidents will be investigated according to The Apprenticeship College's anti-bullying and harassment or complaints and compliments procedures.

**Staff** - Staff who feel they are being discriminated against by other members of staff should raise the matter under the grievance procedure or anti-bullying and harassment procedure, which may, if the accusation is upheld, lead to the use of the staff disciplinary procedure.