

# EQUALITY, DIVERSITY & INCLUSION POLICY

Document Owner		The Directors			
Implementation		This policy will be made available to all stakeholders.			
Communication		This policy will be communicated to all staff at induction. Copies of this policy are available electronically via the Policies and Procedures folder on the Everything Apprenticeships SharePoint Site.  Stakeholders may request a PDF version of this policy which will be sent by email.			
VERSION	DETAILS INC. POLICY CHANGES		DATE	APPROVED BY	
1.0	First production		18/03/2024		
1.1	Final version approved		15/04/2024	Kerry Linley	



## 1. POLICY STATEMENT

This document is the Equality, Diversity & Inclusion Policy (the Policy) which sets out our commitment to promoting equality of opportunity, embracing diversity, and eliminating discrimination in all aspects of our operations. The Policy sets out what stakeholders can expect from Everything Apprenticeships (EA) and how it will ensure an environment free of prejudice.

By prioritising equality, diversity, and inclusion, we aim to cultivate an environment where all stakeholders can flourish, regardless of their background, identity, or circumstances.

## 2. KEY TERMS

The following key terms define and clarify the terminology used throughout this Policy and serve to ensure that all readers have a clear understanding of the definitions.

Candidates	Individuals who apply for employment with the company.		
Coach tutor assessor	An individual or group employed by EA to plan, support and monitor apprentices ensuring clear objectives and alignment to the KSBs.		
Directors	The Directors of Rubitek Solutions Limited.		
Employers	Those organisations who employ learners and contract with EA to deliver training.		
Everything Apprenticeships	Everything Apprenticeships (EA) or the Company is a trading name of Rubitek Solutions Limited.		
Facilitator(s)	An individual or group employed by EA to guide and assist learner(s), either individually or in groups, during facilitated training sessions.		
<b>Information, Advice</b> & Guidance Information, Advice & Guidance (IAG) is the provision of essert information, advice, and guidance regarding training (e.g. apprenticeship training) and career development.			
Learner(s)	An individual or group including apprentices who attend facilitated learning sessions delivered by facilitators / coach tutor assessors.		
Senior Management	Individuals responsible for shaping the organisational culture, driving innovation and ensuring effective leadership at all levels.		
Staff	Employees and any external consultants employed in any capacity by EA.		
Stakeholders	Individuals and groups of individuals who are detailed in this Policy.		



## 3. OBJECTIVES

EA is dedicated to fostering an inclusive and equitable environment where diversity is celebrated, and all individuals are treated with care, dignity, and respect. Through the implementation of this policy, we aim to:

- **Promote diversity and inclusion** across all aspects of our organisation, including recruitment, training, and workplace culture. By embracing diverse perspectives, experiences, and backgrounds, we aim to create a vibrant and inclusive community where everyone feels valued and supported.
- **Prevent discrimination, harassment, and prejudice** within our organisation. We will provide training, resources, and support mechanisms to educate staff, learners and stakeholders about their rights and responsibilities and to address any instances of discrimination or harassment promptly and effectively.
- **Ensure equal opportunities** for all individuals regardless of their age, gender, race, ethnicity, disability, sexual orientation, religion, or socio-economic background. This includes implementing fair and transparent recruitment processes, providing reasonable accommodations, and fostering a supportive and inclusive learning environment for all apprentices.
- **Embed inclusive practices** into all aspects of our operations, from curriculum development and delivery to staff training and decision-making processes. This involves actively seeking input from diverse perspectives, valuing different viewpoints, and incorporating inclusive language and imagery in our communications and materials.
- **Promote awareness and understanding** of diversity and inclusion issues among staff, learners and other stakeholders through training, workshops, and educational initiatives.
- Monitor and evaluate our progress towards achieving our equality, diversity and
  inclusion objectives using feedback, data, and benchmarking to inform our efforts. This
  includes conducting regular diversity audits, surveys, and reviews to identify areas for
  improvement and ensure ongoing accountability and transparency.
- **Comply with legislation** including all UK laws relevant to equality, diversity, and inclusion, maintaining high standards of practice in line with current legislation and best practices.

This Policy aims to ensure that equality, diversity, and inclusion are prioritised and embedded into all aspects of our organisation, fostering a culture of respect, dignity and belonging for all our stakeholders.

