

Public

Equality, Diversity and Inclusion Policy

Applicability Statement

This policy applies to all divisions, subsidiaries, departments, and associated organisations.

It is binding on all employees, contractors, and stakeholders engaged in activities on behalf of the organisation, regardless of business unit or location. All members are expected to adhere to the principles, standards, and requirements set out herein.

Purpose

The purpose of this policy is to ensure a working environment that is free from discrimination and harassment as well as promoting equality, diversity and inclusion.

The business is committed to fostering an inclusive culture where individuals from all backgrounds are valued equally, enabling better outcomes for employees, stakeholders, and the organisation as a whole.

This includes ensuring fair access, participation, and outcomes for all learners and participants across all programmes and services.

This policy also ensures compliance with relevant legislation and supports continuous improvement as social attitudes and legal frameworks evolve.

Introduction

The business values and actively strives to maintain a diverse and inclusive workforce. An inclusive working environment, where differences are recognised and respected, contributes to improved performance, engagement, and wellbeing.

We regularly engage with staff and external partners to better understand how to improve inclusion and respond to the needs of our workforce.

Scope

This policy applies to all aspects of employment and engagement, including:

- Recruitment and selection processes
- Training and development



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- Promotion and career progression
- Terms and conditions of employment
- Access to benefits and facilities
- Grievance and disciplinary procedures
- Redundancy selection
- Design, delivery, and assessment of education and training programmes
- Engagement with learners, apprentices, employers, subcontractors, and stakeholders

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1. Commitment to Equality, Diversity and Inclusion

The business is committed to promoting the principles of equality, diversity and inclusion in all activities.

Everyone acting on behalf of the business is required to adhere to this policy when carrying out their duties or representing the organisation in any capacity.

It is expected that all employees will commit to completing all training and educational activities designed to promote and improve understanding of the key principles set out in this policy.

We are committed to ensuring that all learners, apprentices, and participants experience an inclusive environment, free from discrimination, where they are supported to achieve their full potential.

2. Unlawful Discrimination

Unlawful discrimination of any kind will not be tolerated. The business will take all necessary action to prevent its occurrence.

We aim to ensure that no employee, worker, or job applicant, learner, apprentice, or participant is subject to unlawful discrimination, either directly or indirectly, on the grounds of:

- Gender
- Gender reassignment
- Race (including colour, nationality, caste, and ethnic origin)
- Disability
- Sexual orientation
- Marital status
- Pregnancy or maternity
- Age
- Religion or belief
- Trade union membership

This commitment applies across all employment, and education and training delivery practices outlined in the Scope section.

3. Inclusion

All individuals must understand how this policy applies to them and must adhere to the following expectations when carrying out their duties:

- Present themselves professionally and support colleagues to create an engaged, welcoming, and inclusive workplace
- Understand Equality, Diversity and Inclusion responsibilities within their role
- Be open to differences and challenge personal assumptions where appropriate

- Recognise the negative impact discrimination can have on colleagues, clients, and the organisation
- Challenge non-inclusive behaviour through appropriate channels
- Ensure inclusive practice when working with clients and stakeholders
- Ensure inclusive practice when working with learners, apprentices, employers, and stakeholders

4. Responsibilities of Managers

Managers have additional responsibilities to:

- Promote inclusive values within their teams
- Challenge inappropriate behaviour promptly and effectively
- Take appropriate action where there is a breach of this policy, including providing relevant training
- Act as role models, demonstrating inclusive behaviours
- Ensure inclusion is embedded throughout the employee lifecycle, from induction to exit
- Ensure all decisions are based on merit and that opportunities for development are accessible to all
- Ensure inclusive practices are embedded within the delivery of learning programmes and interactions with learners and employers

5. Career Development

Recruitment and promotion decisions will be based solely on merit.

All individuals will have equal access to training and career development opportunities appropriate to their experience and abilities, including ensuring learners and participants have equitable access to progression opportunities and support.

Where appropriate and permitted by legislation, positive action may be taken to support under-represented groups through targeted training and development opportunities.

6. Learners, Apprentices and Participants

The business is committed to ensuring that all learners, apprentices, and participants:

- Are treated fairly and with respect
- Have equitable access to learning, assessment, and support
- Are not subject to discrimination, harassment, or victimisation
- Receive appropriate support to achieve and progress

Any concerns relating to equality, diversity, or inclusion experienced by learners should be raised through appropriate procedures, including complaints or safeguarding processes.

7. Employers and Stakeholders

The business will promote equality, diversity and inclusion in all engagement with employers, partners, and stakeholders.

We will work collaboratively to ensure that inclusive practices are embedded within workplaces, particularly in relation to apprenticeships and work-based learning.

Employers and stakeholders are expected to uphold inclusive values when working with our learners and staff.

8. Subcontractors and Partners

All subcontractors, delivery partners, and third-party providers must adhere to the principles of this Equality, Diversity and Inclusion Policy.

This includes:

- Embedding EDI within teaching, learning, and assessment
- Ensuring fair access, participation, and outcomes for all learners
- Complying with all relevant legislation and funding requirements

The business will monitor subcontractor compliance through quality assurance processes and take appropriate action where standards are not met.

9. Complaints of Discrimination

All individuals are responsible for promoting and upholding this policy.

Behaviour, actions, or language that breach this policy will not be tolerated and may be considered discriminatory.

All complaints of discrimination will be treated seriously and appropriate action will be taken.

If an individual believes they have been discriminated against, they should raise the matter as soon as possible with their manager or another senior manager, using the Grievance Procedure where applicable.

Where the Grievance Procedure does not apply, concerns should be raised directly with a senior manager.

10. Investigation Process

10.1 Reporting and Confidentiality

All allegations will be treated confidentially and investigated thoroughly.

Individuals raising concerns will be protected from victimisation, harassment, or less favourable treatment. Any such behaviour will be addressed through appropriate procedures.

10.2 Investigating Allegations

If an individual is accused of unlawful discrimination:

- A full investigation will be conducted
- They will be given the opportunity to respond and provide an explanation

If an allegation is found to be:

- False or malicious – the complainant may be subject to disciplinary action
- Substantiated – the individual responsible may face disciplinary action, up to and including dismissal for gross misconduct

11. Monitoring

The business may carry out monitoring activities to assess the effectiveness of this policy and identify areas for improvement.

12. Review

This policy will be reviewed regularly to ensure it remains aligned with current legislation, best practice, and organisational needs.