



Equality, Diversity and Inclusion [EDI] Policy and Procedure 2026-27

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Purpose

As a leading provider of education and training and a holder of public and private funds, NiNe Training Limited have a duty to ensure that everyone has equal and fair access to its services and that cultural diversity is celebrated.

NiNe goes beyond compliance with equality law and aspires to be the champion of best practice in all aspects of equality, diversity, and inclusion [EDI]. NiNe aim to create an inclusive environment where all can learn, work and reach their full potential in an environment free from bullying, harassment and discrimination.

This policy and procedure are set in the context of the company mission statement and is firmly embedded in the core business values. It supports the company's aim of actively promoting and maintaining a positive ethos and image that represents NiNe's commitment to EDI.

The purpose of this policy and procedure is to outline the organisations approach to fulfilling its commitments and make it clear to all involved what they can expect from NiNe.

Scope

This policy and procedure relate to employment practices and education and training both within the organisation and within the client groups it supports, applying to all learners and staff engaged in funded and commercially delivered programmes. This policy and procedure cannot be viewed in isolation and must be read in conjunction with the following policies:

- NINE Complaints Policy and Procedure
- NINE Continuous Professional Development Policy
- NINE Health and Safety Policy and Procedure
- NINE Prevent Policy and Procedure
- NINE Safeguarding Policy and Procedure
- NINE Safer Recruitment Policy
- NINE Teaching, Learning and Assessment Policy
- NINE Access Arrangements & Special Considerations Policy
- NINE Appeals Policy
- NINE Welsh Language and Culture Policy
- NINE Whistleblowing Policy and Procedure

NiNe will comply with all reasonable requirements from the Welsh Government, Estyn and other regulatory bodies.



Impact on the Learner

The implementation of this policy and procedure will support the creation of a safe learning environment, where learners are treated fairly and with respect. This will ensure that all learners, no matter their background, values or beliefs are able to learn effectively, achieving their full learning potential.

Definitions

Equality is about creating a fairer society where everyone can participate and has the same opportunity to fulfil their potential. It is about everyone's right to live in a society free from discrimination and harassment.

Diversity is about respecting, valuing, and celebrating aspects that make each individual unique. It is about recognising the contribution individuals make to society because of these different aspects, not despite them.

Inclusion means that all people, regardless of their abilities, disabilities, or health care needs, have the right to be respected and appreciated as valuable members of their communities. NiNe recognises that disability includes visible and non-visible disabilities, neurodivergence, mental health conditions and long-term health conditions. NiNe is committed to creating an inclusive environment where individuals are supported appropriately and without stigma.

Legal and Regulatory Framework

NiNe is fully aware of its obligations within the following legal framework, covered by the Equality Act 2010 and its predecessor legislation, and is committed to meeting its legal requirements. The Act, and this policy and procedure, identify nine protected characteristics:

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

The Act defines the following types of illegality, and this policy recognises these:

- **Direct discrimination** is when someone is treated unfairly or less favourably than another individual because they have a protected characteristic.
- **Indirect discrimination** relates to the application of processes, policies or procedures that intends to treat everyone equally but disadvantages individuals from a protected group.
- **Perception discrimination** is direct discrimination against an individual because they associate with



a person who has, or is perceived to have, a protected characteristic.

- **Associative discrimination** occurs when someone is treated less favourably than another individual because they associate with a person who possesses a protected characteristic.
- **Intersectional disadvantage** may occur where individuals experience discrimination or barriers linked to a combination of protected characteristics.
- **Harassment** happens when someone who behaves in such a way that their conduct creates an environment that is hostile, degrading, humiliating, or intimidating.
- **Third party harassment** occurs when someone is harassed by an individual not directly linked to them such as a client or customer.
- **Victimisation** happens when someone experiences disadvantage because they have either directly made a complaint or allegation of discrimination or supported someone else with this process.
- **Discrimination arising from a disability** occurs when someone is treated less favourably due to their disability, where such treatment cannot be justified.