#### 4. SCOPE

This Policy applies to all aspects of our operations, including recruitment, training, workplace culture, and interactions with stakeholders. It applies to activities taking place on our premises and at other locations where staff, learners, facilitators / coach tutor assessors, and other stakeholders may be working and learning. Its scope encompasses the promotion of diversity and inclusion, prevention of discrimination and harassment, provision of equal opportunities, and embedding of inclusive practices within the organisation. Additionally, the Policy covers efforts to promote awareness and understanding of diversity and inclusion issues and to monitor and evaluate progress towards achieving equality, diversity, and inclusion objectives.



## 5. RESPONSIBILITIES

**The Company** recognises the benefits of having a diverse community, with individuals who value one another, and the different contributions everyone can make. Staff must demonstrate that they value and respect colleagues. The Company is committed to be an equal opportunities employer and is committed to equality of opportunity for all staff.

**The Directors** are responsible for maintaining the Policy and ensuring that relevant organisational arrangements and resources are available to support its implementation and effectiveness. This includes overseeing the periodic review and update of the Policy to reflect changes in legislation, regulations, industry standards, and organisational needs. The Directors are accountable for fostering a culture of equality, diversity, and inclusion, promoting, and supporting initiatives that cultivate a respectful, fair, and inclusive work environment.

Other Stakeholders' Responsibilities:

- **Senior Management** is responsible for providing leadership in promoting equality, diversity, and inclusion, ensuring that policies are developed and implemented with supporting procedures that promote equality, diversity, and inclusion and provide guidance and support to staff. They must also monitor and report on progress towards diversity and inclusion objectives.
- Facilitators / coach tutor assessors and staff must actively uphold the principles of equality, diversity, and inclusion in their interactions with colleagues, learners, employers, and other stakeholders, fostering an inclusive culture and challenging discrimination or bias whenever it is encountered.
- Learners, employers, and other stakeholders are encouraged to actively participate in initiatives that promote equality, diversity, and inclusion within the organisation, providing feedback and suggestions for improvement where necessary.

## 6. **DEFINITIONS**

The Equality Act 2010 brings together previous legislation to protect people from discrimination in the workplace and in wider society. The act covers nine 'protected characteristics' which qualify for protection from discrimination under the act. These are as follows:

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



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The 2010 Act also extends some of these protections to characteristics that previously were not covered by equality legislation. There are several different types of discrimination under this legislation. These are:

**Direct discrimination** (including direct discrimination by association and direct discrimination by perception) occurs when a person is treated less favourably than another person because of a Protected Characteristic. For example, rejecting an applicant of one race because it is considered they would not "fit in" with others because of their race. This would be a decision based on grounds of their race and would be direct discrimination. Direct discrimination also occurs when a person is treated less favourably because of their association with another person who has a protected characteristic (other than pregnancy or maternity). For example, if an Employee is harassed or victimised because a colleague who is also a friend is disabled, this would be direct discrimination against that colleague.

**Indirect discrimination** occurs where an individual is subject to an unjustified provision, criterion or practice which is applied to all but puts them at a particular disadvantage because of, for example, their sex or race. For example, a minimum height requirement would be likely to eliminate proportionately more women than men. If these criteria cannot be objectively justified for a reason unconnected with sex, they would be indirectly discriminatory on the grounds of sex.

**Discrimination arising from disability** occurs when a disabled person is treated unfavourably because of something connected with their disability and the treatment cannot be shown to be a proportionate means of achieving a legitimate aim. For example, where an Employee with cerebral palsy who is told they will be unable to attend a Company meeting or activity because there is no suitable access available and other options are not investigated.

**Harassment** which is behaviour that is deemed offensive by the recipient. Individuals can now complain of the behaviour they find offensive, even if it is not directed at them.

**Victimisation** occurs when someone is treated badly because they have made or supported a complaint or grievance under this legislation.

Other definitions which are relevant to this Policy are:

**Diversity** refers to the presence of a wide range of characteristics, backgrounds, and perspectives among individuals within an organisation. This includes differences in race, ethnicity, gender, age, sexual orientation, disability, socioeconomic status, religion, cultural background, and other attributes that contribute to the richness of the workforce and learner population.

**Inclusion** means fostering a culture that actively welcomes and embraces diversity, ensures equal access to opportunities and resources, and promotes a sense of belonging and empowerment for all learners, staff, and stakeholders.

