

EQUALITY, DIVERSITY AND INCLUSION

POLICY

Aim

The policy aims to ensure that all individuals and groups:

1. Are treated fairly and with respect and dignity in all interactions with them and any form of harassment, bullying, or discrimination is prohibited.

2. Have the right to be free from harassment and bullying of any description.

3. Do not suffer unwanted behaviour, whether based on age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion, or belief, sex and sexual orientation.

4. Have an equal and equity chance to contribute treat individual fairly, sometimes providing additional support to remove barriers and ensure they achieve their potential, irrespective of any defining feature that may give rise to unfair discrimination.

5. Can engage with an organisation that complies fully with the Prevent Duty, and who take active steps to equip staff and learners with an understanding of Radicalisation, Extremism and Fundamental British Values.

6. Inclusion – Will focus on providing access to opportunities and resources for individuals who might otherwise be excluded or marginalized.

7. Celebration of Diversity – Skills Group recognise and value different perspectives, experience and backgrounds of learners and staff.

Scope

The Equality, Diversity and Inclusion Policy set out our aims and how we will meet the legal requirements identified in the Equality Act 2010.

Skills Group will make reasonable adjustments in accordance with the Equality Act 2010 to ensure disabled learners, staff and visitors are not placed at a substantial disadvantage compared with non-disabled individuals. Adjustments may include changes to learning materials, teaching methods, assessment arrangements, physical environments or working practices.

The Equality, Diversity and Inclusion Policy apply to:

- Prospective learners/apprentices and staff (in relation to admissions and recruitment arrangements).

- Current learners/apprentices and staff (including those absent, temporarily excluded, learners on work placements, those in work-based learning and learners studying remotely as relevant)

- Former learners/apprentices and staff (if there is continuing relationship based on them having been a learner or a member of staff at Skills Group i.e. following a reference request).

- Directors

- Visitors, contractors and volunteers (while they are on Skills Group premises or carrying out Skills group business)

- Partners and employers where learners have work placements, are work based learners or study remotely.

- Pre-16 learners where applicable

- Parents and carers

Behaviour outside working time and Skills Group premises may also fall into the scope of the policy i.e. the Skills Group has a duty to act where discriminatory behaviour or harassment by a member of staff outside working hours affects a member of staff or learner either directly or indirectly.

Breaches of the policy may be dealt with via the Skills Group Staff Disciplinary Policy or Learner/Apprentice Disciplinary Policy.

Policy Statement/Promoting the Policy

Skills Group is committed to promoting and advancing equality of opportunity and inclusion for all. We strive to maintain an inclusive, transparent and open culture for all stakeholders. We believe it is everyone's responsibility to implement and promote this policy throughout the organisation and expect all staff and learners to share this commitment.

Our policy is set out to show our commitment to promote and implement Equality, Diversity and Inclusion Policy when training learners. It is an important part of the Mission, Vision, Values and Strategic Plan of Skills Group, but also because, by attracting and retaining the most diverse range of talented people as learners, staff and stakeholders, we will ensure Skills Group's future success. This extends to taking a pro-active approach to seeking opportunities to support Skills Group's Equality, Diversity and Inclusion ethos. Our policy is available to all stakeholders and is published on our website. We ensure that the aims of the Department of Education in ensuring Equality, Diversity and Social Inclusion are contained in all our policies, we do this by thinking about equality when we write any new policy or procedure. All staff and learners receive training and updates in Equality, Diversity and Inclusion throughout their time with Skills Group.

We are totally opposed to Harassment and Bullying of any kind and we will meet our commitment under the Equality Act 2010 to publicly and proactively oppose all forms of discrimination.

Our Equality, Diversity Policy and Inclusion Policy have the widest possible scope to ensure the dignity and human rights of every individual, including staff, learners and their families, employers, work placement providers, sub-contractors, service level agreement holders and members of the public with whom we come into contact.

We will strive to ensure that no person involved or associated with Skills Group and their subsidiaries, receive less favourable treatment on the grounds of; nationality, religion, reverence, racial or ethnic origin, language or culture, disability including limitations to physical access or resources, marital status, responsibility for dependants, age, gender, pregnancy, being a nursing mother, a person on maternity leave, gender identity, gender reassignment ,sex, sexual orientation or preference, ability in literacy or numeracy, technical knowledge or skill, behavioural or learning difficulties, lack of ability or insufficient formal qualifications, being an ex-offender, substance abuse, social isolation and homelessness, unemployment, being a contract worker, asylum-seeking status or for any other identifiable discriminatory cause.

We believe in human rights for all those connected with this organisation and all members of society. No action shall be taken against them by any person connected with Skills Group which would devalue their contribution to society as a whole and to this organisation or lead to a loss of self-respect for them or respect for them from others.

