

1. Introduction

This policy is a high-level overarching policy and is connected to further policies/procedures and guidance as specified in the Associated Policies section.

- A. WBTC are committed to providing equality of opportunity in education, training and employment for its learners, staff, employers and subcontractors. This commitment is shared and acted on by all WBTC staff and is the overall responsibility of the Managing Director and the Board of Directors. The effectiveness of our policy and the importance we place upon it, are central to the 'spirit' of our organisational values. We aim to prepare learners for successful life in modern Britain and promote the fundamental British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different backgrounds, faiths and beliefs. We will provide a safe environment where learners are able to speak out about radicalisation, extremism and harassment.
- B. We are committed to learners knowing how to protect themselves from the risks associated with radicalisation, extremism, forms of abuse, grooming and bullying, including through the use of social media and how well they understand the risks posed by adults.

2. Scope

All aspects of WBTC provision and working partnerships both internal and external, such as learners, employers and subcontractors are covered by this policy.

3. Legislation

The policy reflects national legislation and guidelines on good practice:

- Equality Act 2010
- Human Rights Act 1998

WBTC is committed to fully implementing all current equality legislation. We keep legislation under review to ensure our full compliance.

4. Equality and Diversity Statement

"It is the policy of WBTC to value and encourage the enriching contribution made by all who work and learn here. We value the rights of all individuals who come into contact with WBTC."

"We believe that people from a range of backgrounds and experiences can enhance the working practices of this organisation. All individuals will be treated on the basis of individual merit and without prejudice. We aim to provide a learning and working environment which actively promotes equality of opportunity and freedom from discrimination encompassing the nine protected characteristics."

Protected characteristics:

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

“We will positively strive to remove conditions which place people at a disadvantage and will actively work to prevent prejudice and discrimination. Where reasonably possible, we will focus public funding on people who are disadvantaged and least likely to participate in education and training and work with other partners to widen participation and support learners’ progression to further learning and/or employment relevant to their personal goals and aspirations.”

WBTC expects all Trustees, Directors, employees, learners, employers and stakeholders to implement and uphold this policy.

The 2010 Equality Act also extends some of these protections to characteristics. There are seven different types of discrimination under the new legislation.

These are:

A. Direct Discrimination

Direct Discrimination occurs when someone is treated less favourably than another person because of a protected characteristic they have or are thought to have (see Perceptive Discrimination below), or because they associate with someone who has a protected characteristic (see Associative Discrimination below).

B. Associative Discrimination

This already applies to Race, Religion or Belief and Sexual Orientation. It is now extended to cover Age, Disability, Gender Reassignment and Sex. This is direct discrimination against someone because they associate with another person who possesses a protected characteristic.

C. Perceptive Discrimination

This already applies to Age, Race, Religion or Belief and Sexual Orientation. It is now extended to cover Disability, Gender Reassignment and Sex. This is direct discrimination against an individual because others think they possess a particular protected characteristic. It applies even if the person does not actually possess the characteristic.

D. Indirect Discrimination

This applies to Age, Race, Religion or Belief, Sex, Sexual Orientation, Marriage and Civil Partnership, Disability and Gender Reassignment.

Indirect Discrimination can occur when you have a condition, rule, policy or even a practice in your organisation that applies to everyone but particularly disadvantages people who share a protected characteristic.

E. 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 intimidating, hostile, degrading, humiliating or offensive environment for that individual".

Employees 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. Employees are also protected from harassment because of perception and association.

F. Third Party Harassment

This already applies to Sex. It is now expected to cover Age, Disability, Gender Reassignment, Race, Religion or Belief and Sexual Orientation.

The Equality Act makes you potentially liable for harassment of your employees by people (third parties) who are not employees of your company, such as customers or clients.

G. Victimisation

Victimisation occurs when an employee 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. The Equality Act amends the definition 'victimisation', so that no longer needs to point to a comparator.

