



Independent Training & Education Consultants

Equality, Diversity and Inclusion Policy

Last Reviewed: June 2021

By:

Directors: Susan Waters
Gerard Morrall

Signed by:

A handwritten signature in black ink, appearing to read "Gerard Morrall". The signature is written in a cursive style and is positioned to the right of the "Signed by:" text.

Date: 30.06.21

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Policy Statement

This policy applies to all staff who are employed by ITEC. The policy also applies to:

- consultants and subcontractors whilst carrying out functions on behalf of ITEC
- Volunteers, apprentices and stakeholders participating in activities with ITEC.

This policy is reviewed and amended with feedback from staff, apprentices and stakeholders. This policy is promoted to:

- Staff during induction, through policy amendment and update, at relevant EDI training events and it is kept in an accessible location on Teams.
- Apprentices during induction, through policy amendment and update, to support EDI training activity and a copy emailed for reference.
- Employers when an employer Commitment Statement is agreed, through policy amendment and update and a copy emailed for reference.

This policy is available in PDF format on the ITEC website.

Equality, diversity and inclusion at ITEC is about 'Everyone'. Richness of experience, insight and knowledge enhances our ability to carry out the work we do in the way we do and ensures that the vision, missions and values are part of the 'Everyday'. We all come from different backgrounds, have different family structures, come from different geographical places, believe in different gods or no god, see the world differently and have different abilities. The differences can be obvious, but some cannot be seen. Equality, diversity and inclusion at ITEC is not about offering preferential treatment or lowering standards but put simply, is about respecting differences, whether employees, partners or stakeholders and not allowing those differences to become a barrier to positively engaging and contributing.

Equality, diversity and inclusion are core to the values and objectives of ITEC. It is fundamental that people are treated fairly with respect and dignity and in accordance with ITEC values at all times.

ITEC's values are:

We are respectful –We treat other people as they wish to be treated

We are inclusive – We embrace diversity and work together to achieve

We are encouraging –We welcome challenges and celebrate success

We are realistic –We are transparent and truthful

We are solutions-focused –We inspire and innovate others

We are professional –We strive to be the best and deliver excellence

We are empowering – We support others to become stronger and achieve their aspirations

ITEC will not tolerate any discrimination, victimisation or harassment on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation.

ITEC will strive to take all practical steps to prevent discrimination (on any basis), to identify and address inequalities affecting specific groups and to promote equality during the course of its work, providing a respectful, inclusive, positive, supportive, challenging and empowering environment for all to achieve in.

ITEC recognises that every person has different needs, preferences and abilities and we strive to reflect this diversity in everything we do. This includes making our services and products inclusive and accessible to people from all sectors of the community and attracting and retaining a diverse workforce. By positively engaging with and valuing these differences and harnessing different life experiences, attributes and contributions ITEC will be a better place to work.

ITEC will monitor the conduct of actions taken under the framework of all our policies, including recruitment, in order to identify inequalities and formulate plans to address them, ensuring fairness of treatment at work under the 2010 equality Act and our cultural values.

ITEC Equality, Diversity and Inclusion Aims

ITEC is particularly committed to achieving equality of opportunity and outcome by elimination of any barriers that may prevent staff, apprentices and stakeholders from developing and achieving their full potential and making sure there are opportunities for everyone to flourish and to raise achievement.

ITEC recognises the general Equality Duty placed upon it by the Equality Act 2010 and our Equality, Diversity and Inclusion Policy sets out the commitment to meeting the general duty to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
- Advance equality of opportunity between people who share a protected characteristic and for those who do not.
- Foster good relations between people who share a protected characteristic and those who do not.

ITEC will:

- Promote inclusion through access to fair and relevant lifelong learning training services that meet individual needs, advance equality of opportunity and encourage engagement, participation and achievement.

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- Actively combat prejudice, harassment and discrimination in all its forms and eliminate barriers to remove or minimise disadvantages suffered by people due to their protected characteristics.
- Provide a culture in which apprentices, stakeholders and staff feel safe, respected and involved.
- Welcome diversity and foster good relations between people who share a protected characteristic and those who do not.
- Promote British Values in learning activity and embed the Fundamental British Values in our curriculum offer.
- Challenge extremist behaviours and promote the Prevent agenda.