However, we believe in order and social discipline both in society and in the organisation of Work Based Training and Education. We hold that we have the right to request a standard of dress appropriate with circumstance and safety at work and the aims of vocational training programmes.

Equality, Diversity and Inclusion Policy

We will respect any request for confidentiality within the limits of the law. If the request for confidentiality is likely to limit our right to deal with Criminal or Health and Safety matters, then the law will take precedence over an individual's right to privacy. This will apply to all issues including those of disability.

The results of all Initial Assessments for learners and any tests for staff will always be given to them, and always in surroundings, which preserve individual confidentiality. We will abide by the Data Protection Act for all computer and documentary security including sensitive data.

We confirm that we will, if unable to help a person with learning difficulties or disabilities to access their chosen learning programme with us, refer them to other agencies or organisations so that a continuous pathway of help and advice is formed.

We will comply fully with the letter and intention of all laws and directives. We are committed to the fulfilment of all Agreements, Codes of Practice, Regulations and Acts, which may have implications for our role in vocational training. Amongst these are the:

- Equality Act 2010
- Health and Safety at Work Act 1974
- Rehabilitation of Offenders Act 1974
- Public Interest Disclosure Act 1998
- Working Time Regulations 1998
- Human Rights Act 1998
- ACAS code of practice
- SEND Code of Practice
- UK GDPR & Data Protection Act 2018
- SEND Code of Practice (2015, updated 2024 draft to monitor)
- Education and Skills Funding Agency Department of Education funding rules
- Keeping Children Safe in Education (2024)
- Prevent Duty & Counter-Terrorism and Security Act 2015
- Children and Families Act 2014
- Criminal Justice and Public Order Act 1994
- Disability Discrimination Act 2005
- Employment Equality Age Regulations 2006 and Amendment Regulations 2008
- Employment Equality Religion or Belief Regulations 2003 and Amendment Regulations 2004
- Employment Equality Sexual Orientation Regulations 2003 and Amendment Regulations 2007
- Employment Rights Act 1996
- Gender Recognition Act 2004
- Protection from Harassment Act 1997
- Race Relations (Amendment) Act 2000
- Special Educational Needs and Disability Act 2001
- Work and Families Act 2006

The responsibility for compliance and for the positive attitude required to ensure success is laid upon all individuals within the organisation. All external persons connected with Skills Group are encouraged to hold the same responsibility and commitment.

To protect staff and learners alike, there will be procedures to ensure that each person is protected against harassment and bullying at work or during any part of training.

There will be procedures for redress of complaints, and for the re-evaluation of decisions taken by Assessors in accordance with the Appeals Procedure following any complaints from

learners. A complaints file will be kept, regularly reviewed and the causes of complaints analysed to prevent reoccurrence.

Anyone whose personal data is kept by Skills Group will have right of access to it.

Engagement towards the Policy by Staff and Learners

As a part of Skills Group, all staff and learners have a duty to engage, cooperate and comply with any measures set out to improve or sustain the concept of Equality, Diversity and Inclusion.

Bullying and harassment must be reported. It is not allowed or encouraged to bully others by omission to carry out any discriminatory act.

Staff and Learners – Training to Implement Policy

All staff will be given full training in implementing the policy and forms part of their CPD and observation process. This training will be reviewed annually unless changes to legislation occur where staff are informed in a timely fashion.

All staff and learners will receive initial, regular and updating briefings on all appropriate aspects for Equality, Diversity and Inclusion Rights and Responsibilities.

If they are a member of this organisation or a participant in one of our training programmes they have an obligation to act in accordance with the ethos set out in this policy at all times, including time away from work or training.

Recruitment and Delivery of Training when Working with Employees, Learners and Employers

Equality, Diversity and Inclusion Policy will be considered and will influence the recruitment of employers, employees and learners, the delivery of its training and other programmes, and when working with employers, learners and stakeholders. Skills Group has a policy that access to staff contracts and to training programmes is open and fair.

Potential staff and learners are to be told at the beginning of any interview that Skills Group's Equality, Diversity and Inclusion Policy cover it.

They are to be told that if they consider the manner or questioning to be ill-advised or too personal or intrusive they should feel free to comment upon it without fear. Such questions can then be re-worded or avoided by interviewing staff as appropriate.

No person shall be forced to put down any detail in their application, which they are concerned, might lead to an infringement of their human rights unless the declaration is required by the law.

Initial assessment, literacy, numeracy or other determiner of current ability will be carried out so that the results of the tests are kept confidential. These results will always be given to the learner concerned on a one-to-one basis in confidence.

