

# Equality, Diversity and Inclusion Policy

## 1. Policy Statement

Skill Step Group Ltd is committed to providing equality of opportunity and freedom from unlawful discrimination on the grounds of age, sex, sexual orientation, disability, race (including colour, nationality, ethnic origin), religion or beliefs, gender reassignment, pregnancy and maternity status, marital or civil partnership status.

We value others for their contribution, irrespective of personal differences, and strive to provide a supportive and inclusive learning and working environment where everyone feels that they are valued and can work to achieve their potential.

As an organisation, we oppose and avoid all forms of unlawful discrimination and are committed to creating and promoting an environment that is free of bullying, harassment, victimisation and unlawful discrimination, promotes dignity and respect for all, with individual differences and contributions being recognised and valued.

No applicant for a programme with Skill Step Group – or any customer, client or member of staff – shall knowingly receive less favourable treatment on these grounds, nor will any other condition or requirement that cannot be justified disadvantage them.

Through our policy, we aim to support our staff, learners, and others we work with to continually reappraise its methods, and to support equality, diversity and inclusion to ensure continued success of the sector. We will:

- actively oppose all forms of discrimination and unfair or discriminatory practice value and harness the diversity of our staff, partners, learners, employers, suppliers, partner organisations and local communities

- create an environment within which all individuals are treated with fairness and respect, and expect everyone associated with Skill Step Group to embrace respect
- tackle prejudice and promote understanding between different groups of people to create a harmonious and respectful workplace and learning environment
- take proportionate positive action to encourage participation of under-represented groups in our workplace and across all of the services we provide
- embed the concept of British Values within our equality and diversity practices
- fully implement the Equality Act 2010 and associated legislation to eliminate discrimination, harassment and victimisation.

This policy applies in our employment practices and across all areas of our services.

While the overall responsibility for achieving, promoting and providing equality of opportunity rests with Skill Step Group all Skill Step Group partner organisations, suppliers, learners and their employers are required to conduct themselves in a way that respects, supports and acts in accordance with our Equality and Diversity Policy at all times.

Skill Step Group's Managing Director will establish Equality & Diversity Objectives and Impact Measures (EDIMs) on an annual basis, and regularly review progress against these to continually improve our performance in this area.

## 2. Introduction

This policy and associated procedures and guidance is for all Skill Step Group staff, partners, learners and employers to help everyone to understand their responsibilities in supporting Skill Step Group's commitment to equality, diversity and inclusion. It outlines what we mean by equality, diversity and inclusion, the

relevant law and associated codes of practice that we expect people to respect and abide by, and how we as an organisation do the same.

## 2.1 Scope

This policy and procedures is applicable to Skill Step Group's Directors, all staff, applicants, learners, employers, volunteers, workers supplied by agencies, contractors, other support workers and assistants accompanying apprentices, learners, customers, visitors and any other partner organisations or procured bodies. It applies to all processes relating to employment, education and training and interactions with staff, learners, apprentices, employers and partners.

## 3. Implementation

This policy makes clear Skill Step Group's position on equality diversity and inclusion, and establishes the key principles, structures and monitoring arrangements that we use.

All Directors, staff, applicants, learners, employers, volunteers, workers supplied by agencies, contractors, other support workers and assistants accompanying apprentices, visitors and customers and any other partner organisations or procured bodies are responsible for the promotion and advancement of this policy. Behaviour, actions and words that transgress this policy will not be tolerated and will be dealt with in accordance with the relevant Skill Step Group policy or procedure.

### 3.1 Communication

All employees, irrespective of their job or seniority, will be given guidance and instruction as part of their initial induction and though subsequent mandatory training to ensure that they understand their responsibility and role in promoting equality of opportunity, avoiding discrimination and valuing diversity.

Learners will be advised about this policy as part of their induction and enrolment procedures, and this policy will be available for reference on Skill Step Group intranet and company website.

### 3.2 Statutory Responsibilities

Skill Step Group welcomes and fully accepts its responsibilities and adheres to UK equality legislation relevant to the organisation and its operations in England. Key to these is the Equality Act 2010 and associated codes of practice for further education applicable to training providers.

