

EQUALITY AND DIVERSITY POLICY

<p>1. Statement of policy</p>	<p>Heathercroft Training Academy (HTA) recognises that as a work-based training provider it both serves and draws on the talents and skills of a diverse population. This diversity consists of both visible and invisible differences. Harnessing of these differences results in a vibrant and effective organisation and enhances the service it offers. HTA respect and welcome the varied contributions that individuals can make and seeks to reflect the communities in which we work and to enable equality of opportunity for all. HTA has an explicit commitment to the inclusion of all social groups and wherever possible encourages the formation of effective links with community organisations</p> <p>HTA has an inclusive and integrated approach to Equality and Diversity and will at all times work in such a way as to encourage equal opportunities and discourage acts of discrimination whereby one individual is treated less favourably than another for any reason, including the nine protected characteristics - race, religious beliefs, gender, sexual orientation, age, marital or civil partnership status, disability or pregnancy identified in the Equality Act 2010. In doing so it will ensure that all individuals are treated fairly and will actively seek the opinions of its employees/learners/apprentices on the development and performance of policies relating to equality to ensure they meet the needs of staff, learners/apprentices, and other stakeholders. Equality and Diversity is an integral part of our strategic plan and is embedded in all policies, procedures, and systems. Policies and procedures are accessible to staff and learners/apprentices.</p> <p>HTA is committed to a policy of Equality and Diversity which respects the identity rights and values of each individual and opposes all direct and indirect discrimination within the organisation. We believe everyone is entitled to a working and learning environment which promotes dignity and respect</p> <p>Diversity is celebrated. The organisation retains its 'Positive about Disability' kite mark and strives to promote an ethos and image that positively reflects its commitment to diversity, through its newsletters, advertising materials and programme literature. All external partners are required to demonstrate commitment to actively promote equality and diversity.</p> <p>The positive benefits of diversity are measured by monitoring the composition of our workforce and learner/apprentices' group and the impact of our recruitment and selection initiatives.</p> <p>The Company actively promote the principles underpinning equality to all organisations with which it works and all those who act on the company's behalf.</p>
<p>Scope</p>	<p>This policy applies to all staff, organisational partners, employers and work-based placements, contractors, visitors and the learners/apprentices, and covers all aspects of employment and service delivery including:</p> <ul style="list-style-type: none"> • Recruitment, selection and induction procedures for staff and learners/apprentices, • Staff supervision, appraisal, remuneration, promotion and training • Initial Assessment and Progress Review procedures for learners/apprentices • Assessment and Examination Policies for learners/apprentices
<p>Aims</p>	<p>The aims of this policy are to:</p> <ul style="list-style-type: none"> • deliver equality and diversity throughout organisational policies, procedures and practice and develop an ethos which respects and values all people • challenge discrimination and lack of opportunity and encourage other organisations and individuals to do the same to actively promote equality of opportunity • create a culture that respects and values an individual's differences and recognises that difference/diversity is an asset to our organisation both to its work and the people it serves. • eliminate all forms of unfair discrimination, bullying, harassment or other oppressive behaviour. No form of intimidation, bullying or harassment will be tolerated