No unnecessary testing is to take place. Staff or learners who can show for educational reasons, or reasons of previous experience or qualification, that they already possess a skill or ability should not be tested for it initially.

Should this ability or skill prove to need refreshment at a later time, and then such a test can take place with the agreement of the staff member or learner.

Equality and Diversity Procedures

Our Equality Procedures are listed below:

- Advice and guidance against harassment and bullying.
- Advice and guidance on making complaints and grievances.
- The right to have a friend, supporter or mentor present during interviews.
- The Assessment Appeals Procedure.
- Access to personal data.
- Advice and guidance on referrals of learners to other agencies and organisations for further help and advice.
- Procedure for staff recruitment, selection, promotion, training, redundancy and retirement or dismissal.
- Procedure for learner recruitment including avoidance of stereotyping.
- Guidance on advice and permissions to staff and learners concerning religious beliefs, including customs, festivals and holy days.
- Advice and guidance on the rehabilitation of ex-offenders.
- Restrictions in the use of the internet – limitations on access to certain websites.
- Advice and guidance on the display of potentially offensive material.
- Advice and guidance on the design and content of training materials and sessions
- Staff and learners' dress code

There will be control of the quality and wording of advertising and publicity.

There will be proper procedures for the recruitment of staff and learners, which meet the requirements for Equality, Diversity and Inclusion.

The facilities used by learners will be subject to regular formal review and necessary improvement.

Learners will be encouraged to discuss their concerns both formally and informally, in private, if requested.

Training notes will be checked to ensure the contents do not offend any group. The use of electronic communication will be monitored to ensure that no offensive material is introduced into the training or working environment and that personal privacy of data is protected.

Management strategies and techniques will be regularly evaluated to ensure fairness of conduct.

The structure of training and its content will be evaluated to ensure that it does not offend or infringe upon any person's rights.

The workplace or work placement contract procedures will be examined periodically to ensure fairness. The wording of Contracts or Service Level Agreements will contain wording, which describes the Equality, Diversity and Inclusion Policy of Skills Group in an easily understandable way to any external organisation.

The wording of contracts for full and part-time staff including temporary and contracted consultants will also contain details of the policy.

A copy of this policy will be set out on the Skills Group Intranet system, The policy will be updated yearly or when changes come into effect in accordance with Equality, Diversity and Inclusion legislation and working group action plans.

The dress code will consider concerns by any person who's religious or ethnic customs require a particular type of dress. Fasting periods and other periodic religious or ethnic requirements including time, location and privacy for prayer will also be considered on a case-by-case basis.

Learners who wish to discuss issues they consider important in connection with diet, religious festivals and celebrations should talk to the Equality, Diversity and Inclusion Co-ordinator.

Harassment and Bullying

Harassment is an unacceptable form of behaviour. All staff and learners can consider themselves fully protected by the anti-harassment and bullying policy at Skills Group, at workplaces or work placements or at any other place where work or training takes place.

The policy applies to staff and learners connected with this organisation. The occurrence of harassment must be reported to Skills Group, without fear or favour, even if there is a separate policy in place at a learners' workplace or work placement, which requires the incident to be reported to a workplace manager or supervisor.

Because learners are in receipt of government funding for their training they are to be separately always protected by Skills Group. Learners are to be politely questioned in confidence on each occasion of formal review and at other appropriate times as to their level of contentment with their workplace or work placement.

Confidential records of discussions concerning these aspects must be recorded and stored separately from the documentation connected with individual training plans.

Staff complaints about harassment will also be treated fully in confidence. Wherever possible, a person not involved with the learner or staff member on a day-to-day basis will investigate possible concerns.

This person will be known as the Confidential Mentor. References to complaints of any kind must be recorded in the Skills Group's Complaints File. However, specific confidential aspects of complaints should be noted and filed in a sealed confidential envelope and deposited within the person's personal file.

In general terms, any unacceptable or unwarranted behaviour, which disrupts the quality of life, or work of an individual is unacceptable to us. Although the examples set out below are not exclusive, they show types of unacceptable conduct, which are completely against our policy:

- Successive or single acts of bullying
- Verbal or physical abuse
- Ill-treatment
- Any offensive or oppressive act
- Any defamatory remark
- Causing a person to avoid or want to avoid any social, work, or training environments through poor behaviour towards them
- Ill-advised comments or harassment about any person's sex, sexual orientation (including lesbian, homosexual, bisexual or transitional sexual status under the Gender Reassignment Regulations), religion or belief (including philosophical belief), race or ethnic origin, disability or age, or marital status
- Any abuse of a position of authority by a staff member over a learner or to another staff member
- Being under the influence of alcohol will be considered to aggravate the offence, and will not constitute an excuse for it