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The Ofsted definition of **British Values** in education are:

- Democracy
- The rule of law
- Individual liberty
- Mutual respect for and tolerance of those with different faiths and beliefs, and for those without faith

# 7. EQUAL OPPORTUNITIES

All stakeholders have a right to be treated with respect and dignity when dealing with EA and this includes the right to interact, study, learn and work in an environment that promotes physical, emotional, and verbal respect, and that is free from violence, bullying and abusive language.

EA will endeavour to promote equality, diversity, and inclusion best practice in all our activities and by working in partnership with others. We will promote the same to our partners and stakeholders and ensure that our marketing and advertising actively reflects this. We will conduct stakeholder surveys and internal audits annually, and we will use the results to help us review and renew our policies and procedures.

## 8. RECRUITMENT

EA is an equal opportunities and disability confident employer and accepts applications for employment from people irrespective of their sex, gender reassignment, race, disability, sexual orientation, pregnancy and maternity, or religion or belief or special educational needs (SEN) and will not discriminate on these grounds in the terms on which employment is offered. The recruitment process which is carried out in line with our safer recruitment and selection processes, is conducted in such a way as to result in the selection of the most suitable person for the role in terms of relevant experience, abilities, and qualifications. EA will treat every application, including those from prospective apprentices, in a fair, open-minded way.

All job descriptions and vacancy advertisements will be written to ensure that they do not discriminate or exclude any potential candidates due to any protected characteristics and that the vacancy is open to all suitable candidates that meet the criteria for the role. Any decision to recruit will be based solely on the merits of the individual and how they performed during the selection process. Reasonable adjustments that have been requested by candidates who have declared that they have a disability will be considered. This is to ensure that no candidate suffers any disadvantages during the selection process.

There are limited circumstances where an employer may act in a way which is discriminatory, but where it can objectively justify discrimination as 'a proportionate means of achieving a legitimate aim'. This includes stating an 'occupational requirement' when applicants for a job must have a particular protected characteristic under the Equality Act. This is a complex area, and EA is committed to seeking advice in such circumstances.



## 9. INDUCTION AND TRAINING

#### 9.1 FOR STAFF

EA will provide training and resources including a detailed and thorough induction for staff (either at the start of their employment with us, or periodically as required) to increase awareness and understanding of equality and diversity matters. Regular communication and discussion on equality and diversity topics will be encouraged to foster a culture of inclusion and continuous improvement.

All efforts will be made to recognise and be aware of the possibility of bias (for example, on the grounds of sex or race) and stereotypes so that these can be eliminated both in training materials and through our communications.

Staff will receive training to equip them with an understanding of equality, diversity and inclusion, and opportunities for professional development. For any individual who declares a disability, reasonable adjustments will be considered, following advice from a medical professional and/or our Occupational Health advisors. In circumstances where reasonable adjustments are agreed, these will be documented in the Disability Passport.

EA may afford staff with a disability or special educational need, access to additional support or training to meet their needs, for example, special language training for staff whose first language is not English.

EA will not discriminate against staff by subjecting them to any detriment, on the grounds of their sex, gender reassignment, race, disability, sexual orientation, pregnancy and maternity, or religion or belief, or special educational needs.

Staff are encouraged to work freely with and have respect for all colleagues and wider stakeholders, irrespective of their sex, gender reassignment, race, disability, sexual orientation, religion or belief, or pregnancy and maternity or special educational needs, subject to considerations of safety and welfare. Employees are encouraged to question assumptions and stereotypes.

#### 9.2 FOR LEARNERS

Learners are briefed on this policy, including how to raise a related issue, or make a complaint. They will also receive training in equality, diversity, and inclusion during their induction with us and whilst participating in Information, Advice and Guidance (IAG) sessions.

Equality, diversity, and inclusion is discussed and monitored during facilitator led delivery sessions and learner tutorials, and delivery and assessment methods are adapted to suit the needs of learners.

We prepare learners for continued employment or further progression with the aim of producing well-rounded individuals who can contribute to society and who feel welcome to do so.



