



The Development Manager Ltd (TDM) takes pride in recognising and celebrating the benefits of having a diverse community of staff, learners and stakeholders, who value one and other and the different contributions they can make to the organisation and the communities and regions we work for.

TDM is committed to being an equal opportunities employer and training provider, providing equality of opportunity for all staff and promoting equality, diversity and inclusion amongst all employees, learners, employers and stakeholders.

In the provision of equal opportunities, TDM recognises and accepts its responsibilities under the legal requirements of the Equality Act 2010.

TDM seeks to create an open, fair, respectful and supportive environment that is free from discrimination, and which encourages all staff, learners, employers and stakeholders to fully embrace diversity and inclusion, challenge discrimination and foster good relationships.

TDM aims to provide an environment that values individuals regardless of:

- age
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race (including colour, nationality, and ethnic or national origin)
- religion or belief
- sex
- sexual orientation

This policy should be read alongside the other TDM policies and with national legislation and guidance.

## Contents

|                                                                      |    |
|----------------------------------------------------------------------|----|
| Scope                                                                | 3  |
| Responsibilities                                                     | 3  |
| TDM Equality and Diversity Objectives                                | 4  |
| Monitoring Equality and Diversity                                    | 4  |
| Staff Training                                                       | 5  |
| Recruitment and DBS                                                  | 5  |
| The Legal Framework                                                  | 6  |
| Protected Characteristics                                            | 6  |
| Discrimination                                                       | 7  |
| Disability                                                           | 8  |
| TDM's Provision and Equality, Diversity and Inclusion                | 8  |
| TDM Equality, Diversity and Inclusion Policy Monitoring and Review   | 10 |
| Document Management                                                  | 10 |
| Appendix 1: Annual Breakdown of Staff by Key Group:                  | 13 |
| Appendix 2: Equality, Diversity and Inclusion Responsibilities Chart | 13 |

## Scope

This policy applies to all staff, learners, employers and stakeholders.

TDM will work to ensure that all learners, employees, consultants, visitors and stakeholders, as well as those who seek to apply to work or study with us or who have previously worked or studied with us, are treated fairly and are not subjected to unlawful discrimination.

## Responsibilities

### Governors and Directors

Oversee policy implementation, review, offer challenge and support.

### Governance and Reporting

#### Board Oversight Will Include:

- Quarterly Inclusion Report covering:
  - Participation and attendance patterns across groups
  - Outcomes by demographic group (EDIMS)
  - Retention, achievement, progression gaps
  - Impact of interventions
  - Learner voice themes
  - Safeguarding themes linked to vulnerable groups
  - SEND and high needs support summary
- Annual Inclusion Self-Assessment
- Risks and mitigations in the organisational risk register
- Policy and strategy review (annual)

#### Governor Responsibilities:

- Understand statutory duties and the new Ofsted expectations.
- Offer support and challenge to ensure learners' needs are met.
- Monitor progress against inclusion KPIs.
- Ensure leaders' workload is manageable while delivering this policy.

### Management Team and Equality, Diversity and Inclusion (EDI) Champions

The Management Team includes two Equality, Diversity and Inclusion Champions (the HR and L&D Manager and the Candidate Engagement Manager) who take the lead on equality, diversity and inclusion issues. Appendix 2 showcases the equality, diversity and inclusion responsibilities for different team members.

The Management Team and the EDI Champions will ensure:

- All staff, learners, employers and stakeholders are aware of the Equality, Diversity and Inclusion Policy and the Equality Act 2010, and that they support, implement and comply with it and with the relevant legal requirements.
- The implementation of equal opportunities is adequately monitored throughout our provision with staff, learners, employers and stakeholders.

- Staff, learners, employers and stakeholders are provided with opportunities to discuss and deal with equality and diversity issues.
- Staff, learners, employers and stakeholder behaviour and/or actions do not amount to discrimination or harassment in any way and that all are expected to promote a culture free of discrimination, prejudice and all forms of harassment and bullying, including sexual harassment.
- All staff should understand they, as well as their employer, can be held liable for acts of bullying, harassment, victimisation and unlawful discrimination, in the course of their employment, against fellow employees, customers, suppliers and the public.
- Any incidents of discrimination, harassment or bullying will be investigated and disciplinary action taken if needed (refer to Anti-Bullying and Harassment, Sexual Harassment, Disciplinary and Grievance Policies).
- Processes and procedures ensure fairness in all things for all.
- Teaching and learning are provided, free from discrimination, such as to cover:
  - Inclusive teaching
  - Supporting SEND and neurodivergent learners
  - Managing workplace differences and sensitive topics
  - Trauma informed practice
  - Mental health awareness
  - Embedding British values and diversity respectfully
- The policy and systems are monitored and updated according to current legislation.