The Equality Act 2010 which forms the basis of this policy, uses the term 'protected characteristics' to refer to aspects of a person's identity that are explicitly protected from unlawful discrimination. These are:

- Age
- Gender reassignment
- Religion and belief
- Sexual orientation
- Pregnancy and maternity
- Disability
- Race
- Sex (gender)
- Marriage and civil partnership

Please note that whilst all nine characteristics apply in the employment duties of the act, the characteristic of marriage and civil partnership is not included in the education duties of the act.

### 3.3 Skill Step Group as an Employer

Equality in the workplace means:

- having trained staff who understand equality issues (and proactively promote these)
- having staff who support Skill Step Group's vision and values
- having a community of staff that reflects the diversity of modern British society (and pro-actively promotes it)
- having staff that will provide services fairly and effectively (and pro-actively promote them).
- Skill Step Group has clear procedures regarding recruitment, development, and management of staff, which underpin our approach to equality, diversity and inclusion for our employees.

We will:

- operate a fair and open recruitment policy
- make decisions concerning recruitment, selection, training and development, and career progression of our employees in a fair and unbiased manner, solely based on objective criteria, individual merit and ability
- monitor wherever practicable, the protected characteristics of job applicants and employees in accordance the Data Protection Act 2018 and use this information to monitor the effectiveness of our policies
- take proportionate positive action to encourage participation of under-represented groups in our training programmes, workplace and internal apprenticeship programmes
- take positive action to attract under-represented groups through targeted marketing activity
- make reasonable adjustments\* to meet the needs of disabled and non-disabled job applicants and employees
- interview all disabled applicants who meet the minimum criteria for a job vacancy and consider them on their abilities
- discuss with disabled employees regularly what we can do to make sure they develop and use their abilities

- make every effort when employees become disabled to make sure they stay in employment
- facilitate special training or support to enable employees to progress within the company
- provide flexible working arrangements for staff
- monitor provision of training and development opportunities for staff to ensure equal access
- rigorously address concerns about bullying, harassment or victimisation through our policies
- ensure that terms and conditions of employment, procedures for redundancy and dismissal are free from all forms of direct or indirect discrimination.

\* Skill Step Group employees can make requests for reasonable adjustments via their line manager.

### 3.4 Skill Step Group as a provider

Skill Step Group delivers training to a wide variety of learners and employers in England. To ensure equality of opportunity we will:

- ensure information about our programmes is accessible and written in 'plain English' as well as provide information in different formats where required
- ensure our application and assessment processes are clearly communicated and fair, including for learners with learning difficulties so we do not create unnecessary barriers to participation
- provide a safe and welcoming environment in our training centre
- assess the individual needs of learners to understand any support requirements for additional learning needs, making reasonable adjustments while remaining compliant with health and safety requirements, for learners with disabilities, to participate and achieve their goals

- embed equality, diversity and inclusion issues into Skill Step Group's teaching and learning curriculum to raise awareness and promote good citizenship and British Values
- challenge discrimination and negative behaviour and empower learners to do so
- gather, process and analyse equality data across our training provision, make required regulatory returns to the ESFA (where applicable), and take positive action to address gaps in achievement between different groups to achieve parity of outcomes for all
- celebrate success to promote equality and diversity and encourage others to achieve
- consult regularly about equality and diversity with our staff, learners employers and external organisations to inform continuous improvement
- ensure that Skill Step Group has a current equality and diversity policy in place that includes appropriate channels and procedures for people who may need to raise complaints or grievances.

Skill Step Group reserves the right to withdraw its training services from any learners or employer if they behave in a discriminatory, disruptive or abusive manner to any member of Skill Step Group staff, partner staff member, other learners or other person.

## 4. Complaints

If an individual believes that they have suffered any type of discrimination, harassment or victimisation as, or by, a Skill Step Group employee, we will take this very seriously.

We have the following procedures in place to deal with complaints:

- learners and Employers can raise a complaint formally through Skill Step Group's Learner and Employer Complaints Policy and Procedure

- Employees can raise complaints formally through Skill Step Group's Discipline and Grievance procedure.

Skill Step Group will investigate all complaints thoroughly and deal with them appropriately.