5. Implementation and Accountability

The Board of Trustees/Directors is responsible for promoting equal opportunities on behalf of WBTC. They are also responsible for ensuring that effective policies and procedures are in place to ensure the continued improvement of equality, diversity and Inclusion throughout the organisation to the benefit of all its users. At a strategic level, our policy will be reviewed periodically in conjunction with statistics, emerging trends and legislation to ensure it remains relevant, current and reflective of internal and external influencing factors.

As part of our accountability as an employer, WBTC will ensure all staff receive appropriate induction concerning their personal rights and responsibility in relation to equal opportunity legislation and the implementation of our own policy and procedures.

6. How we promote and monitor Policy use with Staff, Learners, Employers and Subcontractors

- A. The Managing Director is responsible for implementing all aspects of the WBTC's Equal Opportunities Policy relating to the employment of staff.
- B. The Managing Director is responsible for ensuring that equal opportunities are actively promoted within all aspects of WBTC's operation. This includes the co-ordination, monitoring and evaluation of its overall effectiveness both internally

and externally, with staff, learners, employers and subcontractors.

- C. All Directors, Managers and Staff are responsible for promoting equal opportunities and putting our policy into practice within all aspects of their work, creating an inclusive and welcoming environment for all. We aim to provide a safe environment free from any form of direct or indirect discriminatory behaviour. All will not tolerate prejudiced behaviour. The promotion of fundamental British values is at the heart of our work.
- D. WBTC work to protect learners from radicalisation and extremism and respond swiftly where learners are vulnerable to these issues.
- E. All Learners receive Equality, Diversity and Inclusion awareness training as part of their Onboarding. Their understanding, commitment to Equal Opportunities and its implementation is contextualised throughout their programme and captured in Training and Monitoring visits where discussions take place to enhance learner knowledge. In addition, naturally occurring opportunities are also utilised to broaden learners' knowledge within training sessions and any other relevant opportunities.
- F. All Employers receive thorough advice and guidance about the apprenticeship programme from WBTC Advisers. An employer checklist is undertaken as part of our selection process. An employer 'reader friendly' version of our policy is issued to them and the employer's policy is reviewed to ensure it acts in accordance with our own. Formal compliance to our policy is captured within an Employer Agreement. Employer's checklists are reviewed annually to ensure conformity is maintained. In addition, employer's understanding, commitment to equal opportunities and its implementation is monitored throughout the learner's programme and captured in training and monitoring visits and any other relevant opportunities.
- G. Subcontractors and Suppliers are risk assessed through our Subcontractor Quality Assurance Checklist, Schedule 2. The amount of support and management of the subcontractor is planned in the annual Subcontractor and Supplier Plans. This is dependent on experience of the provider, quality and size of provision with our learners. Suppliers and subcontractors will be quality assured yearly or bi-yearly. Partnership meetings will be held with Subcontractors during the year. Frequency of these are again based on the above risk assessment. To ensure conformity is maintained, all visits/observations are formally recorded. Subcontractor's Agreements are renewed annually.
- H. Equality, Diversity and Inclusion Committee is responsible for supporting the delivery of a 'living' message of Equality Opportunity across the Company. The purpose of the group is to monitor the effectiveness of our policies, inform policy and disseminate good practice across the organisation. The group meets at least three times per year to support the implementation of our Equal Opportunities processes. Activity and direct focus areas are captured in our Quality Improvement Plan. Measures and outcomes of objectives and targets are applied across the year.

7. Policy Content and Breaches to Policy

- A. WBTC seeks to ensure equality of opportunity and the fair treatment for all those involved in our activities. This applies, whether a member of staff, learner, employer or subcontractor working with us in the delivery of our learning/training or employment programmes and services.
- B. WBTC will not tolerate, and vigorously works towards eliminating, any discrimination, harassment victimisation or bullying. This applies to all regardless of seniority, gender, religion, age, race/ethnicity, disability, religious or belief persuasion, marital status, and sexual orientation, gender reassignment or any other grounds. All parties are open to challenge any breach of this policy by making a formal complaint.
- C. In the event, if staff, learners, employers or subcontractors are alleged to be in breach of WBTC's Equality, Diversity and Inclusion Policy, an investigation will be carried out in accordance with our agreed complaints procedure and appropriate actions taken as deemed suitable.

