

## Equality and Diversity Policy

### Purpose

HTFT Partnership Limited is committed to the elimination of all forms of discrimination. The Company actively promotes equality and social inclusion within all aspects of its dealings with staff and candidates.

### Our aim

To contribute to developing a society with true equality of opportunity, free from discrimination because of race, sex, disability, age, sexual orientation, gender identity, religion or belief, which recognises and celebrates the value of diversity.

### Objectives

1. To ensure we offer equal opportunities for all in accessing and benefiting from our services
2. To promote the importance and value of equal opportunities and diversity in creating fairer, happier communities
3. To ensure everyone involved in delivering or receiving our services knows and understands our equality and diversity aim and objectives
4. To monitor our services against equality and diversity impact measures and take action, where we can, to improve

### Policy details

Responsibility for implementation of this policy rests with the HTFT Partnership Limited. All staff have a responsibility for ensuring that the policy is implemented and monitored and that customers, contracting organisations and stakeholders are aware of the company's commitment to equal opportunities and all procedures for achieving this commitment.

- Every employee / candidate is entitled to a working environment that promotes dignity and respect for all. No form of intimidation, bullying or harassment will be tolerated
- The commitment to equality and diversity in the workplace is good management practice and makes sound business sense
- All staff are encouraged to recognise their own and the company's responsibilities in implementing positive diversity and equality policies, practices and procedures
- Staff and customers are encouraged to identify that diversity and equality go beyond race, disability and gender
- Breaches of our equal opportunity policy will be regarded as misconduct and could lead to disciplinary proceedings
- This policy will be monitored regularly and reviewed annually to ensure that all documentation and procedures remain free from unlawful or discriminatory practices

It is our policy to provide a safe and comfortable environment where staff and customers are free from:

- Discrimination
- Harassment
- Victimisation

We will:

- Ensure that all staff, learners, employers, sub-contractors and service users are aware of their rights and responsibilities under legislation (see **Appendix A**)
- Comply with legislation in promoting equality, and where appropriate go beyond the legal requirements (see **Appendix A**)
- Embed equality and diversity training into our induction for both learners and staff; providing staff with an opportunity to engage in further E&D training if their Annual Personal Development Plans require it
- Promote equality of opportunity by reaching out to disadvantaged groups and working with partners
- Ensure that the service we offer our beneficiaries provides equality of opportunity to succeed and progress in ways that match their abilities and aspirations
- Be an organisation that harnesses the talents of all, and does not tolerate any form of discrimination or harassment
- Publicise our equality commitment to the wider community
- Ensure our workforce is diverse and representative

It is also our policy to ensure that all staff and candidates are recruited and treated fairly and are able to use their talents and abilities to their full potential irrespective of their:

- Gender
- Ethnic or national origin
- Colour
- Disability
- Age
- Marital status
- Parent or non-parent
- Sexual orientation
- Religion
- Race

It is our policy to monitor information to ensure that we as a company we uphold the statements we set out to achieve. The results of the monitoring process are used to improve working practices in line with the policy requirements.

## Implementation for recruiting staff and learners (including apprentices)

When recruiting, supporting and progressing our staff and learners, we use the following tests to ensure that equality and diversity is embedded into our actions:

### Conduct thorough analysis

- Conduct a thorough and objective analysis on the following:
- Job description (to determine the specific behaviours, skills, knowledge and characteristics that are essential for doing the job well)
- Course content and access (to determine suitability of the programme)

### Recruitment advertising

- Our job advertisements don't contain images or descriptions that might alienate potential applicants.

### Make objective assessments

- We use competency based assessment questions to ascertain individuals suitability for role (including Apprenticeships) – ensuring that all individuals have the same opportunity to respond irrespective of background.

### Training

- We embed equality and diversity training into our induction for staff, providing staff with an opportunity to engage in further E&D training if their Annual Personal Development Plans require it
- During recruitment, we have a set list of objective questions that ensure consistency across our selection criteria and ensure that no questions are asked about aspects such as a physical handicap, pregnancy, sexual identity, religious beliefs, world views, age or ethnicity, unless the question is directly related to the job on offer
- Ensure appropriate training, development and support available to those involved in the recruitment and admission activities, and comply with the requirements of this policy.

### Give unbiased feedback

- When rejecting candidates, we give reasons that are based purely on the job requirements.

### Monitor relevant data

- Monitor candidate aspects such as gender, ethnicity and age at each stage of your selection process (for internal recruits and Apprenticeship positions) to check for adverse impact.
- Apply the "four-fifths rule". This states that the success rate for members of any particular group should not be less than 80% of any other group's success rate.

### Check performance

- Conduct validation research to confirm that the people who perform well in your assessments go on to perform well in the role
- Ensure that all learner applicants and enrolled learners are treated fairly, equitably and efficiently, with respect and courtesy, aiming to ensure that the learner experience is positive, irrespective of the outcome.