### **Staff, Learners and Stakeholders**

Staff, learners and stakeholders are encouraged to:

- Have a zero tolerance toward negative behaviours regarding equality, diversity and inclusion, considerably challenging such behaviours where appropriate.
- Promote equality, diversity and inclusion in the workplace.
- Identify and report discriminatory practices to the EDI Champions and/or the Managing Director.

### **TDM Equality and Diversity Objectives**

- Make a copy of the policy available to current staff and issue new staff with a copy of the policy in their induction.
- Include Equality of Opportunity in learner induction and make learners aware of TDM's policy.
- Ensure the EDI Champions develop and monitor the Equality and Diversity policy and practices at TDM.
- All staff (regardless of status) will, through their responsibilities, be proactive in promoting diversity, inclusion and equal opportunities, and in tackling discrimination.

### **Monitoring Equality and Diversity**

Amongst staff:

- The HR and L&D Manager will conduct an annual review of staff by key group: the proportion who are female, disabled, BAME, etc. (See Appendix 1)
- TDM welcomes applications from all backgrounds and are committed to equality of opportunity. Where evidence reasonably suggests under-representation or disadvantage affecting individuals who share a protected characteristic, proportionate positive action measures may be considered in accordance with the Equality Act 2010.

Amongst learners:

- Through the Self-Assessment Report data, leaders and managers have information on learners' gender, disability, ethnicity. Reports are sent to governors and the Management Team on a quarterly basis, ensuring improvement actions are in motion to promote equality and diversity amongst our employer groups and referral agencies and to actively seek to engage with underrepresented groups in the community.

**Accessibility is provided for all, through:**

- A review programme for the improvement of physical access to buildings. The EDI Champions will ensure that reasonable adjustments are made in the workplace to make this happen.
- Providing equipment and support to enhance learning for those who require it (including online accessibility). See the Access and Reasonable Adjustment Policy for more information on this with reference to learners.
- Developing a marketing and publicity strategy with a clear equality and diversity focus.
- Monitoring learner recruitment, retention, and timely success. This will be done via the Data Team, who will produce an annual report on all learners from diverse backgrounds and the progress they have made from their starting point.
- Surveys and feedback sought from customers (internal and external). This will be done via the Quality Team, who will undertake an annual poll on equality, diversity and inclusion with learners and employers, asking questions such as, 'do you think we are an inclusive employer?' 'Do you have any recommendations for us to become more inclusive?' etc.
- Supporting implementation of equal opportunities elements in complaints, grievance and disciplinary policies and procedures.
- Facilitating the delivery of equality, diversity and inclusion elements in staff CPD.
- Provision of information, advice and guidance.
- Recognition of prior learning, experience and achievement.
- A variety of courses and modes of study, including blended learning and other differing learning processes.
- A supportive environment that offers flexible and fair staff, learner, employer and stakeholder involvement strategies.
- Accessing available funding.

## **Staff Training**

- The EDI champions will receive training from equality, diversity and inclusion seminars or literature, from time to time to keep up to date with legislation and current practice in the sector.
- All company staff will undertake regular equality, diversity and inclusion training.
- All company staff have regular weekly team meetings to discuss work and issues that concern them, thus ensuring the sharing of good practice and an open platform to promote and discuss equality, diversity and inclusion topics.
- The leadership and management team organise standardisation and training for staff on a regular basis to cover the national educational priorities, of which equality, diversity and inclusion is one. Staff receive training on how they can use the principles of equality, diversity and inclusivity in their professional practice.

## **Recruitment and DBS**

- In line with our Recruitment Policy, TDM actively seeks to recruit with the right mix of talent, skills and potential, promoting equality for all, and welcomes applications from a wide range of candidates.
- Candidates are selected for interview based on their skills, qualifications, experience and commitment to the values and purposes of the organisation.
- As an organisation using the Disclosure and Barring Service (DBS) Disclosure Service to assess applicants' suitability for positions of trust, TDM undertakes to comply fully with the DBS Code of Practice and to treat all applicants for positions fairly. It undertakes not to discriminate unfairly against any subject of disclosure on the basis of conviction or other information revealed.
- All roles at TDM require a DBS check. The level of the check required (and any barred list checks) is dependent upon the amount of contact the role will have with learners. Any DBS check requested will be both proportionate and relevant to the position concerned. For those positions where a Disclosure is required, all application forms, job adverts and recruitment briefs will contain a statement that a Disclosure will be requested in the event of the individual being offered a position.
- Where a Disclosure is to form part of a recruitment process, TDM encourages all applicants called for interview to provide details of any criminal record at an early stage in the application process. The organisation requests that this information is sent under separate, confidential cover to the recruiter within the organisation and will only be seen by those who need to see it as part of a recruitment process.
- Unless the nature of the position allows TDM to ask questions about a candidate's entire criminal record, we only ask about "unspent" convictions as defined in the Rehabilitation of Offenders Act 1974.
- At least one member of any recruitment panel will have completed safer recruitment training.
- At interview, or in separate discussion, TDM will ensure that an open and measured discussion takes place about any offences or other matter that might be relevant to the position. Failure to reveal information that is relevant to the position sought could lead to withdrawal of an offer of employment or voluntary work.
- Any matter revealed in a disclosure will be discussed with the person seeking a position before withdrawing a conditional offer of employment.
- Having a criminal record will not necessarily bar a candidate from working with us. It will depend on the nature of the position and the circumstances and background of the offences.

