

Equality, Diversity and Inclusion Policy

Introduction

SR Apprenticeships is a community where everyone can contribute and be appreciated for who they are. All staff, learners and representatives help to make our talented community what it is. We strive to provide an inclusive, respectful and considerate environment where you are supported to accomplish your goals.

SR Apprenticeships is committed to the promotion of equality of opportunity for all and take equality & diversity responsibilities seriously. By promoting awareness of our beliefs, values and behaviours to staff, learners and other individuals, we ensure that all of those who we work with will be treated with the respect and dignity regardless of their skills, needs, limitations, beliefs, culture or values.

It is our belief that every individual has the right to equal access to training and no individual should be denied the opportunity to have a career and work towards achieving their goal. All learners will be treated with respect and dignity.

We rely on and value the opinions and views of our staff, learners, employers, subcontractors and parents. We actively seek the opinions of learners, employers, subcontractors and parents and use the feedback taken from surveys to improve upon the services that we deliver.

We intend to strengthen our commitment to equality & diversity by promoting fairness in all aspects of our work.

Policy Scope

This policy covers all aspects of SR Apprenticeships business and applies to staff, associates, learners and their respective employers. It relates to activities taking place on SR Apprenticeships premises and at other sites where staff, associates and learners may be working and learning.

This policy applies to all workers including staff, consultants, temporary workers, agency staff, secondees and other third parties working on behalf of SR Apprenticeships. It applies to the Board in the discharge of their duties. It also applies to suppliers, sub-contractors and agencies in our supply chain.

This policy applies in our employment practices, and across all areas of our training provision.

Purpose

SR Apprenticeships is committed to providing equal opportunity and to avoiding unlawful discrimination, harassment and bullying of staff, associates and learners.

SR Apprenticeships is committed to recognising and removing the barriers that prevent or make it difficult for anyone to use our services; these barriers include the physical environment as well as the attitudes and behaviours of staff – including part-time and contracted staff – learners/apprentices and the policies and procedures we put in place.

This policy is intended to assist SR Apprenticeships to put this commitment into practice.

SR Apprenticeships does not tolerate any prejudicial, discriminatory behaviour, bullying, harassment, or victimisation.

SR Apprenticeships will seek to promote equal opportunity and prevent discrimination, harassment and bullying by communicating and sharing this policy, and in its work and engagement with learners/apprentices and employers.

The organisation will monitor this policy and practices to ensure that these principles are upheld. It is the right of all staff, associates and learners/apprentices to be treated with dignity and respect and it is the responsibility of all concerned to treat others with dignity and respect.

SR Apprenticeships will endeavour to drive beyond compliance in order to promote best practice in equality & diversity in all our activities for the Apprenticeship Programme through working in partnership and sharing best practice with others. We will promote equality & diversity to all our partners and stakeholders and ensure that our marketing and advertising actively reflects this. Stakeholder surveys and internal audits are conducted regularly and we use the results to help us to review and renew our policies and procedures.

In line with this policy, SR Apprenticeships will:

- Promote an ethos that positively reflects the organisation's commitment to equal opportunities
- Ensure that all learners/apprentices, staff, and associates are aware of the policy
- All learners/apprentices, staff and associates are required to comply with this policy
- All SR Apprenticeships staff and associates are required to undergo bi-annual EDI training which is formally recorded against their record by the HR Team
- Provide a complaints process so that learners/apprentices, staff, and associates can report any incidents
- Provide an accessible, physical learning environment
- Provide a supportive learning environment
- Provide support to learners/apprentices by putting an Individual Support Plan in place for learners/apprentices with a disability or special educational needs
- Ensure that staff, associates, learners/apprentices are familiar with SR Apprenticeships Safeguarding and Prevent procedures

- Ensure staff, associates, learners/Apprentices are familiar with SR Apprenticeships use of IT policy
- Monitoring this policy and practices.

Mission statement: Providing access to high quality apprenticeships and professional education, in order to transform the skills landscape.

Vision: To become a widely recognised and respected leading levy focused apprenticeship training provider for our progress in securing consistently high-quality apprenticeships and positive experiences for employers and learners in England.

