

Equality and Diversity Policy

Re-approved:	August 2024
Review by:	August 2025
Authorised by	C Gavaghan (CEO)

1.0 Scope of this policy

- 1.1 This is an overarching policy on equality and diversity that applies across all the functions of Derwent Training Association (Derwent Training), including employment, teaching and learning, procurement and marketing and admissions. The implementation of the policy is linked to a number of related policies, procedures and practices, a list of which can be found at Appendix 1.
- 1.2 This policy applies to all learners, staff, volunteers, contracted staff, and visitors to our sites in respect of all aspects of the Company's provision and the employment relationship. All staff and learners have a right to work and learn in an environment free from bullying or harassment. Staff and learners are introduced to this Policy during their induction.
- 1.3 The Company will promote the principles of this policy in its dealings with its external contractors through having in place equality and diversity requirements as part of the tender process and documentation.
- 1.4 The Company will not tolerate any form of discrimination, bullying or harassment on the grounds of:
 - age
 - disability (including physical or sensory impairments, mental health, long term medical conditions such as epilepsy, HIV/AIDs, and neuro-diverse conditions such as dyslexia and ADHD);
 - gender;
 - gender reassignment;
 - maternity and pregnancy;
 - race (which includes ethnic or national origins)
 - religion or belief;
 - sexual orientation;
 - marital or civil partnership;
 - socio-economic status.

2.0 Responsibilities

- Strategic responsibility for equality lies with the CEO and the Board of Directors.
- The Senior Leadership Team will review equality and diversity issues for learners and staff.
- Directors, managers, staff, and learners share the responsibility for creating an environment that is free from discrimination and which promotes equality of opportunity and values diversity.
- Staff and learners must comply with the policy and treat others with respect at all times.
- Any incidence of discrimination or harassment will be taken seriously and dealt with sensitively. Where learners or staff encounter discriminatory practice or behaviour, including those by a person who provides a service on behalf of Derwent Training, they are expected to actively discourage it and/or to report the matter to their trainer or line manager. Appendix 2 outlines the types of unlawful discrimination.

- Staff also participate in equality and diversity training and other relevant development activities wherever possible.
- Managers are responsible for ensuring their staff understand equality and diversity issues and how to report any perceived discrimination or harassment. In addition, they are responsible for ensuring part-time staff are not disadvantaged in any way and that complaints of discrimination or offensive behaviour are dealt with promptly.
- Service providers working on Company premises are expected to operate within the law and are encouraged to adopt the terms of this policy.

2.1 **Commitment to Equality and Diversity**

We are committed to embedding equality and diversity through:

- Identifying and removing potential barriers that may prevent current or future staff and learners from reaching their full potential while studying or working for the Company;
- Providing an environment which values and celebrates diversity and is free from unlawful discrimination, harassment, or victimisation of any kind;
- Working towards creating a positive and safe environment where staff and learners feel secure and the diversity of all is respected.

In its commitment to learners, the Company undertakes to

- Deliver services to learners in a way which is sensitive to their cultures, ethnic backgrounds, beliefs, sexual orientation, gender, age, class, and disabilities;
- Ensure the curriculum offer reflects the needs of potential and existing learners and includes sufficient equality and diversity content.
- Promote styles of teaching and learning that support learners' individual needs.
- Provide appropriate support to assist all learners to achieve their potential;
- Make clear our expectations and commitments to equality and diversity in our marketing materials and events, during the learner admissions process and during induction.
- Analysing the impact of any major curriculum changes on learners and undertaking meaningful consultation where appropriate
- Promote learning opportunities to those in underrepresented group, for example, females, ethnic minorities.