## **The Legal Framework**

- The following legislation and documentation apply to all:
- The Equality Act 2010
- Employment Statutory Code of Practice

## **Protected Characteristics**

There are nine protected characteristics in the Equality Act. Discrimination which happens because of one or more of these characteristics is unlawful under the Act. The characteristics that are protected by the Equality Act 2010 are:

- age
- disability
- gender reassignment
- marriage or civil partnership (in employment only)
- pregnancy and maternity
- race
- religion or belief

- sex
- sexual orientation

## Discrimination

The Equality Act outlines the main forms of unlawful discrimination: direct discrimination, indirect discrimination, victimisation and harassment.

- Direct discrimination:
  - Direct discrimination occurs when a person treats another less favourably than they treat or would treat others because of a protected characteristic. Direct discrimination is generally unlawful. However, it may be lawful in the following circumstances:
    - In relation to the protected characteristic of disability, where a disabled person is treated more favourably than a non-disabled person.
    - Where the Act provides an express exception that permits directly discriminatory treatment that would otherwise be unlawful.
    - In relation to the protected characteristic of age where discrimination which can be objectively justified will not be unlawful.
- Indirect discrimination:
  - Indirect discrimination may occur if we applied an apparently neutral provision, criterion or practice which puts or would put a person/s sharing a protected characteristic at a particular disadvantage when compared with a person/s that do not have that characteristic.
- Discrimination by association:
  - Is where a person is treated less favourably because of their association with another person who has a protected characteristic; however, this does not apply to pregnancy or maternity.
- Discrimination by perception:
  - Discrimination by perception happens when a person is discriminated against because they are thought to have a particular protected characteristic when in fact they do not.
- Victimisation:
  - Victimisation occurs when a person is treated badly because they have made or supported a complaint or raised a grievance under the Equality Act; or because they are suspected of doing so. A person is not protected from victimisation if they have maliciously made or supported an untrue complaint.
  - There is no longer a need to compare the treatment of a complainant with that of a person who has not made or supported a complaint under the Act.
- Harassment:
  - Harassment is "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.
  - People will now be able to complain of behaviour that they find offensive even if it is not directed at them, and the complainant need not possess the relevant characteristic themselves.
  - Sexual harassment may amount to both an employment rights matter and a criminal matter, such as in sexual assault allegations. In addition, harassment under the Protection from

Harassment Act 1997 – which is not limited to circumstances where harassment relates to a protected characteristic – is a criminal offence.

## **Disability**

- TDM will make ‘reasonable adjustments’ to help and support any disabled employees and job-applicants with:
  - application forms, e.g. providing forms in Braille, audio formats
  - aptitude tests, e.g. giving extra time to complete the tests
  - dismissal or redundancy
  - disciplinary or grievances
  - interview arrangements, e.g. wheelchair access, communicator support
  - making sure the workplace has the right facilities and equipment for disabled workers or someone offered a job
  - promotion, transfer and training opportunities
  - terms of employment, including pay
  - work-related benefits like access to recreation or refreshment facilities

At TDM we acknowledge the validity of the social model of disability whereby much disability is socially engineered. We intend to ensure all our provision includes provision for disability 'by design', rather than it being considered an 'add on'.

## **TDM’s Provision and Equality, Diversity and Inclusion**

TDM is committed to ensuring that every learner and apprentice belongs, thrives and succeeds, particularly those who are disadvantaged, have SEND or high needs, are care experienced, or face other barriers to learning or wellbeing.

TDM aims to push our curriculum design further to include more cutting-edge themes such as those now shaping the policy for equality, diversity and inclusivity in the workplace. TDM's hyper-personalised approach to coaching aims to put learner needs at its heart so support can be made available as and when needed.