	<ul style="list-style-type: none"> • take positive action to provide encouragement and support to individuals and groups whose progress has been limited by stereotyping and cultural expectations and to prepare learners/apprentices for life in a diverse society • ensure all employees, volunteers, learners/apprentices, and collaborative partners are aware and encouraged to support the objectives of this policy. • promote good relations amongst people within the organisation’s community and the wider communities within which we work • do our best, within available resources, to remove barriers which limit or discourage access to the Company’s training provision and activities • monitor the implementation, set targets for improvement, and evaluate the impact of equality and diversity action. <p>Equality of opportunity is fundamental to good practice in any organisation and fairness of opportunity for all is a basic right. This policy is therefore underpinned by a commitment to:-</p> <ul style="list-style-type: none"> • actively challenge to stereotypes, prejudiced attitudes, and unfair discriminatory behaviour • provide inclusive education which enables and supports all students to develop their full potential • the positive development of all staff • be accountable for compliance with this policy by all employees and others engaged in Company business or activities.
Definitions	<p>Equality Equality means ensuring that everyone is treated equally. It encompasses three main concepts:</p> <p>Equality of Opportunity. This means ensuring that all individuals, whether staff or learners/apprentices have fair access to opportunities within the organisation, regardless of their race, religious beliefs, gender, sexual orientation, age, marital or civil partnership status, disability, or pregnancy status. In the case of learners/apprentices it relates to entry to programmes, learning support, progression and assessment and examination opportunities.</p> <p>Equality of Treatment. This is concerned with treating everyone the same. Thus, in an organisational context it recognises that institutional discrimination may exist in the form of unfair procedures and practices that favour those with certain personal attributes, over others without them. The task of equal opportunities is therefore concerned with the elimination of these barriers.</p> <p>Equality of Outcome. This focuses on policies that either have an equal impact on different groups or intend the same outcomes for different groups. In order to ensure equality of outcome some individuals or groups may need to be treated differently</p> <p>Diversity (Protected Characteristics) The term Diversity describes the range of visible and non-visible differences between people regardless of gender, ethnicity, disability, sexual orientation, age, religious and cultural beliefs. Managing diversity harnesses these differences to create a productive environment in which everybody feels valued; where talents are fully utilised and in which organisational goals are met. (Kandola and Fullerton 1998)</p> <p>Discrimination takes place when an individual or a group of people is treated less favourably than others because of factors unrelated to their merit, ability or potential. It is unlawful to discriminate against someone on grounds of their gender (including gender reassignment), sexual orientation, marital status, race, colour, nationality, ethnic origin, religion, beliefs, disability, pregnancy or childbirth, or because they are a member, or not, of a trade union. It is also unlawful to discriminate against part-time workers. Discrimination may be ‘direct’, ‘indirect’ or “associative”</p> <p>Direct Discrimination is where a person is treated less favourably than another in comparable circumstances on a prohibited ground e.g. direct Sex Discrimination would be refusal to employ a woman because she was pregnant</p> <p>Indirect Discrimination is where there is no intention to discriminate, but a provision or practice is applied which is to the detriment of some members of the group being targeted. For example, an advertisement</p>

	<p>specifying an upper age limit of 28 years could be regarded as indirect discrimination against women because such a condition would have the effect of excluding many women temporarily unavailable for work for reasons connected with motherhood</p> <p>Associative Discrimination refers to situations in which an individual is discriminated against because of their association with someone who has a protected characteristic.</p> <p>Discrimination by 'victimisation' occurs where a person is treated unfavourably because, for example, he or she has brought proceedings, or given evidence or information in a case involving sex or race discrimination</p> <p>Bullying and Harassment are regarded as types of discrimination. People, especially those with disabilities, often suffer harassment through thoughtless and unintended derogatory remarks.</p> <p>Third party Harassment refers to harassment by people who are not employed by the organisation, e.g. contractors, suppliers or customers, and applies to all nine protected characteristics.</p> <p>All such behaviours are unlawful and in direct contravention of the Company's Equality Policy.</p>
<p>Duties and Responsibilities</p>	<p>The Executive Board:</p> <p>The Executive Board is responsible for ensuring that this procedure is implemented, but in practice will delegate the operational management of the requirements to the HTA Business and Performance Manager.</p> <p>The Business and Performance Manager (BPM)</p> <p>The BPM has overall responsibility on behalf of the Board for the implementation of this policy, ensuring the Company meets its legal and ethical responsibilities and advising the Board of any risk or issues arising out of it. Specific responsibilities include</p> <ul style="list-style-type: none"> • providing a consistent and high-profile lead on equality and diversity • promoting of equality and diversity inside and outside the training organisation • ensuring effective policies and procedures are in place to comply with all applicable legislation • implementing equality and diversity policies and codes of practice • ensuring quality audits are carried out in all areas of equality & diversity • baseline data is recorded on admission and used to ensure learner/apprentice progression and for staff recruitment and career progression • ensuring that all staff and learners/apprentices know their responsibilities and receive the necessary support and training. • relevant procedures and actions are followed in cases of unfair discrimination, harassment or bullying • reviewing the policy every three years <p>Employees</p> <p>Employees have a responsibility to :</p> <ul style="list-style-type: none"> • co-operate with the company to ensure that this policy is effective to ensure equal opportunities and to prevent discrimination • promote equality and diversity, and avoid unfair discrimination • embed Equality and Diversity in training, delivery and resources. • challenge, report and analyse any incidents of unfair discrimination, racial, sexual or other stereotyping perpetrated by staff, volunteers and/or learners/apprentices. • keep up-to-date with equality law and participating annually in equality and diversity training <p>Learners/Apprentices</p> <p>Learners/Apprentices have a responsibility</p> <ul style="list-style-type: none"> • participate in equal opportunity and diversity training • to behave with respect and dignity in any interactions with staff or other learners/apprentices. • report instances of unfair discrimination, or racial, sexual or other stereotyping. • comply with the company's equality and diversity policies and codes of practice