For guidance on our complaints procedure, which supports the above covering harassment, bullying, other complaints and grievances, see Associated Policies Section.

8. WBTC will work actively to advance progression in 5 key areas

These Five Key areas (A-E) also form the underpinning of WBTC's Equality, Diversity and Inclusion Performance Indicators, (PI's) as shown below. These indicators and sub-related PI's are detailed and highlighted within the Self-Assessment Report (SAR) and Quality Improvement Plan. Our effectiveness is measured by these actions.

A. Participation of Learners, Retention and Achievement

WBTC supports learners regardless of gender, age, ethnicity, disability, religious or belief persuasion, gender reassignment, marital/civil single status, sexual orientation or pregnancy/maternity. We understand that sometimes your background can determine some of your learning needs. WBTC will work to ensure these are met and facilitate any learner's desire to remain in learning and achieve their learning aims to the best of their ability.

We will make reasonable efforts to meet the special needs of any individual arising from religious or cultural obligations.

B. Monitoring, Evaluation and Targeting Achievement

- I. **WBTC monitors full learner data** on the basis of race, gender, disability, and age and other protected characteristics to ensure that all groups of learners achieve and that any gaps in progress and attainment between different groups of learners are narrowed.

Where variation is found in the achievement of different groups of learners interventions will be taken.

- II. Learners make progress during their programme compared with their starting points, with particular attention to progress by different groups of learners.
- III. WBTC monitors staff in relation to a number of protected characteristics including religion and sexual orientation and is expanding its scope to include other protected categories.
Any indication of inequality will be investigated and acted upon, such as under-representation of groups.
- IV. Learner retention and achievement data will be collected and reviewed on a regular basis and any identified trends will be used to make targeted improvements;
- V. These processes will assist in confirming the success of our policy in terms of recruitment, retention and achievement. This will also identify any themes for specific action and assist benchmarking our performance against previous years.
- VI. Learners with severe and complex special educational needs will be encouraged to gain skills and progress to become more independent in their everyday life and/or progress to positive destinations such as work trials, employment or further education.
- VII. We will assist learners with special educational needs to become more independent in their everyday life by providing an enriching and relevant curriculum.
- VIII. Learners will be encouraged to provide feedback and/or raise concerns through our safeguarding team

PI.2

Recruitment by age, ethnicity, gender and disability aims to broadly reflect the sector profile.

C. Religion or Belief

We will

- ensure that employees' religion or beliefs and related observances are respected and accommodated wherever possible *and*
- respect people's beliefs where the expression of those beliefs does not impinge on the legitimate rights of others

D. Harassment and Discrimination

WBTC will protect learners from harassment, victimisation, discrimination or bullying of any kind. All learners, staff, employers and Subcontractors and Suppliers are required and expected to uphold these values.

E. Meeting the needs of the Learner, Recruitment and Widening Participation

- I. WBTC's ground floor is accessible to learners with mobility impairment. WBTC provides support to meet the learner needs and enable learners of different ability and social needs to access our programmes and succeed in their learning aims. (See Disability Statement, which sets out our support mechanisms to learners.) Our centre will be reviewed for accessibility and reasonable adjustments to meet specific access needs where applicable, will be addressed where practicable. Alternative arrangements will be

investigated to ensure no person is disadvantaged by not being able to access WBTC centre.

