



Education & Skill
Funding Agency

EQUALITY & DIVERSITY POLICY

Our Policy

This policy sets out the commitment of Talented Training Ltd, its Governance Group and Senior Management Team to promote equality, Diversity and Inclusion of opportunity and to work to eliminate unlawful and unfair discrimination and harassment in the workplace. We value our employees and recognise the contribution they make to our business, and we are committed to providing equality, diversity and inclusion for all irrespective of:

- Age
- Disability
- Ethnicity
- Gender
- Religion or belief
- Sexual orientation
- Gender reassignment
- Civil partnership or marital status
- Pregnancy or maternity
- Social background or any other personal characteristic

Our equality, diversity and Inclusion framework reflects all aspects of our work, including:

Managers and staff, who at all times should:

- Respect, promote and value difference
- Promote an inclusive and supportive environment for staff
- Treat all people fairly, and with respect and dignity
- Work to eliminate discrimination, harassment and victimisation
- Implement statutory initiatives in support of equality, diversity and inclusion

Sites, facilities and information that as far as is reasonably practicable are:

- Safe and welcoming
- Fit for purpose
- Accessible
- Conducive to working.

A work experience that:

- Is accessible to all who meet the entry requirements
- Provides a flexible, fair and supportive environment

- Ensures that everyone, particularly those with protected characteristics, feel included and free from discrimination, harassment, victimisation, extremism and radicalisation
- Reflects, values and promotes the diversity of our community
- Appropriately supports staff and associates with diverse needs
- Promotes the fundamental British values of democracy, law, liberty and mutual respect and tolerance of those with different backgrounds, faiths and beliefs.

SUPPORTING OUR FRAMEWORK

All staff are expected to support and consistently work to deliver an experience that reflects this policy.

Activities that support this policy include:

- Diverse teaching materials and strategies
- Staff inductions that explicitly reflect this policy
- Communications which use plain English, and reflect the needs of our staff, some of whom come from different linguistic or cultural groups or have a communications-related impairment
- Marketing activities which, where possible, promote equality, diversity and inclusion
- Regular opportunities for feedback from clients to improve our practices

We will work to ensure that all of our employees, as well as those who apply or seek to apply to work with us will be treated fairly and will not be subjected to discrimination on any of these grounds. This includes volunteers, apprentices, trainees, and those on work placement. We will make whatever reasonable adjustments are required to provide disabled people with a fair chance to access employment opportunities.

OUR COMMITMENTS

We will:

- Promote equality of opportunity for all
- Promote a productive and harmonious workplace where there is mutual respect and harassment, and bullying is not tolerated
- Prevent unlawful discrimination, direct and indirect and victimisation
- Comply with our legal obligations
- Take seriously and address any breaches of this policy

RESPONSIBILITIES

Managing Director Marios Chrysostomou has overall responsibility for the implementation of this policy. Each manager is accountable for delivering the equality commitments in their areas of responsibility and all employees are expected to abide by the policy.

To implement this policy, we will:

- Include appropriate equality objectives and responsibilities in each job description
- Provide our employees with the necessary knowledge and skills to help ensure that the workplace is free from discrimination and harassment
- Train all those who are involved in recruitment and selection, whether for vacant posts, promotions or training opportunities
- Regularly review our employment policies and procedures to ensure they do not unlawfully or unfairly discriminate
- Gather equality and information on our workforce and job applicants

- Work to make our workforce more representative through monitoring and where possible, undertake lawful positive action
- Ensure promotional material is inclusive and represents the protected characteristics. Where possible we will use existing employees as role models
- Seek commitments from our suppliers that they are taking steps to promote equality and eliminate discrimination
- Make sure that there are sufficient resources in place to implement this policy effectively

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 Talented Training Ltd'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 apprentices, employers or other members of staff
- It is the responsibility of all staff to confront discrimination, whether witting or unwitting, whenever it occurs

APPRENTICES

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

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

TEACHING, LEARNING & ASSESSMENT

The training and assessment of apprentices / learners will support the equality and diversity policy. To ensure that this happens Talented Training Ltd will ensure that all apprentices / learners, regardless of their background, achieve their potential.