In its commitment to staff, the Company undertakes to

- Ensure all policies and procedures promote equality of opportunity and are not unlawfully discriminatory in their operation;
- Work towards the achievement of a workforce that is representative of the diversity of the communities from which we recruit and the learner population;
- Ensure training, development and progressions opportunities are available to all staff;
- Arrange training for staff on relevant equality and diversity issues and include equalities issues in training on employment practices

- Consult with appropriate staff to identify any potential barriers to recruitment, promotion, and retention;
- Oppose all forms of unlawful or unfair discrimination in all aspects of employment including recruitment, promotion, opportunities for training, pay and benefits, discipline and selection for redundancy related to the protected characteristics.
- Analysing the impact of any major changes affecting staff and undertaking meaningful consultation where appropriate

3.2 Legal Context

The Company welcomes and abides by all statutory provisions on equality and diversity. The Equality Act, 2010, recognises nine “protected characteristics”:

- Race;
- Disability;
- Gender;
- Age;
- Sexual orientation;
- Religion and belief;
- Gender reassignment;
- Pregnancy and maternity;
- Marriage and civil partnerships.

Under the Act, the Company has a “public duty” to give due regard to:

- Eliminate discrimination, harassment, and victimisation;
- Advance equality of opportunity. This includes the need to:
 - Remove or minimise disadvantage experienced by persons who share a protected characteristic;
 - Take steps to meet the needs of people who share a protected characteristic that are different from the needs of people who do not share the protected characteristic. This includes taking steps to take account of disabled people’s impairments, even when that means treating disabled people more favourably or using positive action to achieve this duty;
 - Encourage persons with a protected characteristic to participate in public life or any other activities where participation is disproportionately low.
- Foster good relations – which can include tackling prejudice and promoting understanding between people of different groups.

3.0 Implementation

3.1 The Company has the following measures and plans in place to help it achieve equality and diversity for learners and staff:

- Mission and Vision;
- The Strategic Plan;

- Quality Performance Review meetings monitor equality and diversity issues in curriculum delivery;
- Equality and Diversity monitoring via the SAR process and quality improvement plans;
- Membership of or links with FE sector organisations that promote equality e.g., the Education and Training Foundation, Association of Employment and Learning Providers
- Staff and learner awareness raising events to support a range of equality and diversity events;
- Training in equality and diversity areas;
- Compliance with the Prevent Duty
- Companywide events that celebrate equality and diversity;
- Employer and learner surveys, learner and staff focus groups.
- A code of conduct for learners which specifically addresses equality and diversity issues.

4.0 Training, communication, and awareness

4.1 The Company is committed to using a number of different ways to communicate and promote our policy to ensure all our staff, Directors, learners, volunteers, and visitors:

- understand our commitment to equality and diversity;
- understand their responsibilities and role in the process;
- know where to seek advice and guidance;
- know how to make complaints and are confident that they will be handled effectively.

4.2 These methods will include equality and diversity being covered via;

- training/briefing meetings for all staff/Directors;
- briefings for employees;
- information on local notice boards and on the website;
- details in learner and staff handbooks;
- employee/learner individual induction;
- managers who can guide employees through the policy and procedures;
- articles in the staff newsletter;
- articles in the employer's newsletter.

5.0 Monitoring and evaluation

- 5.1 Learner enrolment, retention, and achievement, learner and employer surveys and complaints are annually monitored by ethnic group, gender, language, age, disability and learning difficulty and the findings used to inform the self- assessment process.
- 5.2 Learners' views on the implementation of the Policy are identified by means of learner surveys and focus groups.
- 5.3 All aspects of the employment process from recruitment, grievances, disciplinaries, and redundancies through to employment tribunal applications are regularly monitored by managers and Directors. Monitoring covers ethnic group, gender, age, disability, religion and belief, sexual orientation. The findings are used to inform employment and development strategies and to address any negative equality and diversity impact where identified.
- 5.4 The implementation of the Policy and the Monitoring Plan is scrutinised by Directors and by the Equality & Diversity Group.
- 5.5 Monitoring and review of equality issues feed into the SAR, Strategic Plan and Quality Improvement Plan. The Board of Directors and Senior Leadership Team receive reports arising from the monitoring of equality and diversity issues.
- 5.6 The following systems are proposed, or in place, to monitor and evaluate the equality and diversity impact of Derwent Training policies, services, courses, and curriculum:
 - Annual SARs;
 - Employer and learner surveys, learner and staff focus groups;
 - Equality Impact Assessments;
 - Equality Action Plans;

6.0 Equality & diversity group

- 6.1 This group will consist of the CEO, a director with equality & diversity responsibility, two staff (one academic and one from Business Support) plus an open invite to learners to attend.
- 6.2 There will be two meetings a year; held on different days of the week to maximise attendance.