	<p>Any manager, employee or learner/apprentice who contravenes (or knowingly aids another person to contravene) the company's policy may be held personally liable for committing an act of unlawful discrimination and may, together with the company, be subject to legal proceedings. Disciplinary action may also be taken against any individual contravening this policy.</p>
<p>Policy implementation: Equality Policy</p>	
<p>Recruitment, Selection and Promotion</p>	<p>Staff HTA's intention in respect of recruitment, selection and promotion of staff is to appoint the most able candidate for each job regardless of whether the individual has a protected characteristic. Equality of opportunity is an intrinsic feature of all recruitment and selection processes and the requirements of each job are identified and all candidates assessed against the same criteria at each stage of the selection process, to ensure fairness and consistency are achieved throughout. Candidates for interview are selected based on their talent, skills, qualifications, and experience. No pre-employment health enquiries will be carried out unless this is to facilitate reasonable adjustments to enable the individual to attend for interview; to determine whether the individual can carry out essential elements of the job; to monitor diversity and take positive action.</p> <p>All candidates for promotion possessing appropriate skills; knowledge and experience are given the same degree of consideration.</p> <p>Employee appraisals are concerned only with the assessment of actual performance in the job. Assumptions about individuals, in relation to any of the protected characteristics, is unacceptable. Data relating to equality and diversity is collected anonymously for monitoring purposes</p> <p>HTA welcomes applications from a wide range of candidates, including those with criminal records. Applications from such individuals are dealt with in accordance with the policy for the recruitment of ex offenders.</p> <p>HTA are committed to ensuring that all staff understand the concepts of equality and, the importance of non-discriminatory attitudes and behaviour and that staff know how to implement these concepts in their work.</p>
<p>Induction</p>	<p>All newly appointed staff, full and part-time, undergo an intensive induction programme during their first six weeks with HTA, which underlines HTA' commitment to Equality.</p>
<p>Staff Development</p>	<p>Ongoing discussion of matters relating, directly or indirectly to equality is regarded as a vital element of continuing professional development of staff; both as a means to maintain the level of awareness of the policy and of ensuring that the policy operates as the company intends and that staff are:</p> <ul style="list-style-type: none"> • fully aware of their responsibilities to the promotion of equality and diversity. • properly equipped to take account of the different and special needs of particular individuals and/or groups and to make provision for those needs in both their own service delivery and the work placement.
<p>Conditions of Employment</p>	<p>All conditions of employment, employee benefits and services apply irrespective of race, religious beliefs, gender, sexual orientation, marital or civil partnership status, pregnancy, age or disability. Part time staff receive the same benefits as full time employees.</p> <p>Every effort is made to ensure that the Centre is accessible to disabled individuals and that accommodation and facilities are provided, as far as it is practicable to do so, which meet their needs.</p> <p>Training needs in respect of equality and diversity are assessed and identified as part of the annual training review and plans are revised annually.</p>
<p>Selection of Learners/Apprentices</p>	<p>Learners/Apprentices HTA's intention in respect of selection of learners/apprentices is to ensure that candidates are enabled to access programmes which meet their individual needs. The issue of race, religious beliefs, gender, sexual orientation, marital or civil partnership status, pregnancy, age or disability are irrelevant to the selection process. Specific records are kept in respect of the gender, ethnic origin and disability status of learners</p>