- II. The selection criteria applied to both staff and learners internally and by an employer will be assessed against how well a candidate can meet the requirements of the job description; meaning selection is made on ability to do the job/undertake training for the job.
- III. Recruitment of staff and volunteers will be subject to relevant DBS checks appropriate to safeguarding principles.
- IV. We will actively monitor our recruitment and staff development practice to measure our effectiveness in applying equality, diversity and inclusion to the recruitment, development and promotion of employees.
- V. Records of interviews are kept according to WBTC's procedures.
- VI. Positive Action - Employers have been entitled to encourage applications from groups they reasonably consider to be under-represented in their industry. WBTC will use this option where relevant.
- VII. WBTC respect the diversity of learners and wherever possible will draw on examples of cultural community backgrounds within teaching, training or assessment materials and marketing activities. Materials will NOT contain negative insulting stereotypes on any grounds.
- VIII. WBTC will engage Learners know how to keep themselves fit and healthy, both physically and emotionally.
- IX. Enrichment activities will allow all learners to explore personal, social and ethical issues and take part in life in community activities and the wider society in Britain.
- X. Complaints of any nature are reviewed throughout the year to ensure they are fairly resolved and in a manner that reflects our company policies.
- XI. All Staff respect each other and learners, and learners are expected to respect all staff and each other.

F. Celebrating diversity and promoting positive role models

- I. WBTC will reflect and promote positive contributions of all regardless of gender, age, race/ethnicity, disability, religious or belief persuasion, marital/civil or single status, sexual orientation or gender reassignment. It will ensure that our marketing plans reflect our policy and any special incentives to highlight under-represented groups/occupational areas. Where relevant, advertising will include our Equal Opportunities banner statement: "WBTC – paving the way for equality of opportunity in training, education and employment for all".
- II. WBTC will actively promote staff and training development in equal opportunities for all employees.
- III. WBTC will monitor and review the course materials and learning resources to ensure they are appropriate and promote, where appropriate, equal opportunities and do not contain any stereotypical or insulting images.
- IV. We will ensure our teaching, learning and assessment promote equality, raise awareness of diversity and tackle discrimination, victimisation, harassment, stereotyping, radicalisation and bullying
- V. WBTC will maintain partnership activities with groups and organisations to support and develop equal opportunities and promote and engage in positive actions for the benefit of all.
- VI. WBTC will review on an annual basis the effectiveness of our complaints procedures designed to assist learners, employers, staff and Subcontractors

and Suppliers which will raise any issue under equal opportunities or any other grievances.

VII. WBTC will ensure that our policy is understood and upheld by all those who work with us including staff, learners, employers, Subcontractors, Suppliers and partner organisations.

9. Review

The Policy will be reviewed every two years, sooner if legislation, best practice or other circumstances indicate this is necessary.

Notwithstanding our current policies and procedures, the ELT reserve the right to amend, curtail or terminate this policy at any time and without notice.

10. Associated Policies

There are further policies in support of this Equality, Diversity and Inclusion policy covering areas such as discipline and grievance, safeguarding, data protection, Code of conduct behaviour and harassment and disabilities which can be found on our web pages.


The above policy links to a number of associated policies and documents including but not exclusive to:

- Complaints/Appeals procedure
- Customer Charter
- Disability Statement
- Employer Contract
- Employer Vacancy Specification
- Harassment Policy
- Quality Improvement Plan
- Recruitment and Selection policy
- Self-Assessment Report
- Staff Personal Company Guide
- Strategic Business Plan
- Subcontractor Agreement

11. Quality Assurance

This Policy shall stay in force until any alterations are formally agreed.

12. Document Control

Document Name	WBTC Equality, Diversity and Inclusion Policy Sept 2021
Document Location	Staff Drive
Date Issued:	27 September 2021
Date Approved:	27 September 2021
Owner:	Executive Leadership Team
Approved by:	
Last Review/Approval	November 2016
Next Review Date	September 2023

**EQUALITY, DIVERSITY & INCLUSION
POLICY****Version Control**

Revision #	Date	Revision summary	Reviewed by
1	27/09/21	Updated in accordance with EDI meetings, reorganised	KA HRV