Equality and Diversity will be introduced at key stages during the apprenticeship programme:

1. Induction – During the programme induction we will discuss equality and diversity and the learner's rights during the apprenticeship. We will make sure the employer has an Equality and Diversity policy and that the apprenticeship is aware and is compliant with this.
2. Learning and Assessment visits- At each visit we will ask the learner key questions regarding their wellbeing that will also cover Equality and Diversity. (Questions found in ILP)
3. Programme Reviews- At each programme review will ask questions to test the learner's knowledge on Equality and Diversity (questions found in ILP)
4. Surveys – Learners will be surveyed during the programme and at the end of the programme, these surveys will help us identify any issues.

5. OneFile – e-learning platform is there to support the learner with wellbeing issues including Equality and Diversity.

Talented Training Ltd will:

- ensure publications, marketing and promotional materials, key documents such as handbooks, and staff, employer and learner recruitment procedures endorse and support equality and diversity
- seek to recruit the full diversity of staff, to bring a range of experiences and perspectives to the workforce and to provide a range of role models and ambassadors to our learners
- ensure learner recruitment procedures will be free from bias and proactively promote equality and diversity. Recruitment procedures do not use any identifies regarding the learner. Learners are given opportunities to disclose any information they may feel relevant to the recruitment process such as requesting learner support for mental health reasons, but this is up to the individual. Learners have opportunity to disclose any information at each visit with their tutor and will then need to provide consent for this information to be shared, unless it is a safeguarding risk.
- work with learners to plan the learning programme, materials, methods and resources to consider personal needs and aspirations and equality of opportunity without bias or discrimination. Each learner's programmes are designed to be individual to their needs and information used to support that is only that which has been provided by the learner and is relevant to the programme.
- make participants in the learning process aware that they have a legal and formal duty to play their part in this policy, and positive steps will be taken to ensure no form of unlawful discrimination occurs. This is reviewed with learners and employers at formal reviews.
- ensure that learning takes place in a supportive environment free from discrimination or harassment. Questions are asked around the learner's wellbeing at each visit and responses recorded on their ILP.
- ensure that equality and diversity is built into all aspects of the apprenticeship programme processes.
- Actively promote British values to help:
 - Create 'safe spaces' for dialogue and discussion
 - Provide opportunities to challenge views and bring a 'counter-narrative'
 - Identify and protect students vulnerable to extremist ideologies
 - prepare learners to live and work In Britain's complex multicultural society
- continue to provide training in equality and diversity to learners and staff, so that all learners and staff at Talented Training Ltd have the opportunity to develop their skills and confidence and to deal with equality & diversity issues in a professional manner
- deal with all allegations of safeguarding, discrimination, harassment and victimisation sensitively and investigate fairly and thoroughly.
- treat any form of discrimination, harassment or victimisation carried out by an individual as a matter for possible disciplinary action
- lead by example in our dealings with learners, employers and any other contacts.
- support employers to improve their equality and diversity practices.
- use analysis of data to inform future planning, for example to improve the representation, participation and success of under-represented and under-achieving groups, and to challenge stereotyping.

Learners are responsible for

- treating tutors, other learners and work colleagues with dignity and respect.
- not doing anything that would discriminate or harass others because of their race, gender, disability, age, sexual orientation, religion, personal background or circumstance
- reporting any issues of discrimination, bullying or harassment

Employers are expected to

- abide by this equality and diversity policy.
- have their own equality and diversity policies in place, including those associated policies.

It is the responsibility of all staff, learners, and employers of learners to work together towards combating all forms of discrimination. This includes reporting all incidents of discrimination using Talented Training Ltd's formal reporting procedures.

ADDITIONAL LEARNER SUPPORT

Talented Training Ltd encourage the integration and inclusion of **ALL** learners into the Centre. Learners will be offered individualized programmes of development to support them to achieve their personal learning goals. Talented Training Ltd will make a wide range of training and assessment methods available, and we will provide the necessary reasonable adjustments to facilitate training and assessment.