## Implementation for training learners (including apprentices)

All learners (including Apprentices) are made aware of our Equality and Diversity policy. Specifically, during the on-programme 'training' phase all learners are provided with:

- Clear guidance on how to raise a related issue, and trained in equality and diversity during their induction/onboarding
- Clear entry criteria to each learning programme and Apprenticeship, ensuring a transparent approach to initial and eligibility assessments, and not precluding any individual from joining the apprenticeship programme on the basis of a protected characteristic
- Enrolment processes will capture information relating to SEND so that an Individual Learning Programme (ILP) can be put in place where required and in agreement with the apprentice. This will incorporate any reasonable adjustments and special considerations, ensuring all learners/apprentices have an ILP that meets their learning needs
- The Designated Safeguarding Lead (DSL) will undertake a risk assessment for any apprentice with SEND requirements to ensure they can access a safe place to learn.
- Effective Information, Advice and Guidance (IAG) to all learners (including those on Apprenticeships), ensuring it is presented in a format that is easily understood by all potential apprentices and employers
- Equality and diversity is discussed and monitored as part of apprentice learner reviews
- Monitoring of progress, achievements and destination will include the analysis of data relating to SEND learners with actions planned and implemented to address any impact identified
- All internal and external messages, imagery, graphics and materials are compliant and inclusive to recognise the diverse nature of our apprentices, learners and provision, and promote equality and diversity
- Any reasonable adjustment or special considerations needed for end point assessment will be discussed with the end point organisation
- Courses are provided at various levels, so learners have a choice that is commensurate with their ability, and with delivery to suit their needs (on demand and live)
- Ambition is fostered and progression is encouraged, for both further training and continued employment
- We have a visionary and innovative way of providing appropriate, relevant and innovative learning for all those engaged with HTFT
- Learners are prepared for continued employment, or further progression, with the aim of producing well-rounded individuals who can fit in with and contribute to society

Learners and Apprentice induction provides a general overview of equality and diversity, introducing them to the policy and topic.

### Learners (including Apprentices) responsibilities

- Giving equal consideration to fellow learners and members of staff and recognising that diversity adds to, not detracts from their learning experience
- Observing both content and spirit of HTFT's Equality and Diversity policy
- Respecting personal rights, freedom and integrity of fellow learners and staff, behaving in a way that ensures fellow learners and staff are not isolated or belittled

- Recognising safeguarding issues and that harassment, which includes deliberate or unconscious humiliation, causes offence or distress
- Recognising that consistent teasing, comments about personal characteristics and bullying is a hostile act
- Understanding that anyone who suffers from or witnesses an incident of harassment has a duty to report such behaviour

## Engagement with Employers

- Equality and Diversity and this policy will be discussed with apprentice's managers at the pre sign up phase to promote engagement and ensure that appropriate workplace policy and procedures are in place to protect apprentices.
- The HTFT Safeguarding team support benchmarking best practice against this policy and ensure continuous improvement.
- Working with our employers to create an equal chance of success for all learners

## Monitoring and Participation of Achievement

We are committed to using the views and opinions of our learners and stakeholders to improve our services and welcome feedback/suggestions on better ways to promote equality and diversity on our training programmes.

- We continually track the progress of all learners ensuring that our systems and procedures take into account their needs
- Monitoring apprenticeship recruitment and retention will be analysed and evaluated by demographic breakdown on a monthly basis to consider the parity of starts, outcomes and retention between different groups.
- Monitoring of apprenticeship achievement and success internally and benchmarking against published Qualification Achievement Rates
- Learners are consulted through the learner surveys and learner voice to gain their input and feedback in relation to equality, diversity and inclusion.
- Identifying where there are disparities or under represented groups and determining what strategies we can deploy to close the gap

## Responsibilities, review and communication

We expect all staff, sub-contractors, partners and individuals accessing our services to abide by our policy and will not tolerate any form of discrimination or harassment.

The Senior Management Team for the business area is responsible for ensuring the implementation, monitoring and annual review of our Equality and Diversity in Delivery Policy.

The Policy and Scheme are communicated to staff, beneficiaries and other interested parties in formats appropriate to the various audiences. The Policy is referred to in beneficiary handbooks and shared as part of induction processes.

**Last review date** 21<sup>st</sup> January 2022

**Frequency of review** Every 6 months

**Next review date** 22<sup>nd</sup> July 2022

**Approved by** Clare Finch, Managing Director

**Signature**



## Appendix A – Key Equality and Diversity Legislation

- Equality Act 2010 [http://www.equalities.gov.uk/equality\\_act\\_2010.aspx](http://www.equalities.gov.uk/equality_act_2010.aspx)

### Pre-cursors to Equality Act 2010

#### Gender

- Equal Pay Act 1970 and the Equal Pay for Work of Equal Work Value Amendment 1983
- Sex Discrimination Act 1975 (amended 1986)
- Sex Discrimination (Gender Reassignment) Regulation 1999

#### Race

- Race Relations Act 1976
- Race Relations (Amendment) Act 2000 and 2003

#### Disability

- Disability Discrimination Act 1995 and amended 2005
- Disability Equality Act 2006

#### Religion

- Employment Equality (Religion or Belief) Regulations 2003

#### Sexual Orientation

- Employment Equality (Sexual Orientation) Regulations 2003

#### Age

- Employment Equality (Age) Regulations 2006

#### General related legislation

- Equalities and Human Rights Act 2006
- Employment Act 2002
- The Freedom of Information Act 2000
- The Employment Relations Act 1999
- Public Interest (Disclosure) Act 1998
- The Crime and Disorder Act 1998
- The Human Rights Act 1998
- The Protection From Harassment Act 1997
- The Trade Union and Labour Relations (Consolidation) Act 1992