Harassing Aspects of Potentially Offensive Display of Graphic Materials

Our policy is that it cannot be assumed that because one person does not find such material offensive, everyone must put up with it. We will not put anyone in a situation in which they have to request that such items be removed, this includes:

- The display of sexual material on posters or in any other form including graffiti.
- Any written or printed material intended to show that any person is inferior in any way, including any sexual or racist aspect.
- The use of 'playboy' or 'playgirl' style calendars or other potentially offensive magazines or pictures including those of a sexually explicit nature or adult material.
- The use of the internet to research, hold on screen, download, attach to email, send or otherwise interact with any sexual or pornographic image, or to connect to any website containing such material. If you type in a keyword and the under/over 18 sign appears on the screen – select NO and do not choose to reveal any 'adult material'.

Managers and Supervisors of learners at external workplaces or work placements are to be asked directly, without embarrassment, fear or favour to remove potentially offensive items from the workplaces of government funded learners as part of our commitment to Equality, Diversity and Inclusion and Protection from Harassment.

To reiterate, no learner will be put in a position of having to ask that material offensive to him or her be removed.

False Accusations

Skills Group will hold it as an offence against this Equality, Diversity and Inclusion Policy if any person gives a false accusation against another learner or staff member. Accusations of a false nature can be deemed as legally defamatory. All those involved in the investigation of any complaint must keep the matter strictly confidential.

Right to Advice and Counselling

Skills Group will ensure that all persons have a right to advice and legal protection. This will be achieved by either a person appointed by Skills Group giving advice in confidence to any learner or staff member, or by referral to an external specialist source such as a solicitor or counselling agency.

Time off from training or staff work will be given to attend external appointments until such matters are resolved.

Positive Action against Gender Stereotypes

All staff shall make every effort to inform learners of opportunities to break out of stereotypical roles at work.

Vocational Training Providers are permitted by law to be proactive in trying to introduce men and women into areas of work not considered normal activities for a particular sex.

Examples of this would be to encourage more men into hairdressing and care, and more women into engineering and construction.

Stereotyping can occur within working environments too – for example, expecting women always to make the tea or do washing up, or expecting men to always change light bulbs or mend electrical fuses or plugs. Staff are to be aware of these aspects and show an example to learners in how to combat them.

Accreditation for Prior Learning and Time off for Learning

Learner's previous experience and qualifications must be formally considered for the purposes of accreditation of prior learning for our training and awarding body requirements.

Staff will be entitled to training for the needs of their job and for personal development. Staff are to negotiate time off the job for learners to carry out personal study for their programme or for formal training sessions at work, or in the Skills Group centre.

Health and Safety

All staff and learners will be protected from defects in their working environments, which fall below standards set out in the Health and Safety at Work Act.

It is the duty of any staff member or learner to immediately point out unsafe equipment or situations.

In the case of dangerous circumstances, staff and learners are empowered to warn people to keep clear of any area.

First Aiders will be trained and appointed, and an Accident Log will be available.

Learners and staff will be required to practice Fire Evacuation and Assembly at designated points.

The Public Liability Insurance certificate will be displayed and kept current.

Selection for Redundancy or Redeployment to another Post

All direct or indirect discrimination will be avoided during selection processes for any redundancies or for redeployment to other or new posts.

Those expecting or on maternity leave will all be protected according to statute.

Victimisation

No person, staff or learner shall be victimised because of them giving information about any act by a person which contravenes this Equality and Diversity Policy.

Persons making allegations, which are proved to be false, will be dealt with in accordance with the appropriate procedures for dismissal.

Any staff member who bullies or harasses another staff member or learner who they believe has made an accusation against them, whether it be proved or not, shall be liable to dismissal.
All staff will be able to report matters detailed in the Public Interest Disclosure Act 1998 without fear.

Management Responsibility and Vicarious Liability

The Managing Director and all other managers and supervisors accept full responsibility for the discharge of the various laws and Acts of Parliament. They fully understand the implications for them of vicarious liability.

Queries and Concerns

All queries and concerns about Equality, Diversity and Inclusion issues should be referred to your immediate Line Manager.

Suggestions for Improvement

Please feel free to offer suggestions on the improvement of Equality, Diversity and Inclusion Systems and Procedures within this organisation. Talk to your Line Manager or your trainer/assessor.

Please note: This policy is not exhaustive, and it can always be improved. It is periodically updated by us to ensure that new laws are considered.

Document Control

This policy will be reviewed annually or earlier if deemed necessary

Date Last Reviewed: March 2026

Date to be Reviewed: March 2027

Authorised By

Signed



Mark Boulting
Managing Director