<p>Course Information</p> <p>Programme delivery</p> <p>Learner/Apprentice Support</p> <p>Assessment & examination</p> <p>Learner/Apprentice rights & responsibilities</p> <p>Access to premises</p> <p>Employment / Work placements</p>	<p>(EDIMS) which are discussed and evaluated at team, full staff and board meetings.</p> <p>Learner/Apprentice selection involves an in-depth personal assessment of each applicant using a standardised framework, free from any form of discriminatory practice, to assess candidates' ability, learning and support needs. All candidates are given impartial guidance, based on the assessment results, to ensure their placement on appropriate courses which offer success and progression, or where indicated are referred to other agencies, which can meet their needs more appropriately.</p> <p>Equality issues and the importance of respect and dignity are covered in depth during the participants' induction module which explores values in respect of equality and diversity; the main legislation and its impact on work and training; the policies and procedures relating to equal opportunities, harassment, and grievance. The module also helps people to understand their personal responsibilities to others. Topics relating to equal opportunities are discussed at all subsequent reviews to ensure learners/apprentices have an appreciation of the wide field covered under this banner; are not suffering from any form of discrimination or harassment and that their support needs are being adequately met.</p> <p>Course information contains clear and accurate information about the programmes available, promotes equality and is free from explicit or implicit discrimination. Every effort is made to ensure that the range and level of programmes offered meet and reflect the diversity of our learners/apprentices and community.</p> <p>Equality issues, including the nine protected characteristics, are embedded within the teaching of appropriate subjects as a cross-curricular theme. Teaching and learning materials actively promote tolerance and equality. Materials are carefully vetted to eliminate material which could be considered racist, sexist, ageist or prejudiced, on the grounds of sexual orientation or religious or spiritual beliefs, and to ensure that positive and diverse images are promoted.</p> <p>All learners/apprentices undergo a comprehensive induction process which encompasses equality and diversity as well as health and safety, safeguarding and security and the topics are revisited at one-to-one tutorial sessions and 8-week learner/apprentice reviews. Additional support can be offered by Team Leaders and/or the BPM if learners/apprentices need this.</p> <p>Programme delivery is underpinned by access to language and learning support where required and all learners/apprentices have equal access to a range of support services within HTA, which includes support from a mental health champion. Specialist resources are provided for those learners/apprentices who need them.</p> <p>Great care is taken to the Assessment and Examinations Policies are applied fairly.</p> <p>The Learner/Apprentice Code of Conduct highlights the rights and responsibilities of learners/apprentices in respect of equality and the standards of behaviour expected of individuals/groups.</p> <p>Premises are accessible to candidates with disabilities, and the mode of delivery can be, and as far as is reasonably possible is, adjusted to accommodate learners/apprentices with disabilities</p> <p>Employment premises/workplaces are carefully vetted prior to the placement of learners/apprentices as part of the Pre-Placement Assessment. The assessment involves establishing that the people in the workplace have a good awareness of equality issues and value diversity in their workforce which is reflected in the behaviour of staff and supervisors in the workplace. Staff are required to inspect the policies relating to Equality and Diversity and to note the date the policy was devised, and subsequently revised or reviewed and to offer advice guidance accordingly.</p> <p>Tutors identify opportunities in all areas in which they work to adopt the best approach to promote equality and good practice in respect of race relations, and to counter racism, sexism, ageism and prejudice against a person's sexual orientation or religion/belief</p>
Complaints of Discrimination	
<p>Reporting concerns</p>	<p>Should an occasion arise, or be suspected to have arisen, where an individual, staff or learner/apprentice, experiences unfavourable treatment in respect of any of the nine protected characteristics the matter must be reported immediately in accordance with the relevant part of the complaints procedure. An employee who feels he or she is unable to discuss the matter through the line management structure may</p>

<p>Investigating Complaints</p>	<p>contact any member of the management team.</p> <p>HTA will treat all complaints of unlawful discrimination seriously. All complaints will be investigated in accordance with our Complaints Procedure or where appropriate the bullying and harassment policy. Investigations will be handled sensitively and confidentially, with due respect for the rights of those concerned.</p>
<p>Outcomes</p>	<p>It is a disciplinary offence to discriminate intentionally against a fellow employee, job applicant or learner/apprentice, in contravention of the policy and action will be taken in accordance with the Disciplinary Procedure.</p> <p>Cases of unlawful discrimination will be reported to the police.</p> <p>Counselling is available for alleged victims of discrimination.</p> <p>A member of staff with a grievance concerning the application of this policy should follow the grievance procedure.</p> <p>Retaliation or victimisation of an employee/learner/apprentice who has complained about harassment will be treated as a disciplinary offence.</p>