### **Strategic Principles**

#### **A. High Expectations for All**

- We set ambitious expectations for every learner, including those without prior Level 2 English/maths.
- Staff are trained to recognise and challenge low expectations, biases or practice that disadvantage any group.

#### **B. Early and Accurate Identification of Needs**

- All learners complete a structured initial needs and barriers assessment at onboarding.
- Coaches use a standardised “Assess–Plan–Do–Review” cycle (SEND Code of Practice) to monitor needs throughout the programme.

#### **C. Reducing Barriers Quickly and Consistently**

- Reasonable adjustments (e.g., technology support, alternative assessment methods, extended time, scaffolded materials) are put in place promptly.

- TDM collaborates with external specialists where appropriate (e.g., dyslexia assessors, mental health agencies, social services).

#### **D. Learner Voice and Coproduction**

- Learners and apprentices contribute to support planning.
- Support workshops, functional skills, learner feedback opportunities after each course, and learner feedback ahead of EPA all feed into providing a platform for learners to give feedback/discuss curriculum design and support as a whole that TDM can implement.

#### **E. Inclusive Curriculum Design**

- Curriculum is adapted to ensure accessibility without lowering expectations.
- Content includes digital confidence scaffolding, employability behaviours, and “Life in Modern Britain”.

#### **Operational Delivery Model**

##### ***Identifying and Assessing Needs***

TDM uses a multilayer assessment process:

- Pre-enrolment: barriers to learning and support flags
- Onboarding: diagnostic skills assessments
- Early weeks: coach review + initial targets
- Ongoing: RBSG ratings, SMART evidence tracker, attendance data, wellbeing red flags

##### ***Supporting Disadvantaged Learners***

TDM provides:

- Priority contact and check-ins
- Prompt interventions for attendance or engagement dips
- Enhanced pastoral support
- 1:1 coaching around confidence, organisation, and digital skills
- Targeted English/maths support where required

##### ***Supporting Learners with SEND / High Needs***

TDM ensures:

- A designated SEND Lead oversees provision effectiveness
- The graduated approach is consistently applied
- Coaches receive regular training in inclusive pedagogy
- Reasonable adjustments are recorded, monitored, and reviewed
- Partnerships with local SEND services and specialists
- Consistent monitoring of progress against individual goals

##### ***Supporting Care Experienced and Vulnerable Learners***

- Dedicated point of contact
- Personal support plans
- Collaboration with social workers and external agencies
- Enhanced welfare checks related to attendance dips
- Priority access to wellbeing support

It is the responsibility of the curriculum team leaders to ensure coaches and trainers develop knowledge and understanding on diversity and inclusivity topics, thus empowering them to promote initiatives such as <https://projectinclude.org/> amongst our learners and employers.

In the tech and digital sector, as the engineers of a virtual and connected world, there is a particular need for representation of the diversity of humanity and this is a responsibility shared not only by the TDM coaches but the wider TDM team.

#### Core KPIs for TDM's Provision

- Achievement and retention for SEND, disadvantaged, and other groups
- Gap analysis across EDIMS
- Attendance gaps by demographic group
- Time to intervention (speed of support)
- % of learners with an active support plan
- Completion of reasonable adjustments
- Learner satisfaction themes (segmented by group)

#### Evidence Sources for Ofsted

- Inclusion Strategy & policy
- RBSG data
- SMART evidence tracking (showing progress clarity)
- ILP / Support Plan samples
- EDIMS dashboards
- Wellbeing, attendance and risk logs
- CPD logs for inclusive practice
- Learner voice reports

Updated further Information and legal guidance can be found:

- Equality and Human Rights Commission: <https://www.equalityhumanrights.com/en>
- Equality Advisory and Support: <https://www.disabilityrightsuk.org/guidance-resources>
- Citizens Advice Bureau: <https://www.citizensadvice.org.uk/>

### TDM Equality, Diversity and Inclusion Policy Monitoring and Review

This policy will be reviewed on an annual basis, or through the intervention of newly revised legislation as and when it occurs.

