



# Equality, Diversity, & Inclusion Policy

## Introduction

DRL Services Ltd (“DRL”) is committed to creating an inclusive learning and working environment that values and celebrates diversity, ensuring equal opportunities for all who are involved with DRL. We recognise that equality, diversity and inclusion (EDI) are fundamental to everything we do, and we embed these principles across all aspects of our organisation, from recruitment and induction through to the delivery of apprenticeship programmes.

## Scope

This policy applies to all staff, apprentices, contractors, suppliers and other people working on behalf of DRL. It is applicable at all stages of involvement with DRL, including recruitment and selection, promotion, training, and learning and development.

## Definitions

Equality is the notion of treating individuals fairly and with dignity, free from discrimination, ensuring everyone has equitable access to opportunities.

Diversity is about valuing and embracing the differences in people and reaping the benefits of a varied learner and workforce population.

Inclusion is about actively creating environments in which all people feel welcomed, respected and able to participate fully, irrespective of their background, protected characteristics or personal circumstances.

Equal Opportunities means ensuring that all individuals have access to the same opportunities, without unlawful discrimination or unfair disadvantage.

## Legislative Framework

This policy is informed by and complies with the following legislation and statutory guidance:

- Equality Act 2010
- Human Rights Act 1998
- Data Protection Act 2018 and UK General Data Protection Regulation (UK GDPR)
- Counter-Terrorism and Security Act 2015 (Prevent Duty)
- SEND Code of Practice: 0 to 25 years (2015)
- Children and Families Act 2014
- Care Act 2014
- Apprenticeship Funding Rules

## Protected Characteristics

Under the Equality Act 2010, there are nine protected characteristics. DRL will not discriminate against any person on the grounds of any of the following:

- Age
- Disability
- Gender reassignment
- Marriage or civil partnership
- Pregnancy and maternity
- Race (including nationality and ethnicity)
- Religion or philosophical belief
- Sex
- Sexual orientation

This covers direct discrimination, indirect discrimination, harassment, victimisation, discrimination by association, and discrimination by perception.

## **Policy Commitment**

This policy has been developed to prevent and minimise the risk of any discrimination or unfair treatment to apprentices, employees and any other person involved with DRL. We promote positive attitudes, behaviours and values concerning EDI for the health, well-being and benefit of all. Good and best practice will always be encouraged, leading to continuous improvement through embedding EDI into all policies, strategies and procedures.

DRL ensures that all apprentices, employees, potential employees, contractors and any other people working on behalf of DRL:

- are always treated fairly and with respect
- have the right to be free from harassment and bullying
- have an equal chance to contribute and achieve their potential
- have the right to be free from discrimination because they associate with a person who possesses a protected characteristic, or because others perceive them to have one
- are not victimised or subjected to any form of bullying or harassment

DRL seeks to develop a rewarding and fulfilling environment by promoting mutual trust, support and respect; ensuring equality of opportunity; creating an inclusive atmosphere that maximises personal development; and promoting work-life balance.

## **Equality of Opportunity**

DRL is committed to positive action in relation to each protected characteristic:

Religion or Belief: We ensure that employees' and apprentices' religion or beliefs and related observances are respected and accommodated wherever reasonably possible. We respect people's beliefs where the expression of those beliefs does not impinge on the legitimate rights of others.

Gender: We challenge discriminatory assumptions about women and men, take positive action to redress the effects of discrimination, and offer equal access for all to services, employment, training and pay. We provide support to prevent discrimination against transgender and non-binary people.

Sexual Orientation: We ensure that we take account of the needs of LGBTQ+ (lesbian, gay, bisexual, transgender, queer/questioning and other) staff and apprentices, and foster an inclusive environment for all.

Disability: We provide reasonable adjustments to ensure disabled people have access to our services and employment opportunities. We challenge discriminatory assumptions about disabled

people. DRL is a Disability Confident committed employer and will not discriminate due to any physical or mental impairment.

Pregnancy or Maternity: We ensure that people are treated with respect and dignity regardless of pregnancy or maternity. We take account of the individual needs of employees and apprentices and ensure no person is disadvantaged.