Responsibility and Accountability

ITEC expect all staff, apprentices and stakeholders to:

- Engage, promote and implement ITEC's ethos of embracing equality, diversity and inclusion and achieving effective equality of opportunity
- Be familiar with Fundamental British Values
- Treat each other with respect and dignity
- Welcome diversity and value individual contribution
- Be fair and consistent
- Challenge and report inappropriate behaviour
- Tackle discrimination and address issues of inequality
- Engage and educate others around them
- Comply with this policy at all times and participate in policy review

All staff, apprentices and stakeholders are responsible to ensure the proper observation of the principles of this policy. In particular, this relates to the treatment of others so that the environment in which we operate is, as much as possible, free from prejudice, harassment and discrimination.

All staff, apprentices and stakeholders have a personal responsibility not to behave in a manner which fails to recognise the rights of others.

ITEC directors will ensure that all the staff, delivery partners, contractors and apprentices are aware and understand the policy on equality, diversity and inclusion and are aware of and understand the process for non-compliance.

The following roles have particular responsibilities:

ITEC Directors are responsible for ensuring that all aspects of this policy are applied appropriately. Directors will champion and lead by example by using policy and supporting resources to encourage the integration of equality, diversity and inclusion in all aspects of ITEC work.

ITEC Directors involve all staff in the creation and review of this policy, this helps to drive our ethos, our company vision and values and encourage participation from all staff.

ITEC staff will engage with and promote this policy and its content, staff will behave in a manner that supports the ITEC Values, adapting their behaviours, actively listening to others and taking appropriate steps to challenge discrimination of any kind.

Legal Context

Equality, Diversity and Inclusion is covered by UK employment legislation. The most important piece of legislation is the Equalities Act 2010 which was introduced in order to simplify many outdated laws and regulations which include (but are not limited to):

- Disability Discrimination Act 2005
- Employment Equality (Age) Regulations 2006
- Employment Equality (Religion and Belief) Regulations 2003
- Employment Equality (Sexual Orientation) Regulations 2003
- Mental Capacity Act 2005
- Protection from Harassment Act 1997
- Race Relations Act 1976
- Rehabilitation of Offenders Act 1974
- Sex Discrimination (Gender Reassignment) Regulations 1999
- Sex Discrimination Act 1975

ITEC is fully committed to the fulfilment of all agreements, regulations and acts which may have implications for our company and will comply fully with the letter and intention of these laws, regulations and treaties from the point of recruitment through to the end of any employment or training contract, amongst these are:

Equality Act 2010

The Equality Act prohibits discrimination by learning providers as employers and as a provider of services to apprentices. At the core of the legislation is the provision making it illegal to discriminate against people who have a 'protected characteristic'. The Act lists these characteristics as being:

Religion or Belief	Gender Reassignment	Disability
Sexual Orientation	Marriage and Civil Partnership	Race
Pregnancy and Maternity	Age	Sex

Pre-employment health questionnaires

Employers are no longer be able to ask questions about health and disability when considering candidates for a job, unless they can show that they need to determine whether applicants could carry out functions that are intrinsic to the role (for example where a role involves manual handling).

Discrimination arising from disability

Under the definition of disability, it is now easier for an individual to show that they are disabled and protected as the meaning for disability has become broader.

The disabled person no longer needs to show that their impairment affects a particular capacity such as hearing, eyesight, mobility or speech as they had to under the previous legislation.

A disabled person only need show that their physical or mental impairment has a substantial and long-term adverse effect on their ability to carry out normal day to day activities, such as using a telephone.

Discrimination arising from disability is where a disabled person is treated unfavourably because of something arising “in consequence” of their disability.

For instance, an individual suffering from dyslexia may have a tendency to make spelling mistakes. There would be discrimination on the part of the employer where he knows or ought to have known that the employee had such a disability and is treating the employee unfairly as a result. In this example, the spelling mistakes by the employee are “connected” to the disability.