#### Document Management

|                             |                                                    |
|-----------------------------|----------------------------------------------------|
| Document Name and Reference | Equality, Diversity and Inclusion Policy -TDMPP001 |
| Classification              | External                                           |

|                                                                         |                                                                                   |
|-------------------------------------------------------------------------|-----------------------------------------------------------------------------------|
| Policy Ownership                                                        | This policy is owned by all staff at TDM                                          |
| Policy lead originator and point of contact in relation to its content: | Elizabeth Hoyos-Operations Director                                               |
| TDM policy and procedure approval                                       | Elizabeth Hoyos-Operations Director                                               |
| Signature                                                               |  |
| Date                                                                    | 22 <sup>nd</sup> May 2023                                                         |

| Version Control |                  |                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |          |                    |
|-----------------|------------------|----------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|--------------------|
| Issue Date      | Revision Number* | Revision Date* | Revision Changes*                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Initials | Next revision Date |
| 06/07/2009      | 001              |                | Issued                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | EH       | Annually           |
| 21/02/2009      | 011              | 03/03/2020     | Reviewed                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | EH,JJ    | March 2021         |
| 10/05/2021      | 012              | 10/03/2021     | Reviewed                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | EH,JJ    | January 2022       |
| 10/05/2021      | 020              | 10/01/2022     | Reviewed, addition of document control                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | JJ,EH    | January 2023       |
| 10/05/2021      | 021              | 22/05/2023     | Reviewed, additional protected characteristic, information on sexual harassment, and that liability for acts of bullying, harassment, victimisation and unlawful discrimination can be held against the employee as well as the employer have been added. Added 'Recruitment and DBS' section. Removed staff equality and diversity breakdown data table and replaced it with a link. Updated job titles. Added curriculum aims, added project including example. Added 'TDM's provision and equality and diversity section'.                                                                                                                                                                                       | EH, AR   | May 2024           |
| 10/05/2021      | 021              | 15/05/2024     | <ul style="list-style-type: none"> <li>Reviewed</li> <li>Updated 'senior management team' to 'senior leadership team (SLT)'.</li> <li>Updated definition of discrimination by association.</li> <li>Added definition of discrimination by perception.</li> <li>Updated: All company staff will receive as a minimum of once a year in house training from the ED Champions-undertake equality and diversity training once a year.</li> <li>Updated the equality and diversity data of staff members from the May 2024 survey.</li> </ul>                                                                                                                                                                            | AR       | May 2025           |
| 10/05/2021      | 022              | 25/02/2025     | <ul style="list-style-type: none"> <li>Reviewed throughout</li> <li>Updated title of Policy to include 'Inclusion' (and referenced throughout policy)</li> <li>Included reference to sexual harassment and Sexual Harassment Policy</li> <li>Updated 'Senior Management Team' to 'management Team'</li> <li>Updated EDI Champions to HR and L&amp;D Manager and Candidate Engagement Manager</li> <li>Updated staff responsibilities</li> <li>HR &amp; L&amp;D Manager will monitor EDI amongst staff</li> <li>Updated TDM's Curriculum Intent statement</li> <li>Updated TDM's Provision and Equality and Diversity to include reference to our hyper-personalised approach</li> <li>Updated Appendices</li> </ul> | AR       | May 2025           |
| 10/05/2021      | 022              | 08/04/25       | <ul style="list-style-type: none"> <li>Added and updated DBS check to: 'All roles at</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | AR       | April 2026         |

|            |     |          |                                                                                                                                                                                                                                                                                                                                                                                                          |    |            |
|------------|-----|----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|------------|
|            |     |          | <p>TDM require a DBS check. The level of the check required (and any barred list checks) is dependent upon the amount of contact the role will have with learners. Any DBS check requested will be a Disclosure is only requested after a thorough risk assessment has indicated that one is both proportionate and relevant to the position concerned.'</p> <p>Updated annual breakdown of staff</p>    |    |            |
| 10/05/2021 | 023 | 05/02/26 | <p>Added 'Governance and Reporting' section</p> <p>Updated 'TDM's Provision and Equality, Diversity and Inclusion' section to include details of TDM's Inclusion Strategy</p> <p>Add a list of examples of the teaching and learning that should be provided to TDM staff</p>                                                                                                                            | AR | April 2026 |
| 10/05/2021 | 024 | 08/05/26 | <p>Updated EDI Champion responsibilities.</p> <p>Changed EDI training to 'regular'</p> <p>Updated the training for those involved in the recruitment process to 'At least one member of any recruitment panel will have completed safer recruitment training.'</p> <p>Updated 'Monitoring Equality and Diversity amongst Staff' second bullet point.</p> <p>Updated 'Learner Voice and Coproduction'</p> | AR | April 2027 |
| 10/05/2021 | 024 | 19/05/26 | <p>Updated link in Appendix 1 to the 2026 data.</p>                                                                                                                                                                                                                                                                                                                                                      | AR | April 2027 |

\*Significant changes or reviewed

## Appendix 1: Annual Breakdown of Staff by Key Group:

[2026 Annual Breakdown of Staff Equality and Diversity Data by Key Group.docx](#)

## Appendix 2: Equality, Diversity and Inclusion Responsibilities Chart