NiNe is dedicated in supporting the new **Additional Learner Needs and Educational Tribunal (Wales) Act 2018**, whilst it is not mandatory in WBL, NiNe where possible have fully embraced the Act and will implement working with external agencies, such as local authorities, governing bodies, referral units from school as and when it is a requirement (ALN Policy).

NiNe will ensure compliance with the requirements of any future equality legislation.

Strategic Aims

NiNe is committed to promoting equal opportunities and celebrating cultural diversity and inclusion across all aspects of the business. NiNe will ensure policies, procedures and processes do not, directly, or indirectly, discriminate against individuals or groups with protected characteristics.

NiNe recognise the under-representation of minority groups within its learner population and are committed to addressing this through working with learners, employers and other stakeholders to remove potential barriers and to actively promote learning opportunities to these minority groups.

NiNe are committed to:

- Eliminating discrimination, harassment, and victimisation
- Advancing equality of opportunity between those who share a relevant protected characteristic and those who don't.
- Fostering good relations between those who share a relevant protected characteristic and those who don't.
- Create conditions which contribute to the full development and potential of all its members.
- Create an environment which promotes EDI of opportunity in education and employment and actively celebrates diversity.
- Create a climate where employees and learners are empowered to have the confidence to challenge acts and behaviour which contravene NiNe's EDI policy and the law.
- Respect equally all employees, learners, and users of its services.
- NiNe is committed to fostering a culture where individuals feel safe, respected and supported regardless of gender identity, health conditions or wellbeing needs.
- Judge fairly and appropriately each applicant for a job vacancy, promotion, or training course.



- Make reasonable adjustments to ensure equality of opportunity.
- NiNe will seek to ensure that learning materials, communications and digital systems are accessible and inclusive wherever reasonably practicable.
- Promote teaching and learning styles and resources which fully encompass the concepts of EDI.

NiNe support the following aims:

To raise awareness of EDI issues, actively promoting the ethos of EDI to staff, learners and employers to tackle discriminatory practices in the workplace by:

- Ensuring all staff are fully aware of their responsibilities through clear emphasis within job descriptions, employee handbooks, effective staff induction and annual update training in EDI.
- Establishing an inclusivity group to champion EDI.
- Providing information, via Learner and Employer Handbooks and induction materials, embedding EDI matters within all areas of teaching, learning and assessment as appropriate.
- Ensuring all strategies, policies and procedures promote inclusion and do not place any disadvantage on those from the protected characteristic groups.
- Actively tackling discrimination and supporting others to do so where appropriate.

To increase participation and achievement of under-represented minority groups within the learning sector areas delivered by:

- Tackling under-representation through promotion of available courses to young people, adults, those from minority and disadvantaged groups and those from rural areas.
- Regularly attending Careers and school open days to promote courses to young people, including those from minority or disadvantaged groups.
- Developing progression routes for unemployed and young learners which positively address under-representation in subject sectors.
- Developing relationships with 'link workers', charities and third sector organisations to widen participation of minority groups.
- Developing a range of promotional case studies for displaying at centres
- Using promotional materials which reflect and reinforce the diversity of society and where appropriate counter stereotypes.
- Ensuring the early identification of potential barriers to learning and providing support in order to succeed in learning.
- EDI principles are embedded into assessment practice through assessment planning, feedback, access arrangements and IQA sampling of learner evidence held in SharePoint.
- Liaising with learners and employers to develop action plans to address any negative trends identified.

To ensure parity of achievement for all groups of learners through:

- Frequent monitoring of appropriate Key Performance Indicators (KPIs) to measure participation and achievement rates of learners from specified groups including ethnicity and minority groups, age, gender, Welsh speaking, and those with additional learning needs.



- More detailed evaluation of achievement and participation trends which are externally benchmarked.
- Annual and periodic evaluation of sub-contractor participation and achievement by age, ethnicity, minority and disability group through the NiNe contract management review
- Effective evaluation of Learner Voice Wales results by key demographics.
- Evaluation of performance trends as part of the self-assessment process with actions incorporated within the Quality Development Plan.