Appendix 1

Links to Company Policies, Procedures, Practices

Strategic Plan

Self-assessment reports

Additional Learning Support Procedures

Safeguarding and Well-being Policy

General Data Protection Regulations Policy

Continued Professional Development Policy

Health and Safety policy

IT Acceptable User Policy

The equality act: types of unlawful discrimination

Direct discrimination is where a person is treated less favourably than another because of a protected characteristic. An example of direct discrimination would be refusing to employ a woman because she is pregnant.

Indirect discrimination is where a provision, criterion or practice is applied that is discriminatory in relation to individuals who have a relevant protected characteristic (although it does not explicitly include pregnancy and maternity, which is covered by indirect sex discrimination) such that it would be to the detriment of people who share that protected characteristic compared with people who do not, and it cannot be shown to be a proportionate means of achieving a legitimate aim.

Harassment is where there is unwanted conduct, related to one of the protected characteristics (other than marriage and civil partnership, and pregnancy and maternity) that has the purpose or effect of violating a person's dignity; or creating an intimidating, hostile, degrading, humiliating or offensive environment

Associative discrimination is where an individual is directly discriminated against or harassed for association with another individual who has a protected characteristic (although it does not cover harassment because of marriage and civil partnership, and pregnancy and maternity).

Perceptive discrimination is where an individual is directly discriminated against or harassed based on a perception that he/she has a particular protected characteristic when he/she does not, in fact, have that protected characteristic (other than marriage and civil partnership, and pregnancy and maternity).

Third-party harassment occurs where an employee is harassed and the harassment is related to a protected characteristic (other than marriage and civil partnership, and pregnancy and maternity), by third parties such as clients or customers. For an employer to be liable:

- the harassment must have occurred on at least two previous occasions (although not necessarily by the same harasser or suffering the same type of harassment);
- it must be aware that the previous harassment has taken place; and
- it must have failed to take reasonable steps to prevent harassment from happening again.

Victimisation occurs where an employee is subjected to a detriment, such as being denied a training opportunity or a promotion because he/she made or supported a complaint or raised a grievance under the Equality Act 2010, or because he or she is suspected of doing so. However, an employee is not protected from victimisation if he or she acted maliciously or made or supported an untrue complaint. There is no longer a need for a complainant to compare his or her treatment with someone who has not made or supported a complaint under the Equality Act 2010. For example, if a blind employee raises a grievance that the employer is not complying with its duty to make reasonable adjustments, and is then systematically excluded from all meetings, such behaviour could amount to victimisation.

Previous equality legislation recognised disability-related discrimination. The Equality Act 2010 replaces this with two new causes of action in relation to disability – indirect discrimination (see above) and **discrimination arising from a disability**. The latter occurs when a disabled person is treated less favourably because of something connected to their impairment.

Failure to make reasonable adjustments happens when an organisation fails to make reasonable adjustments for a disabled person, to avoid the disabled person being placed at a substantial disadvantage when compared to a non-disabled person.

In the majority of cases, the Service will be legally liable if a court found that discrimination, harassment, or victimisation had occurred. However, it is also important to realise that individuals can also be held responsible for their own actions.

Customers, suppliers, and other people not employed by the Company

The Company will not discriminate unlawfully against customers using or seeking to use goods, facilities or services provided by the Company.

Employees and learners should report any bullying or harassment by customers, suppliers, visitors, or others to their manager who will take appropriate action.