Values: SR Apprenticeships strives to deliver a quality service, the four values which underpin our organisation's culture are:

- EXCELLENCE/QUALITY: Delivering high quality products for all our customers and inspiring others to do the same. Always seeking continuous improvement
- ACCOUNTABILITY: Responsible for our actions and the guidance we give
- PROFESSIONAL Acting fairly, honestly and transparently in order to be trusted and consistent in everything we do.
- COLLABORATIVE & INCLUSIVE Recognising and valuing the input of others and encouraging strong partnerships through effective communication

Policy Implementation

To achieve equality of opportunity SR Apprenticeships will endeavour to achieve a harmonious environment at its training programmes for the Apprenticeship Programme and therefore will not tolerate any form of unlawful or unfair discrimination, harassment or victimisation.

SR Apprenticeships will promote full compliance with relevant legislation and associated code of practice relating to equality of opportunity.

SR Apprenticeships has developed a strategy that has taken into consideration current legislation, business needs, and available resources.

Overall responsibility for the implementation of this policy is vested in the SR Apprenticeships Board who will monitor its implementation through Key Performance Indicators. Equality and Diversity will be a standing agenda item at every Board meeting.

Learners and their employers will be advised about this policy as part of their induction and sign-up procedures. It is the responsibility of all staff, learners and associates to accept their personal involvement in the practical application of the policy.

All staff and learners are responsible for ensuring that unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010 do not occur in the areas for which they are responsible and working in and for dealing promptly with any incident of which they are aware. All staff and learners have a duty to adopt personal standards of behaviour and treat all colleagues and learners with dignity and respect. All learners have a responsibility to ensure that their behaviour creates an environment that is free from any form of unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010.

Every member of staff, associate and learner/apprentice has a responsibility to:

- Listen to what others say and respect their point of view
- Treat others with dignity and respect
- Report any incident of discrimination, harassment or bullying
- Question their own prejudices and assumptions
- Familiarise themselves with the responsibilities that equalities legislation places on them

Commitment to and engagement with the policy will be maximised by the following activities:

Inclusion and Diversity Champion

SR Apprenticeships appoints one member of the Team that is identified as the Inclusion and Diversity Champion. Their role is to:

- Support engagement with and implementation of this policy through communication and promotion of inclusion and diversity
- Train and support other team members in understanding their responsibilities in their delivery and other work with learners, apprentices, and employers
- Engage with local community partnerships and employers to ensure their needs are met in relation to equality and diversity, and to support continuous improvement of equality and diversity practice within SR Apprenticeships in meeting these needs
- Working alongside the SR Apprenticeships Safeguarding and Prevent Lead and British Values Champion in support of their responsibilities.

Communication and Promotion

- The policy is shared with all staff, associates, learners and apprentices and their employers
- The policy is included within learner and staff handbooks
- The policy is published on the SR Apprenticeships website
- The policy is highlighted at least annually in the monthly newsletter
- Equality and diversity and this policy is discussed with apprentice employers to raise awareness and engagement and ensure there are processes in place to protect apprentices and raise related issues
- Equality and diversity are discussed at apprentice and employer review meetings

Training and development

For staff -

- New staff are briefed on this policy and its implementation, and trained in equality and diversity during induction
- Existing staff are re-briefed on this policy and its implementation, and re-trained in equality and diversity every two years, with an annual update/highlight through the monthly team communication
- Training is monitored through the SR Apprenticeships Single Central Record and within the Performance and Development Review process
- Staff with teaching and learning responsibilities are trained in embedding equality and diversity into their practice and the content of their delivery with learners and apprentices, and in their engagement with employers
- All learners and staff are provided with the opportunity to develop their skills and confidence and to deal with equality & diversity issues in a professional manner
- Staff complete Ethics training in line with company policies
- Staff complete and observe internal training & events in line with company policies
- Learners complete Equality & Diversity training as part of their curriculum
- SR Apprenticeships ensures that staff are aware of the issues that can affect minority groups and other learners affected by disabilities

• SR Apprenticeships takes reasonable steps to ensure suitable resources are made available and are used effectively to support equality & diversity