Age: We ensure that people of all ages are treated with respect and dignity, with equal access to employment, training, development and promotion opportunities. We challenge discriminatory assumptions about younger and older people.

Race: We challenge racism wherever it occurs, respond swiftly and sensitively to racist incidents, and actively promote race equality.

## **Inclusion and Barriers to Learning**

DRL recognises a wide range of barriers can affect apprentice participation, engagement, well-being and achievement. We are committed to identifying, assessing and reducing these barriers proactively, and to supporting all apprentices to fulfil their potential. DRL establishes a culture in which staff understand the range of barriers apprentices may face, including those specific to the communities and contexts in which we operate.

Common barriers to learning and well-being may include, but are not limited to:

- Special educational needs and/or disabilities (SEND)
- Mental health difficulties or emotional well-being challenges
- Caring responsibilities, including for children or other dependants
- Financial hardship or socioeconomic disadvantage
- Previous negative educational experiences or low prior attainment
- English as an additional language
- Lack of level 2 English and/or mathematics qualifications
- Social isolation, vulnerability or involvement with children's or adult social care
- Work patterns, including shift work, unsociable hours or remote working arrangements
- Bereavement, personal crisis or difficult domestic circumstances

Staff are trained to identify apprentices who may be at risk of disengaging and to respond sensitively and promptly. DRL ensures that high expectations are maintained for all apprentices, including those who face barriers to their learning.

## **Identifying and Assessing Needs**

At the start of each apprenticeship, an initial assessment is conducted to identify each apprentice's learning needs, starting points and any barriers that may affect participation and achievement. This information informs individual learning plans and any support or reasonable adjustments required.

A graduated approach to support is utilised — a continuous cycle of assess, plan, do and review — to ensure apprentices receive an appropriate and proportionate level of support that is regularly reviewed and adapted as their needs emerge or change. This approach is applied by all staff and monitored by leaders to ensure it has a positive impact on apprentices' outcomes and well-being.

DRL will refer apprentices to external specialist organisations where this is appropriate to reduce barriers and promote well-being. DRL ensures that any use of external support is suitable and meets the needs of the individual apprentice.

## **Reasonable Adjustments and SEND Support**

DRL is committed to making reasonable adjustments in accordance with the Equality Act 2010 and the SEND Code of Practice. Reasonable adjustments may include:

- Alternative or modified assessment methods, or additional time allowances
- Adapted learning materials or assistive technology
- Flexible working hours, delivery arrangements or delivery formats
- Changes to delivery location, including remote or home-based delivery
- One-to-one support or specialist intervention
- Anonymous or alternative examination and assessment procedures
- Referral to and collaboration with external specialist organisations

This list is not exhaustive. Requests for reasonable adjustments will be considered on a case-by-case basis, with the particular needs of each individual apprentice taken into account. For apprentices with SEND, DRL ensures accurate and timely identification of needs, maintains high expectations, and ensures staff receive appropriate training and support.

DRL will also support apprentices who experience illness, injury or any other circumstances outside of their control, whether temporary or permanent, providing appropriate arrangements such as pre- or post-assessment access to cover any temporary adjustment. Apprentices with any special considerations will not be given any unfair disadvantage.

## **Recruitment and Admissions**

DRL will ensure that the recruitment and admission of employees and apprentices are conducted in a professional, timely and responsive manner, in compliance with this policy, the Recruitment Policy, and current legislation. All staff involved in the admission of apprentices will be appropriately trained to comply with the requirements of this policy.

Clear and transparent selection criteria will be established for all programmes, providing a framework for fair selection based on merit, qualification, experience and potential. The admissions and referral process will be clear and will not create unnecessary barriers to participation.

DRL will seek the widest possible response from across regional and national communities, promoting access for all, including those for whom education has traditionally not been accessible. All promotional material, including the DRL website, brochures and advertising, will promote people from diverse backgrounds and reflect a diverse apprentice population. Information will be provided in plain English and, where required, in different formats.