Policy Implementation: Diversity Policy

	<p>Every effort is made, to ensure that prospective applicants, both staff and learners/apprentices, from minority groups are aware that their involvement will be welcomed and appreciated. Publicity materials subtly encourage underrepresented learners/apprentices to apply by using positive images and success stories.</p> <p>Induction procedures ensure that HTA's value system is communicated to all staff and staff receive ongoing training in respect of equality and diversity at all full staff meetings, the topic being an agenda item at both board and staff meetings. The induction programme for learners/apprentices, and course materials, are carefully planned to illustrate the positive aspects of diversity and diversity issues are embedded within the teaching of appropriate subjects as a cross-curricular theme. Programme delivery is underpinned by access to language and learning support where required and all learners/apprentices have equal access to the full range of support services within HTA.</p> <p>HTA have an open-door policy so staff and learners/apprentices can seek advice and support from the Directors, the BPM or any other senior member of staff they feel comfortable with.</p> <p>Every effort is made to ensure that the range and level of programmes offered meet and reflect the diversity of our learners/apprentices and community and to encourage contact with local community groups.</p> <p>Participation rates are collated and evaluated on an ongoing basis. EDIM data is analysed at all board and full staff meetings and appropriate actions taken if issues are identified.</p> <p>Employment premises/workplace are carefully vetted prior to the placement of learners/apprentices as part of the Pre-Placement Assessment to establish that the people in the workplace have a good awareness of the importance of valuing the diversity of their workforce and understand the behaviours which demonstrate this.</p>
--	--

<p>Monitoring the Impact of the Policy</p>	<p>The company will monitor and continuously review the operation of the policy and expects all employees to co-operate by providing relevant information, where necessary. All such information will be treated as strictly confidential and used solely for this purpose.</p> <p>Data will be gathered from a variety of sources including</p> <ul style="list-style-type: none"> • Learner/apprentice reviews • Client and staff questionnaires • Feedback from external agencies and partners • Analysis of complaints and grievances and their outcomes • Annual policy review • Quality audits. • Baseline data produced on the admission and progression of learners/apprentices with disabilities and in respect of staff recruitment and career progression. <p>Data relating to equality and diversity, e.g. ethnicity, gender and disability religion or belief and possible sexual orientation, is collected anonymously for monitoring purposes with a view to comparing trends and taking action to improve any imbalances identified. Data is collected in respect of:</p> <ul style="list-style-type: none"> • recruitment, selection, induction, supervision, appraisal, remuneration, promotion and training of staff • applications, selection, induction, enrolment, retention and achievement and progression of learners/apprentices, including progression within the Company, progression into other educational institutions and, where possible, progression to employment. <p>Data is stored confidentially, and access is restricted. Practice conforms to the GDPR regulations, and all staff have received training in respect of this.</p> <p>Equality, Diversity, and impact measures are reviewed on a monthly basis at all staff levels and are an agenda item at Board Meetings. Achievement rates for vulnerable groups are good.</p> <p>The company record, monitor and evaluate the number and outcome of complaints of discrimination.</p>
<p>Current Equalities Legislation</p>	<p>The Equality Act 2010 brings together and replaces all previous legislation on the subject</p> <ul style="list-style-type: none"> • The Equal Pay Act 1970 • The Sex Discrimination Act, 1975 • The Race Relations Act, 1976 • The Disabilities Discrimination Act, 1995 • The Special Educational Needs and Disability Act, 2001 • The Human Rights Act, 1998 • The Employment Equality (Sexual Orientation) Regulations, 2003 • The Employment Equality (Religion or Belief) Regulations, 2003 • The Equality Act (Sexual Orientation) Regulations 2007 • General Data Protection Regulation (GDPR) May 2018 <p>HTA also adhere to the basic tenets of Every Child Matters.</p>
<p>Cross Reference</p>	<p>Disabilities Disclosure Policy Complaints Policy Confidentiality Policy Whistle Blowing Policy Training and Development Policy Safer Recruitment and Selection Policy Induction Policies (Staff and Learners/Apprentices) Anti-Bullying and Harassment Policy Safe Travel and Transport Policy Safeguarding Policy</p>
<p>Audit and Review</p>	<p>This policy will be audited and reviewed every three years or more often if we identify any non-</p>

	<p>compliance or problems concerning equality and diversity issues with learners/apprentices or staff. Every effort will be made to involve learners/apprentices and staff in the review process.</p> <p>Corrective action will be taken if we discover non-compliance under this policy or any barriers to equal opportunities.</p> <p>When reviewing the policy, we will consider the outcome of monitoring and review actions under our communications and training plans.</p>		
First Issued 2011	Reviewed Feb 2021	Next review Feb 2022	Issue No. 12
Signed		General Manager/Director	Jo Cronin

Kandola, R. and Fullerton, J. (1998) Diversity in Action: Managing the Mosaic researched on internet.