## 5. Hate Crime

Skill Step Group will not tolerate sexist, racist, disablist, homophobic, bi-phobic or transphobic hate incidents. This includes racial or religious hatred, encouraging racial hatred and any form of violence or encouraging violence.

If you are a victim or witness of hate crime, we encourage you to report the incident, wherever it occurred, to a person you trust, such as your tutor or mentor. Skill Step Group will provide help and advice and support. You can report hate crime incidents by phone, email or in person.

## 6. Language

Skill Step Group recognises that prejudice and discrimination may arise or be reinforced by a person's use of language, which may not be neutral or free from personal bias. This includes when writing, speaking, published materials, emails, and social media. Rather than tell people what language they can and can't use, we ask all employees, learners, subcontractors and employers to conduct themselves in a professional manner, use good judgement and be aware of common inappropriate or offensives references in relation to the protected characteristics outlined in section 5 of this policy, and the significant effect that using them can have on people.

## 7. Advertising and Information

Skill Step Group is committed to equality and we will work to make sure that the language and images used in all publications and electronic media is inclusive and does not discriminate.



## 8. Roles and Responsibilities

All staff have a responsibility to uphold the commitments in this policy. Specific responsibilities are as follows:

### 8.1 Skill Step Group's Managing Director is responsible for:

- implementing this policy throughout the business
- ensuring that sufficient resources are available to facilitate the effective implementation and maintenance of this policy
- incorporating the promotion of equality into Skill Step Group's business planning
- establishing Skill Step Group's annual Equality and Diversity objectives and Impact Measures (EDIMs).
- ensuring all Skill Step Group's processes and practices (including recruitment, development and other personnel practices) promote fair and equal treatment
- delivering Skill Step Group's equality objectives
- providing advice and support on equality and diversity issues to their managers and staff
- undertaking monitoring activities to ensure the effective implementation of the policy.

### 8.2 All employees are responsible for:

- complying with this policy in all their dealings with learners and their employers, partners, external organisations, local communities, and with each other.

## 9. Monitoring & Review

Skill Step Group 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.

- Skill Step Group routinely collects and analyses information on employees, 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.
- Skill Step Group will monitor employee 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.
- The Managing Director reviews progress against Skill Step Group's agreed EDIM objectives on a quarterly basis.

Skill Step Group will review this policy on an annual basis to ensure that all updates to legislation are reflected, and emerging best practice adopted.

## Annex A: Legislation and Definitions

### 1. Definitions of Equality, Diversity and Inclusion

**1.1 Equality** is not about treating everyone the same. It is about treating people fairly, and a recognition that some groups and individuals have particular and specific needs that need to be met if they are to enjoy equal access during their employment and education.

At Skill Step Group, we recognise that some people who work and study with us may need some reasonable adjustments and additional support to ensure equality of opportunity or access if they come from a position of persistent and long-standing disadvantage.

**1.2 Diversity** means recognising that individual and professional differences are a natural part of society and can often create an opportunity for those who recognise them. Valuing diversity involves an acknowledgement of the benefits and intrinsic worth that can be derived from these differences and seeing this as a strength.

At Skill Step Group we aim to celebrate and value these differences. We seek to promote greater mutual understanding between groups and individuals who reflect these differences as way to make valuable use of the talents and experiences they bring to Skill Step Group. We actively work to encourage discussion and understanding of the British Values in our training to further reinforce the value of diversity.

**1.3 Inclusion** can be defined as the complete acceptance and integration of learners and staff regardless of their diverse backgrounds to create a culture and sense of belonging, engagement and participation across Skill Step Group

It is Skill Step Group's ethos that our working environment should be open, inclusive and respectful to all.

## 2. Relevant Legislation and Codes of Practice

Skill Step Group welcomes and fully accepts its responsibilities and will adhere to all relevant UK equality legislation including, but not limited to:

- Equality Act 2010
- Rehabilitation of Offenders Act 1974
- Protection from Harassment Act 1997
- Human Rights Act 1998
- Sex Discrimination (Gender Reassignment) Regulations 1999
- Racial and Religious Hatred Act 2006
- Data Protection Act 2018 (including the General Data Protection Regulations)
- relevant Codes of Practice issued by the Equality & Human Rights Commission
- any amendments to the above legislation.