Discrimination by perception

The Equality Act also develops the concept of discrimination by “perception”. This would involve a person being treated unfairly because they are wrongly perceived to have a protected characteristic. It might apply, for example, if a person is discriminated against because they are thought to be gay when they are not. Another example is where a prospective white employee submits a job application, but the employer rejects the application as wrongly assuming the job seeker to be Asian as he has an Asian sounding name.

Discrimination by association

The same principle and protection also extends to people who are treated unfairly because they associate with someone who has a protected characteristic. This is called “associative discrimination”. For example, an employee is refused flexible working arrangements even though it has been offered to others because that employee has caring responsibilities for a child or spouse who has a disability.

Indirect discrimination

Indirect discrimination includes disability and gender reassignment. Indirect discrimination occurs where an employer introduces a rule or policy that applies to everybody in the workforce but where such rule in turn creates a disadvantage for employees with a particular protected characteristic.

Harassment and victimisation

The Equality Act introduces the concept of “harassment by a third party”. This means that employers are potentially liable for harassment of their staff by people they don’t employ, such as customers and clients, if they do not take proper steps to address the same when they became aware of it. Employees also have extended protection where someone is treated badly because they have made or supported a complaint or grievance or complaint under the Act.

Equal pay

Employers can no longer enforce secrecy clauses in contracts of employment banning employees from revealing their pay rates to colleagues where they are related to protected characteristics such as race or sex. If an employer disciplines someone because they have become aware of such discussions, this could amount to victimisation under the Act.

Positive action

Positive action can involve treating members of a group who share one of the protected characteristics more favourably than other groups. This will be lawful if one or more of the following conditions are met:

- Disadvantages of a particular group are recognised.
- Particular needs of the group are met.
- Participation of the group is increased.

Other Legislation

As a provider of education and learning, ITEC recognises its duty to improve the participation and attainment of all people across all learning routes.

ITEC also recognises its duties and responsibilities under the Children's Act 2004, the Special Education Needs and Disability Act (SENDA) 2001 and the Government's Every Child Matters policy agenda. ITEC recognises the need to be vigilant in line with our Safeguarding and Prevent Policies and to promote Fundamental British Values in learning activity. ITEC is committed to ensuring every learner/apprentice, whatever their background or their circumstances, has the support they need to:

- Be healthy
- Stay safe
- Enjoy and achieve
- Make a positive contribution
- Achieve economic well-being

Freedom of Speech

ITEC believes that a culture of free and open discussion is essential in its role as a learning provider. This can only be achieved if all concerned behave with lawful tolerance and respect core our values and anti-discriminatory practices.

ITEC will protect potentially vulnerable individuals or groups, facilities will not be made available to speakers who advocate or incite unlawful racial hatred or discrimination on the grounds of race, religion, sex, class, sexual orientation, age or disability or who advocate or incite violence or harassment of any individual or group.

It is recognised that freedom of speech is limited by statute laws that protect individuals and groups of individuals from racial hatred or discrimination:

- Human Rights Act 1998
- Employment Equality (Sexual Orientation) Regulations 2003
- Employment Equality (Religion or Belief) Regulations 2003
- Race Relations Act 1976
- Race Relations (Amendment) Act 2000

- Equality Act 2010.
- Public Order Act 1986
- Crime and Disorder Act 1998
- Protection from Harassment Act 1997
- The Terrorism Act 2006
- The Racial and Religious Hatred Act 2006
- Criminal Justice and Immigration Act 2008.
- The Racial and Religious Hatred Act 2006

Section 26 of the Counter Terrorism and Security Act 2015 imposes a duty on the provider when exercising its functions, to have due regard for the need to prevent vulnerable individuals from being drawn into terrorism. This includes violent extremism as well as non-violent extremism intended to create an atmosphere conducive to terrorism. ITEC expects external bodies wishing to interact with ITEC to be open and honest regarding their identity. External speakers will be subject to risk assessment in line with the Prevent risk assessment.

Organisation of Equality, Diversity and Inclusion

The Equality, Diversity and Inclusion policy is incorporated and embedded into all our activities. Enactment of the Equality, Diversity and Inclusion policy is the responsibility of all within ITEC and all directors, staff, apprentices and contractors have a duty to comply with ITEC's policies.