The Company will seek to choose suppliers who work within an Equalities Framework. This requirement is reflected in the tender process and documentation. Where a supplier is found to have breached the Equality & Diversity requirements of the Company and the Equalities Act the contract will be terminated with immediate effect.

Equality & Diversity Monitoring Plan

Ref	Target		Impact measure(s)		Target/review Date
1	All imagery must reflect and celebrate diversity		<ul style="list-style-type: none"> Employers, learners, and external stakeholders will be visually aware that the Company is inclusive of all backgrounds Derwent Training will attract learners from all ethnicity and diverse backgrounds Learners will be better educated in different cultures and celebrations and staff will be more knowledgeable when dealing with sensitive topics. 		Sept 2023
	Actions	Lead	Milestone Dates	Progress and impact	RAG
1.1	Continue to ensure learner imagery in publications, display materials, website, and internal wall displays reflects and celebrates diversity	Business Support All staff		Imagery is varied across all platforms and represents all aspects of community.	Green
1.2	Continue to monitor learner perception of equality & diversity and incidence of discrimination and harassment through learner surveys, complaints, and safeguarding reporting	CEO		<p>Current survey show respondents are</p> <p>12% of on-programme learners are non-white British</p> <p>10% have a learning difficulty</p> <p>2% describe themselves as LGBT+</p> <p>16% describe themselves as having a religion or belief.</p> <p>Survey results (June 2022) indicate agreement that Derwent Training...</p> <p>Encourage respect for faith/beliefs or none 90%</p> <p>Deals with bullying/harassment well 90%</p> <p>Feel safe at Centre 96%</p> <p>Feel safe at work 96%</p>	Green

				There have been no complaints or safeguarding issues around E&D matters.	
1.3	Ensure full promotion of equality & diversity commitments through the learner journey	All staff		A full series of Breakfast Briefings occur covering a variety of topics (male suicide, Movember, gambling in young people, alcohol abuse etc.), together with offered support around mental health especially during the pandemic. We have also provided employers with resources to support female apprentices in the workplace as their WD rate is generally higher (though smaller cohort). However, there is more that could be done around role models and expanding learners' knowledge of the impact of current issues on E&D.	Green

Ref	Target		Impact measure(s)		Target Date
2	Monitor gender profiles		<ul style="list-style-type: none"> Proportion of females increases to 15% Achievement gap between males and females is 1 percentage point or less (and above NR) 		Sept 2023
	Actions	Lead	Milestone Dates	Progress and impact	RAG
2.1	Continue to monitor gender profiles at the course level and promote provision through imagery and course literature that challenges gender stereotypes	Quality Manager		<p>Two percent of on-programme learners are female. The target is challenging and does represent a significant step change in profile. Images of female engineers are used across social platforms and there are examples of female engineers around the training centre.</p> <p>What is evident is that female engineering apprentices are less likely to complete through either losing their job or deciding the profession is not for them. We have provided employers with resources to</p>	Green

				support them supporting females. We have also developed videos of female apprentices which are used in social media to attract individuals to the profession.	
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Ref	Target	Impact measure(s)			Target Date
3	Analyse ethnic minority group learner achievement rate trends	<ul style="list-style-type: none"> Achievement gap between ethnic groups is 1 percentage point or less (and above NR) 			Oct 2023
	Actions	Lead	Milestone Dates	Progress and impact	RAG
3.1	Undertake an achievement analysis to evaluate achievement rate trends for ethnic group learners to identify curriculum plan actions required to ensure any discernible gap analysis is addressed.	Quality Manager		Achievement rates are available and there is no discernible disadvantage to any non-white ethnic group. The cohort number for this group is still relatively small though representative of the demographics locally. Nevertheless, this needs to be monitored regularly to identify any change early.	Green