For learners/apprentices -

- Learners/apprentices are briefed on this policy and how to raise a related issue, and trained in equality and diversity during induction
- Equality and diversity are discussed and monitored as part of apprentice skills coaching sessions and learner tutorials
- Courses are provided at various levels, so learners have a choice that is commensurate with their ability, and with delivery to suit their needs
- Ambition is fostered and progression is encouraged, whether into further courses, higher education or continued employment
- We have a visionary and innovative way of providing appropriate, relevant and innovative learning for all those engaged in classroom-based, work-based and community learning
- Learners are prepared for continued employment, or further progression, with the aim of producing well-rounded individuals who can fit in with and contribute to society

Engagement with employers

Equality and diversity and this policy will be discussed with apprentice's managers at induction to promote engagement and ensure that appropriate workplace policy and procedures are in place to protect apprentices.

The SR Apprenticeships Inclusion and Diversity Champion will engage with local partnership/ employer groups to identify their needs, benchmark best practice against this policy and practice and ensure continuous improvement.

Recruitment and Selection

This policy is key to appropriate practices in the recruitment and selection of staff and will be implemented by ensuring:

- Role profiles setting out clear accountabilities and a person specification, including responsibility for meeting the requirements of this policy
- Advertising practices that reflect equality and diversity and do not disadvantage candidates
- Selection practices that are accessible and do not disadvantage candidates
- Using only criteria set out in the role profile in the selection of candidates
- Induction content that includes the briefing of this policy, and training in equality and diversity

A separate Recruitment and Selection policy is in place which reflects the implementation of this policy.

Other Employment Practices

In addition to recruitment and selection, SR Apprenticeships is committed to equality and diversity across all employment practices and the review of policies and procedures will incorporate any changes necessary to continue to reflect the implementation of this policy.

Monitoring and Participation of Achievement

SR Apprenticeships is committed to using the views and opinions of our learners and other stakeholders to improve our services and welcomes feedback/suggestions from all stakeholders on better ways to promote equality and diversity on our training programmes. Raytheon will endeavour to track the progress of all learners ensuring that our systems and procedures take into account their needs.

SR Apprenticeships regularly monitors and reviews a variety of information to assess and support the effectiveness of this policy. Data is processed in accordance with the Data Protection Act 2018.

- S R Apprenticeships routinely collects and analyses information on staff, applicants and learners by age, gender, marital status, and ethnic origin. Information regarding the number of staff and learners who declare themselves as disabled is also maintained
- S R Apprenticeships will monitor staff data on an annual basis in relation to recruitment, selection, learning and development and equal pay to assess the equality of opportunity afforded to staff, and the diversity balance achieved in our workforce
- Data on learner recruitment, retention and achievement will be analysed and evaluated by demographic breakdown on a regular basis to consider the parity of starts, outcomes and retention between different groups
- Staff and Learners are consulted through the Inclusion and Safeguarding Working Group,
 Staff Forum and Learner surveys to gain their input and feedback in relation to equality,
 diversity and inclusion
- Partner policies in relation to equality and diversity are verified annually as part of annual contract reviews.

Equality and Diversity and Apprenticeship Programme Delivery

Equality and diversity are embedded throughout all stages of our apprenticeship training programmes and is implemented through the following actions:

- Where SR Apprenticeships is asked to support the recruitment of an apprentice for an employer, this will be carried out in line with the SR Apprenticeships Safer Recruitment and Selection Policy, using practices that support equality and diversity
- The promotion and marketing of apprenticeship programmes will avoid the use of discriminatory language and approaches to recruitment
- Processes for the recruitment of apprentices onto an apprenticeship training programme, including initial diagnostic activities and assessment of eligibility, will not preclude any individual from joining an apprenticeship programme on the basis of a protected characteristic
- Enrolment processes will capture information relating to SEND so that an Individual Support Plan can be put in place where required and in agreement with the apprentice. This will incorporate any reasonable adjustments and special considerations to enable fair access to teaching, learning and assessment. SR Apprenticeships staff working with the apprentice will be briefed on