Working with Employers and Work Placement Providers

ITEC will work closely with employers and work placement providers to ensure the vision for Equality, Diversity and Inclusion is effectively implemented and integrated into each and every partnership.

Equality, diversity and inclusion is an integral part of the assessment of an employer location and an agreement will be utilised to gain a commitment from the employer to observe all relevant legislation and policies including ITEC's Equality, Diversity and Inclusion policy, the Young Persons Act, and the Equality Act.

Where it is brought to ITEC's attention that an employer has behaved inappropriately towards a learner, or there is an equality issue, ITEC will work with that learner and employer to resolve or refer the issue.

ITEC will subsequently review their relationship with the employer and if necessary, withdraw any future services where the employer is unable to work with ITEC towards a mutually agreeable outcome.

Marketing

The design and production of marketing and promotional materials will be produced by ITEC. During this process careful consideration will be given to equality, diversity and inclusion within a 'creative brief' to ensure the tone, content and imagery used will be representative and appropriate to target the audience and, where required, attract hard to reach and under- represented groups.

Advertising:

- The statement “ITEC is an equal opportunities employer” will appear on all job advertisements.

Staff Recruitment and Selection:

ITEC is committed to finding the best qualified person to carry out any job as advertised, regardless of age, race, creed, colour, nationality, sex, sexual orientation, etc, and to demonstrate the organisation’s commitment to this all-job applicants will receive a copy of this policy.

Job Descriptions:

- Job Descriptions and person specifications will be prepared for all posts. The job description will indicate the responsibilities and tasks to be undertaken by the jobholder. The person specification will describe the qualifications, skills and abilities required. A list of preferred criteria may also be prepared. Care will be taken to ensure that neither the description nor the specification as discriminatory on the grounds quoted in the Policy Statement.

Short-listing for candidates:

- It is essential that applicants are short-listed on the basis of objective criteria. This will be based on the extent to which candidates have shown, in the application form that they meet the required job specification and can carry out tasks and responsibilities required of the post-holder. Qualifications and standards of literacy will only be considered when these are recognised as necessary for a particular job.
- Short-listing will be checked, and interviewing done by the directors of ITEC.

Interviews:

- The directors of ITEC will carry out interviews and ensure that irrelevant and discriminatory questions are excluded.
- Questions regarding personal circumstances necessitated of applicants for particular jobs which require unsocial hours overnight or prolonged absence from home etc should be asked of all applicants interviewed.
- Staff will be made aware of action which would contravene the Equality, Diversity and Inclusion Policy and would be subject to disciplinary procedures.
- ITEC will take seriously complaints of discrimination on the grounds listed in this policy and will not victimise people who make such complaints.

Workforce development and support

ITEC has a dedicated staff development policy, which provides a framework for consistency, and will ensure a fair, equitable and consistent approach is applied to the study for professional qualifications and other learning activity.

The policy will ensure equality of access to qualifications, training and development opportunities enabling staff to have the knowledge, skills and experience to effectively carry out their roles, thereby enabling ITEC to achieve its objectives and aims.

Induction training will include the issue and explanation of the Equality, Diversity and Inclusion Policy and an introduction to our values and company vision.

Staff undertake an annual update on Equality, Diversity and Inclusion and Safeguarding and the Prevent Duty to familiarise themselves with any updated. All delivery staff are encouraged to take an active role in EDI and sector updates to ensure that Equality, Diversity and Inclusion is embedded in the curriculum, particularly apprenticeship programmes. All staff take part in annual policy review to drive our company vision and values and to promote engagement with this policy.

Apprentices

ITEC are committed to listening to the needs of all learners to ensure that where possible and reasonable, practicable adjustments are made to assist apprentices in achieving their programmes. Equality, diversity and inclusion will be discussed with each apprentice at the beginning and throughout their learner journey and included a discussion of their rights and responsibilities to others. Apprentices will be introduced to Fundamental British Values: Rule of Law, Democracy, Individual Liberty and Mutual Respect, these fundamental values will be contextualised in learning activity.