Learners will be invited to access additional support and we provide a wide range of additional support to meet their individual requirements. We respect the individual's right to confidentiality, so any information provided will be kept private and will not be passed to anyone without the person's explicit consent. If a person has requested additional support, they may also arrange a confidential interview with a member of the safeguarding team.

RECRUITMENT OF EMPLOYEES AND APPRENTICES / LEARNERS

Recruitment and selection decisions will support the equality and diversity policy.

Talented Training Ltd will:

- Adopt a consistent, non-discriminatory approach to advertising. Advertisements will avoid stereotyping or using wording that may discourage particular groups from applying.
- Not confine recruitment to areas or sources which provide only, or mainly applicants of a particular group.
- Make certain that all who apply will receive fair treatment and will be considered solely on their ability to do the job / complete the apprenticeship programme.
- Use interview questioning that will not be of a discriminatory nature.
- Ensure discussions with apprentices / learners during the initial assessment and professional discussion will not be of a discriminatory nature.
- Make selection decisions that are not influenced by any perceived prejudices of others.

TRAINING

Talented Training Ltd staff receive equality and diversity training at induction. All staff must complete

- Equality and Diversity training on joining the company
- Additional bespoke equality training is organised or made available to staff at all levels within Talented Training Ltd.
- All staff involved in recruitment and selection attend recruitment and selection courses.

COMPLAINTS OF DISCRIMINATION

If you believe that you have suffered any form of discrimination, harassment or victimisation you can raise this matter through the grievance procedure, a copy of which is available in the staff handbook. All complaints will be dealt with promptly and in accordance with the agreed procedures.

Anyone who makes a complaint of discrimination must not be victimised. We will make every effort to ensure victimisation does not occur and any complaints will be taken seriously and dealt with promptly.

EQUALITY LEGISLATION

The Equality Act 2010 broadens the protection from the discrimination afforded to employees in the workplace. Talented Training Ltd will consider the policy when recruiting, delivering apprenticeship training and working with employers and apprentices.

Employers should ensure that:

- Equality and Diversity policies cover all protected characteristics and does not refer to out of date law. (Age, Disability, Religion or Belief, Sexual Orientation, Transgender, Ethnicity, Gender, Pregnancy and maternity and Marriage and Civil Partnership)
- Training materials should be up-to-date and include all protected characteristics
- Recruitment and Selection policies, procedures and materials should be up-to-date and cover protected characteristics. Pre-employment health questions should be removed from application forms/packs.
- Have up-to-date Equality and Diversity, Bullying and Harassment and Complaint Policies to ensure third party harassment is something you will not tolerate

Indirect discrimination can now be claimed across all seven protected characteristics (Age, Disability, Religion or Belief, Sexual Orientation, Transgender, Ethnicity, Gender). Not included are Pregnancy and maternity and marriage and civil partnership.

Positive action is now available to be used should there be two job applicants of equal calibre the minority person may be selected for the post. Employers must show evidence of a fair and equal selection process.

PROTECTED CHARACTERISTICS

Age

Where this is referred to, it refers to a person belonging to a particular age (e.g., 32-year-olds) or range of ages (e.g., 18 - 30 year olds).

Disability

A person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.

Gender Reassignment

The process of transitioning from one gender to another.

Marriage and Civil Partnership

Marriage is defined as a 'union between a man and a woman'. Same-sex couples can have their relationships legally recognised as 'civil partnerships'. Civil partners must be treated the same as married couples on a wide range of legal matters.

Pregnancy and Maternity

Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth and is linked to maternity leave in the employment context. In the non-work context, protection

against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

Race

Refers to the protected characteristic of Race. It refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.

Religion and Belief

Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live for it to be included in the definition.

Gender

A man or a woman.

Sexual Orientation

Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes

EQUALITY AND PREVENT DUTY

Equality Duty

Following the introduction of the Equality Act 2010 (Specific Duties) Regulations 2011, the Company developed a Single Equality Scheme to ensure that the Duty placed upon it was covered and that due consideration was being given to the requirements of the Duty itself.