- the support agreed with the apprentice and ensure that the apprentice is not disadvantaged
- The Designated Safeguarding Lead will undertake a risk assessment for any apprentice with SEND requirements to ensure they can access a safe place to learn.
- Apprentices will be given access to this policy and their induction will include input on equality and diversity. They will be briefed on action to take if they have an equality and diversity concern
- Equality and diversity and this policy will be discussed with apprentice employers to ensure there are processes in place to protect apprentices and raise related issues
- Monitoring of progress, achievements and destination will include the analysis of data relating to SEND learners with actions planned and implemented to address any impact identified
- Equality and diversity will be discussed with apprentices at bi-monthly progress reviews and support given in addressing any issues that arise
- Equality and diversity will be embedded into teaching and learning activities as appropriate
- The learning environment will be planned to ensure that it is accessible to all apprentices
- Any reasonable adjustments and special considerations needed for on-programme assessment will be discussed with apprentices so that appropriate action can be taken
- Any reasonable adjustments or special considerations needed for end point assessment will be discussed with the end point assessment organisation.

Safeguarding and Prevent

A Safeguarding and Prevent policy and procedures are in place within SR Apprenticeships to protect individuals from harm, abuse, maltreatment, neglect, radicalisation, or exploitation. Staff, associates, learners/apprentices may become aware of a situation involving harassment and bullying as a result of a safeguarding/Prevent issue. Where this is the case, the Safeguarding and Prevent policy and procedures must be implemented alongside this policy.

Complaints

Complaints by Staff

Complaints by staff can be raised formally through SR Apprenticeships grievance procedure.

Complaints by Learners and Other Stakeholders

Learners and other stakeholders can raise a formal complaint through SR Apprenticeships Complaints Procedure.

SR Apprenticeships will endeavour to respond to all complaints promptly treating all complaints from learners/ stakeholders with the utmost respect and dignity.

Investigations of all complaints will be thorough and objective. We aim to resolve all complaints within a 21-day period from notification, keeping the complainant updated on the progress of their complaint.

We will provide clear information to staff, learners and other stakeholders on our Complaints and Appeals procedure. We will welcome feedback from all complainants on the quality of service that they receive in relation to complaints and use this feedback to improve our service.

Learners, staff, learner employers and parents who wish to provide feedback or make a complaint can discuss the matter with the Operations Manager.

Kevin Foreman, Operations Manager

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Definitions

Equal opportunity is the commitment to promoting equality and diversity in all aspects of the business to ensure that individuals are not treated less favourably due to their age, gender, marital status or civil partnership, sexual orientation, gender reassignment, race, ethnic origin, disability, religion or religious beliefs, pregnancy, or maternity - known as protective characteristics. **Discrimination** means treating people less favourably than others on the grounds of their age, gender, marital status or civil partnership, sexual orientation, gender reassignment, race, ethnic origin, disability, religion or religious beliefs, and pregnancy & maternity, whether this be direct or indirect by applying a provision, criterion, or practice, which disadvantages such persons. **Direct discrimination** is where a person is treated less favourably than another in comparable circumstances because of a protected characteristic. An example of direct sex discrimination would be refusing to employ a woman because she is pregnant.

Indirect discrimination occurs where a provision, criterion, or practice (PCP) applies to everybody, but the PCP:

- has a disproportionate impact on people with a protected characteristic,
- is to the disadvantage of a person with that protected characteristic, and
- is not a proportionate means of achieving a legitimate aim.

Associative discrimination is discrimination against an individual because they have an association with someone with a protected characteristic. An example of associative discrimination might be a non-disabled member of staff who is discriminated against because of action they need to take to care for a disabled dependent.

Perceptive discrimination is discrimination against a person because the discriminator thinks the person possesses a protected characteristic, even if they do not in fact do so. An example of this might be discriminating against a man who has gay friends because it is believed he is gay too. **Diversity** is recognising that individuals and groups of people are different.

Harassment is defined as any hostile unwanted, unreasonable and/or offensive behaviour, which adversely affects a person's dignity, self-confidence and well-being and creates a hostile environment and which leads to that person feeling intimidated, degraded, or humiliated.

Bullying is defined as repeated treatment with the purpose of controlling individuals or making them feel insecure or treatment that has that effect. This may be in person or using technology including the internet and social media.

Victimisation is defined as treating persons less favourably because of something they have done under or in connection with asserting their rights under any employment legislation or regulations.

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