Prevent Duties

NiNe recognise the importance of implementing its duties to the Prevent agenda, whilst ensuring that these actions do not have a negative impact on any learners or members of staff based on one or more of the protected characteristics. Staff are trained to apply Prevent duties proportionately and without bias or profiling.

Risk assessments in relation to these duties will be reviewed to ensure the avoidance of any negative impact on protected groups as far as possible. Further information is available in the NiNe Safeguarding and Prevent policies and procedures.

Responsibilities

The following outlines the requirements of NiNe; however they may be adapted to suit individual organisational structures without diluting the overarching responsibility.

Directors:

- Ensuring NiNe fully meets its legal requirements.
- Ensuring the policy and procedure and associated action plan, meets the requirements of relevant legislation.
- Ensuring effective implementation and monitoring of strategy and action plan.
- Ensuring the strategy is continuously reviewed and that all employees receive adequate training.

Directors/Head of Operations:

- Providing a consistently high-profile lead on all issues contained within the policy and procedure.
- Ensuring all aims and objectives of the policy and procedure are effectively implemented.
- Ensuring all employees are fully aware of their individual and collective responsibilities.
- Providing appropriate training and development activities to ensure employees have the skills and knowledge to support this policy and procedure.
- Setting and monitoring of targets associated with widening participation.
- Ensuring that appropriate action is taken against anyone found to be in breach of the content of this policy and procedure.
- Proactively communicating commitment to this policy and procedure to learners, employers, employees, and external stakeholders.
- Ensuring their team members are made aware of their responsibilities and are provided with appropriate training and support.



- Acting against any discriminatory practices.
- Not discriminating unfairly when involved in recruitment, promotion, and performance management of employees.
- Providing services which fully meet the needs of our diverse client group.
- Supporting a respectful and inclusive culture that recognises differing wellbeing needs and gender identities.

Employees:

- Quality team monitor through sampling that assessment decisions are fair, unbiased and inclusive.
- Practically demonstrating the core principles of EDI by treating others with dignity and respect.
- Effectively identifying and challenging discriminatory behaviour and attitudes.
- Actively participating and contributing to creating an inclusive learning environment that values difference.
- Ensuring that EDI is effectively integrated into the professional practice of teaching, research and service delivery.
- Maintaining an awareness of equality legislation by attending employee development programmes.
- Taking equal responsibility in ensuring that we create a learning environment where people are valued and respected.
- Effectively challenging any form of discrimination.
- Expressing opinions constructively with sensitivity and respect.
- Speaking out if they witness or are aware of discrimination, bullying, unfair treatment or harassment.

Learners:

- Taking equal responsibility in ensuring that we create a learning environment where people are valued and respected.
- Effectively challenging any form of discrimination.
- Expressing opinions constructively with sensitivity and respect.
- Speaking out if they witness or are aware of discrimination, bullying, unfair treatment or harassment.

Implementation

Appropriate training and development activities will be provided to ensure employees are equipped with the skills and knowledge to fully implement this policy and procedure. An annual impact assessment will be undertaken to ensure the principles of this EDI policy and procedure is embedded into all processes and procedures.

The principles of this policy apply equally to online learning environments, digital communications and social media interactions associated with NiNe



Communication

This policy and procedure will be made available in hard copy in every location and in an electronic format on NiNe's SharePoint. Training activities will be introduced to ensure all employees are fully conversant with the content of this policy and procedure. Employers and learners will be provided with access to this policy and procedure at the start of the training programme.

This policy is available bilingually on request.

Complaints Procedure

NiNe will not tolerate abuse, prejudice, harassment or bullying and will use the appropriate disciplinary procedures to investigate and address any complaints. All complaints will be taken seriously and dealt with in a timely and sensitive manner, in accordance with the NiNe's Complaints Policy and Procedure.

Monitoring and Review Processes

This policy and procedures will be reviewed on an annual basis, and where there are changes to regulatory requirements, by the Directors/Senior Management Team.

Data and performance targets associated with this policy and procedure will be reviewed by the Directors/Manager within the self-assessment process.