### 2.1 British Values in Education

The Ofsted definition of British Values in education is:

- democracy
- the rule of law
- individual liberty
- mutual respect for and tolerance of those with different faiths and beliefs and for those without faith.

### 2.2 Types of Discrimination under The Equality Act 2010

The legal definitions vary but, broadly speaking, discrimination is either direct or indirect. The Equality Act 2010 recognises the following types of discrimination:

- direct discrimination, including perception and associative discrimination
- indirect discrimination
- harassment
- victimisation
- discrimination arising from a disability
- failure to make reasonable adjustments.

**2.2.1 Direct Discrimination** is when a person is treated less favourably than others would be treated in the same circumstances because they have a protected characteristic.

**2.2.2 Discrimination by Association (Associative)** is direct discrimination against someone because they associate with another person who has a protected characteristic. For example, disability discrimination against someone who is a carer of a disabled person.

**2.2.3 Discrimination by Perception** is direct discrimination against someone because it is believed that they have a particular protected characteristic. It applies even if the person does not actually have that characteristic, for example, discrimination against someone because they are thought to be gay but are not.

**2.2.4 Indirect Discrimination** is when applying a condition or practice puts someone from a group of people with a protected characteristic at a particular disadvantage. Indirect discrimination can only be justified in exceptional circumstances if it can be shown that the action was reasonable in managing the business or organisation, that is, it is 'a proportionate means of achieving a legitimate aim'.

**2.2.5 Discrimination arising from Disability/Failure to make reasonable adjustments:**

Discrimination occurs when an employer or organisation fails to:

- take reasonable steps to avoid a provision, criterion or practice that puts a disabled person at a substantial disadvantage compared to people who are not disabled; this includes formal and informal rules, practices, arrangements or qualification including one-off decisions and actions
- remove or alter a physical feature or provide a reasonable means of avoiding a feature e.g. building design, access, fixture/fitting, furniture or equipment where it puts a disabled person at a substantial disadvantage compared to people who are not disabled
- provide auxiliary aids or services where this is the only thing that would put the disabled person at a substantial disadvantage
- provide information in an accessible format.

### 3. Harassment

Harassment can be defined as being ‘unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating an individual’s dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual’. Harassment applies to all protected characteristics except for pregnancy and maternity and marriage and civil partnership.

Individuals can complain about behaviour that they find offensive, even if it is not directed at them, and they do not have to have the relevant characteristic themselves.

Individuals are also protected from harassment by association or because of a perceived protected characteristic.

### 4. Victimisation

Victimisation is where one person treats another less favourably because he or she has asserted their legal rights in line with the Equality Act (2010) or helped someone else to do so.

This includes making a complaint, taking legal action, providing evidence related to proceedings or claiming that discrimination has taken place. Because every situation is different, the law states that there is no legal requirement to compare treatment of a complainant with that of a person who has not made or supported a complaint. Victimisation may take place if, for example, a learner claims they have encountered racism from another employee in their place of work or within their training centre, and as a result either the learner or the employee is ignored by other staff members or apprentices.

An individual is not protected from victimisation if they have maliciously made or supported an untrue complaint.

## 5. Genuine Occupational Requirements

Under current legislation, any job may be restricted to a particular characteristic if the characteristic is a 'genuine occupational requirement' (GOR) for the job, or for the situation within which it is carried out. (For example, a religious organisation could request that a job holder is a practising member of their faith.)

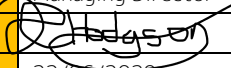
## 6. Positive Action

Where members of a protected group are under-represented, action can be taken to encourage people belonging to that group to take advantage of opportunities for training or work experience or encourage them to apply for a particular job.

Revision Status

Revision	Date	Amendment	Content Owner	Mandated By
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2.0	14/06/21	Annual Review- minor changes to reflect structure changes	H Kirkham	K Hodgson
3.0	10/06/22	Annual Review- minor changes to reflect new services covered within the scope of the Policy	H Kirkham	K Hodgson
4.0	12/06/23	Annual Review- minor changes to reflect structure changes	K Hodgson	K Hodgson

Approval

Approved by:	Katie Hodgson
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Signature:	
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