## **Caring Responsibilities and Flexible Support**

DRL recognises that apprentices and staff may have caring responsibilities that require flexibility and support. DRL will, where possible, accommodate these needs by considering:

- Flexible learning hours or delivery arrangements
- Work-based commitments (such as shifts) when scheduling off-the-job training
- Support for single parents, young carers and those with dependent care responsibilities
- Access to fair assessment for apprentices who undertake shift work or have caring responsibilities

Time away from learning may sometimes be necessary for urgent family reasons. DRL will handle such situations sensitively and in accordance with individual circumstances and programme requirements.

## **Responsibilities**

The Managing Director has overall responsibility for the implementation of this policy. All managers and Tutors are responsible for its implementation within the learning environment. Every employee and apprentice has an individual responsibility not to practise unlawful discrimination in carrying out their duties or interactions.

All apprentices are responsible for:

- reading and understanding this policy and observing both its content and spirit
- respecting the personal rights, freedom and integrity of fellow apprentices and staff
- recognising that harassment, bullying and discriminatory behaviour are unacceptable and may be disciplinary offences
- reporting any witnessed or experienced incidents of harassment, bullying or discrimination

All staff, and anyone working on behalf of DRL, will be required to demonstrate that they actively promote equality and diversity at all times.

## **Dignity at Work (Bullying and Harassment)**

Harassment and bullying related to protected characteristics, or for any other reason, are unacceptable behaviours that DRL will not tolerate. All staff, contractors, apprentices and other people working on behalf of DRL have the right to be treated with dignity and respect. DRL will not tolerate retaliation against or victimisation of anyone involved in bringing a complaint of harassment or bullying.

Harassment, as defined in the Equality Act 2010, 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. Harassment can be verbal, non-verbal or physical. Bullying is the use of force, threat or coercion to abuse, intimidate or aggressively dominate others, creating a threatening or intimidating environment that undermines the confidence and self-esteem of the recipient.

Acts of discrimination, harassment, bullying or victimisation are disciplinary offences and will be dealt with under DRL's Disciplinary Procedure.

## **Reporting and Complaints**

Any apprentice or staff member who believes that this policy has not been applied correctly should raise this through DRL's complaints procedure. DRL is committed to handling all complaints sensitively, promptly, impartially and confidentially.

Informal Resolution: In the first instance, a complainant may seek to resolve the matter informally by explaining clearly to the perpetrator that their behaviour is unacceptable. Advice may be sought from a line manager or another trusted member of staff. All such discussions will be strictly confidential.

Formal Complaints: In the event that informal resolution is unsuccessful or inappropriate, a formal written complaint should be submitted to the Training Manager. The complaint should include the name of the alleged perpetrator(s), the nature of the issue, the dates and times it occurred, names of any witnesses, and any steps already taken informally. Complaints will be investigated within five working days of receipt, and DRL will write to the complainant to inform them of the outcome and their right to appeal. An annual report of complaints received will be presented at the DRL Management Review.

## Training and Awareness

All parties involved with DRL will receive EDI training as part of their induction and through ongoing development. All staff are expected to actively promote EDI within their delivery and to embed EDI themes within schemes of work and session delivery. Staff will be assessed on the delivery of EDI as part of the teaching and assessment quality review process.

This policy will be communicated to all staff and apprentices via the DRL website, induction process and apprentice handbook, as well as at all DRL delivery sites, ensuring everyone feels welcomed and valued regardless of their background or characteristics.

## Monitoring and Review

DRL will gather and analyse equality data, monitoring participation, achievement and outcomes across different groups of apprentices. An equal opportunities form will be issued to each apprentice at the start of their programme to support equitable monitoring. This data will be used to identify and address any gaps in achievement between groups and to set improvement targets, informing continuous improvement across delivery.

The impact of DRL's inclusion strategies and reasonable adjustments will be continually monitored, and proactive adaptations made where required. All personal data will be handled in accordance with DRL's Data Protection Policy.

Regular evaluations and reviews of this policy will be undertaken to ensure it accurately reflects the practices of DRL Services Ltd and remains compliant with all relevant legislation. This policy will be reviewed annually or sooner if there are significant changes to legislation or regulatory requirements.

<b>Policy Record Details</b>	
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