Ref	Target	Impact measure(s)			Target Date
4	Produce a mid-year report of performance outcomes for learners in receipt of additional support	<ul style="list-style-type: none"> Achievement gap between those with declared learning disability or difficulty and those who do not is 1 percentage point or less (and above NR) All learners who declared learning disability or difficulty will be assessed and assigned ALS as appropriate 			May 2023
	Actions	Lead	Milestone Dates	Progress and impact	RAG
4.1	Establish a mid-year report for the outcomes of learners in receipt of additional learner support	CEO		Learners in receipt of ALS funding in 2021-22 made good progress on their	Green

	to enable targeted interventions for at risk learners.			apprenticeship.	
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Ref	Target	Impact measure(s)			Target Date
5	Complete an annual Equality & Diversity audit/report in autumn term	<ul style="list-style-type: none"> Consistent awareness of equality & diversity across the Company Learners show an awareness and acceptance of differences between themselves Achievement gaps between groups of different learners is 1 percentage point or less (and above NR) 			October 2023
	Actions	Lead	Milestone Dates	Progress and impact	RAG
5.1	Ensure an annual equality & diversity report is completed and presented to the SLT and Board of Directors and integrated into QIP	CEO		The report is essentially this monitoring plan with progress against targets. Directors to review, challenge and provide direction as appropriate. However, as more data becomes available, a decision will be taken whether a more detailed report is required.	Green
5.2	Promote diversity in learner cohort and new enrolments from black and minority ethnic learners	Business Support		Twelve percent of learners identify as non-white against a target of 3%. The current figure is slightly higher than last year.	Green
5.3	Promote recruitment of learners to non-stereotype training opportunities	Business Support		Imagery of females and BAME engineers are used when advertising Derwent Training. Whilst the engineering sector is dominated by applicants that are white British males, 12% are non-white and 2% are female.	Green

5.4	Review progress and destination data for gender differences	Quality Manager		If an apprentice stays on-programme they achieve and there is no gender difference. However, the withdrawal rates show females tend to be less likely to remain on-programme (see point 2.1)	Green
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Ref	Target	Impact measure(s)			Target Date
6	Ensure the Training Provider as an employer is accessible to all	<ul style="list-style-type: none"> • Safer recruitment practices ensure the best candidate is employed regardless of any of the protected characteristics • All members of staff can access the building 			Sept 2023
	Actions	Lead	Milestone Dates	Progress and impact	RAG
6.1	Ensure the staff have access to work related opportunities (within reasonable adjustments)	CEO		The staff involved in recruitment have completed Safer Recruitment training. Support is provided by an external consultant who also ensure there is no bias or discrimination in recruitment.	Green
6.2	Ensure Derwent Training has training facilities that are accessible (within reasonable adjustments)	CEO		All areas of the building are accessible to all users.	Green

Ref	Target	Impact measure(s)			Target Date
7	Ensure that all learners and staff promote good citizenship values <ul style="list-style-type: none"> ➤ Democracy ➤ The rule of Law ➤ Individual Liberty ➤ Mutual respect and tolerance of different faiths and beliefs and of those without faith. 	<ul style="list-style-type: none"> • All staff and learners understand British Values, how they relate to their life's and how they are used in the workplace as well as the UK 			Jan 2023

	Actions	Lead	Milestone Dates	Progress and impact	RAG
7.1	Embed into the induction for all new learners and staff	All staff		British values are embedded into induction and staff have received training on it with access to materials.	Green
7.2	Staff to embed, where appropriate, into the strands of the learner journey	All staff		Lesson observations show there is reference to British Values where it is appropriate to do so. However, it is not always done well.	Amber
7.3	Derwent Training displays British Values within its activities.	All staff		There has been progress. For example, encouragement to register to vote in elections and reminders to take part on election day. Whilst there are signs up saying British Values there is little that actually, engages individuals.	Amber
7.4	Where appropriate, embed the wider Prevent agenda and British Values into the planning of learning.	All staff		91% of learners stated that they understood issues associated with radicalisation and 91% stated they knew what to do if they became aware of instances of radicalisation.	Green