The Equality Duty covers the nine protected characteristics. It is unlawful to discriminate against any individual or group on the basis of one, or more, of these protected characteristics:

- Age Disability
- Gender reassignment
- Pregnancy and maternity
- Race, including ethnic or national origins, colour or nationality
- Religion or belief, including lack of belief
- Sex
- Sexual orientation

Talented Training Ltd directly reports retention and success data for learners within some of these characteristics. The Company then has a series of arrangements in place to take due regard of individuals and groups within the other categories. This document outlines the Company's approach to ensuring that staff and visitors are treated fairly and consistently.

EDIMS Information to link to this Policy, Governance and Marketing

PREVENT DUTY

Talented Training Ltd continually reviews its practices to ensure that it is complying with the Prevent Duty as set out in the Counter terrorism and Security Act 2015. The requirements of the Prevent Duty are covered within this document, which is reviewed on a regular basis, annually at least, to ensure that the organisation has sufficient arrangements in place to educate, and keep safe, its learners, staff, employers, visitors and apprentices, and to react to a situation which falls under this legislation.

The Company focuses on the development of a culture in which everyone feels safe and respected and has the confidence to inform others of any potential risk to individuals or groups.

As part of this ethos the Company has considered the Prevent Duty and the importance of collaborative working between Company staff, local authorities, police, other educational institutions, policy makers and health providers to identify, detect and safeguard vulnerable people throughout the organisation.

British Values are promoted and embedded these into lesson planning and the tutorial pastoral cycle. Talented Training Ltd's Observation of Teaching and Learning Processes now take account of the Prevent Duty and British Values:

- Democracy The rule of law
- Individual liberty Mutual respect
- Tolerance of those with different faiths and beliefs.

REPORTING DISCRIMINATION, HARASSMENT OR BULLYING

All staff are responsible for recognising and dealing informally with any incident of bias, stereotyping or discrimination. Where a learner wishes to report an incident of bias or stereotyping or discrimination the personal coach or a member of the teaching team will be happy to discuss the matter (Company Complaints Procedure).

Should staff feel that an incident of bias or stereotyping or discrimination has occurred they should report it to their Line Manager and/or through use of the Company's Harassment or Grievance Procedure.

STAFF

Please report incidents to your Line Manager or a member of the Senior Leadership Team. Formal cases will be dealt with through the Harassment Procedure, Grievance Policy and/or the Disciplinary Policy as appropriate to each individual case.

REPORTING HATE INCIDENTS

A hate incident is any type of incident perceived to be racist, homophobic or driven by other prejudice by the victim or any other person. If you experience or witness a hate incident, please report it to the Safeguarding Team.

CYBER BULLYING AND HARASSMENT (SOCIAL MEDIA)

Bullying and harassment by other staff which takes place outside of business hours but impinges on staff welfare/wellbeing will be dealt with in accordance with Company policies and procedures.

CONSULTATION

Staff feedback is obtained through appraisals, informal feedback, standardisation/team/SMT meetings, the Company's noticeboard arrangements and through the Company's website.

IMPACT ASSESSMENT AND MONITORING

Apprentices/Learners

To inform the setting of targets and to assess the effect of the equality policy, Talented Training Ltd will collect and analyse the following information by ethnicity, gender, age, ability, and where applicable, sexual orientation and faith:

- Group profiles of apprentices
- 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

- Apprentice satisfaction feedback
- Complaints by apprentices or their employers

Staff

To inform the setting of targets and to assess the effect of the equality policy, Talented Training Ltd 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

MONITORING

The Operations Manager will regularly brief the Senior Leadership Team on the progress in promoting equality and diversity for the Apprenticeship Programme. On an annual basis the Operations Manager will provide a full report to the Governance Group of the performance and outcomes of equality and diversity issues including self-assessment results and progress, the results of stakeholder feedback.

REVIEW

This policy will be reviewed on an annual basis or following changes to ESFA or Government updates, as well as statutory guidance in relation to Covid-19 and company risk assessment policies and processes.

Managing Director's Signature



Marios Chrysostomou

Date: 01/01/2022