All apprentices will undergo an initial assessment with a qualified member of staff to identify their individual needs and discuss how these needs can be met. The assessment includes learning styles, prior learning and strengths which are embedded within the apprentices' plans and takes account of aspects that may require differentiation in training delivery.

Individualised support will be continued through the review process during which any obstacles or concerns will be discussed and addressed to ensure the apprentice is able to achieve their planned programme.

Where an obstacle is identified ITEC will work closely with other agencies to ensure that, where possible, reasonable adjustments are made, and additional support provided to ensure that apprentices and clients have access to fair teaching and assessment.

Adjustments

ITEC will consider all requests from apprentices including special dietary requirements, time off for religious purposes, reasonable adjustments to premises, equipment, learning and assessment. Each request is considered on its' own individual merits, considering the needs of the business, available resources and any financial or assessment implications. Where possible ITEC will endeavour to accommodate all such requests, unless there is justification that an adverse impact may occur or there are factors present outside of the control of the organisation.

Where adjustments include changes to delivery that are not feasible ITEC will ensure that alternative provision is signposted for the apprentice to ensure they are not disadvantaged in any way.

Learning and Wellbeing

Health, wellbeing and inclusivity will be embedded into learning, teaching, training and assessment to narrow achievement gaps between groups of apprentices and to promote health and wellbeing. Inclusive learning in health and wellbeing ensures that apprentices develop the knowledge and understanding, skills, capabilities and attributes which they need for mental, emotional, social and physical wellbeing now and in the future.

Positive promotion of health and wellbeing enables apprentices to:

- make informed decisions in order to improve their mental, emotional, social and physical wellbeing.
- experience challenge and enjoyment
- experience positive aspects of healthy living and activity for themselves
- apply their mental, emotional, social and physical skills to pursue a healthy lifestyle.
- make a successful move to the next stage of education or work.
- establish a pattern of health and wellbeing which will be sustained into adult life.

Inclusive teaching and learning will include:

- use of materials and teaching methods that are sensitive to, and promote, equality of opportunity and good race relations.
- maximising opportunities within all learning contexts to promote equality of opportunity and awareness of cultural and linguistic diversity.
- Adapting learning activities to suit the needs of all learners/apprentices.
- reinforcing apprentices' knowledge and understanding of equality and diversity and preparation for living in a multicultural society through teaching and learning
- use of enrichment activities and / or extended services, including work experience to increase apprentices' enjoyment and achievement and their personal, spiritual, moral, social and cultural development.

Monitoring and Evaluation

ITEC acknowledges that in order for this policy to be fully effective both its contents and subsequent policies must be continually reviewed and monitored to ensure its full integration into our day-to-day business. All staff take part in policy review to support our business drive and direction and to engage with and promote our values.

Data

As a training provider we record data for gender, ethnicity, disability and age. This information is in our Data Protection and GDPR Policy 12.

Monitoring and feedback

Apprentice data will be used to enable us to monitor recruitment, retention, achievement and progression data to assist us in identifying any imbalances or positive trends and make any relevant improvements. Feedback on equality, diversity and

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inclusion matters through the learner journey will be actively encouraged through the use of learner forums, annual survey and through feedback at apprentice reviews.

Equal Opportunities Action Plan

Improvement	By When	Progress
Annual review of policy	February 2021	Complete
OTLA focus on British Values and Prevent Duty	March 2021	Complete
Staff CPD on British Values and Prevent Duty	May 2021	Complete
Promote Disability Friendly logo on relevant materials	As required	Ongoing

Documents and Policies associated with this Policy.

Document	Number
IQA Policy	ITEC.Policy.02
Safeguarding Policy	ITEC Policy.08
Data and Information Policy (GDPR)	ITEC.Policy.12
Prevent Policy	ITEC.Policy.15
Prevent Action Plan	Prevent 15a
Bullying and Harassment Policy	ITEC.Policy.17
Employer Health and Safety Assessment	DOC.HS.01
Work Placement Guidance for Employers	DOC.HS.02
Learner Handbook	DOC.LJ.01