## 10. ENGAGEMENT WITH EMPLOYERS

Equality, diversity, and inclusion is discussed with a learner's employer during our sign-up process, during our initial assessment of prior learning, and at induction to promote engagement and ensure that appropriate workplace policies and procedures are in place to protect apprentices. We engage with employer groups to identify their needs, benchmark best practice against this policy and practice and ensure continuous improvement in our approach to equality, diversity, and inclusion.

## 11. TEACHING, LEARNING AND ASSESSMENT

All individuals involved in facilitating, teaching, educating, and assessing learners will receive appropriate support and training to ensure that all learners, regardless of their backgrounds, feel empowered and motivated to reach their fullest potential with us. We will encourage learners to gain insight into the lives and experiences of individuals from diverse backgrounds, fostering a more inclusive perspective.

Access to training and development opportunities will be provided without bias based on protected characteristics, and all training and assessment processes will be conducted without discrimination. Additionally, we will accommodate specific learner needs by making reasonable adjustments to facilitate their training and assessment, while offering a wide range of training and assessment methods to suit diverse learning styles.

## 12. SAFEGUARDING AND PREVENT

Safeguarding and Prevent policies and procedures are in place to protect individuals from harm, abuse, maltreatment, neglect, radicalisation, or exploitation. Any stakeholder who becomes aware of a situation involving harassment and bullying because of a Safeguarding and / or Prevent issue must comply with the Safeguarding and Prevent duties outlined in those policies, and alongside this Policy.

#### 13. PROCEDURES

EA Staff will be proactive both in seeking out, and its approach to handling equality, diversity, and inclusion issues, so that we can identify good practice and identify those areas where we have fallen short of our high standards.

## 14.1 COMPLAINTS

All complaints will be taken extremely seriously and may be used as part of Staff review meetings, appraisals, and training. Staff who wish to make a complaint should instead refer to the Grievance Procedure. Further information can be found in the Staff Handbook. All other stakeholders should refer to the Compliments, Complaints and Comments Policy.



15<sup>th</sup> April 2024

#### **14.2 STAFF**

Where a member of staff commits any act of unjustified or unlawful discrimination, or allows discrimination to occur without taking appropriate action, may be subject to EA Disciplinary Procedures.

## 14. PROMOTING THIS POLICY AND GAINING COMMITMENT

We are committed to ensuring that all staff and wider stakeholders fully understand, comply with, and actively engage with our policies. Our board and senior management are dedicated to fostering a culture of policy adherence and continuous improvement across our organisation.

Our induction process ensures that new staff members are introduced to our policies from the outset, providing them with the necessary information and guidance to adhere to our standards. Additionally, our annual appraisal process includes a thorough review of staff implementation of our policies, recognising and celebrating successes while identifying areas for improvement.

EA considers staff and wider stakeholder insights and perspectives when refining and reviewing its policies. This ensures our policies remain relevant, effective, and responsive to the evolving needs of our organisation and stakeholders. In addition, we proactively seek out examples of best practices from exemplar training providers, incorporating learnings and insights to further enhance our policies. By continuously benchmarking against industry standards and embracing innovative approaches, we strive to maintain the highest standards of policy governance and effectiveness.

# 15. APPLICABLE LAWS, REGULATIONS AND OTHER POLICIES

This Policy has been written in line with the following legislation and regulations:

- Equality Act 2010
- Rehabilitation of Offenders Act 1974
- Protection from Harassment Act 1997
- Human Rights Act 1998
- Sex Discrimination (Gender Reassignment) Regulations 1999 Racial and Religious Hatred Act 2006
- Data Protection Act 2018
- Employment Rights Act 1996 (as amended)
- Equality Act 2010 (Amendment) Regulations 2023
- Health and Safety at Work etc. Act 1974
- Public Sector Equality Duty 2011
- Mental Health Act 2007
- Gender Recognition Act 2004
- Maternity and Parental Leave etc. Regulations 1999
- Modern Slavery Act 2015

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and should be read in conjunction with other EA Policy documents.



## 16. APPROVAL AND REVIEW

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The Directors are responsible for ensuring the Company meets its obligations in line with this policy.

This policy shall be reviewed by the Directors and updated where necessary before being approved at least annually to ensure that it (and any subsidiary policies and procedures) remains appropriate considering any relevant changes to the law, organisational policies, or contractual obligations.

This policy is approved by Kerry Linley (Director) on 15<sup>th</sup> April 2024.