

Scope

This procedure applies to Itec Training Solutions Holdings Group and all employees thereof. Throughout this policy, any references to “the Company”, means the Itec Training Solutions Holdings Group and its subsidiaries and associated companies.

This policy applies to all employees, full-time and part-time, whether fixed-term, casual or permanent. This policy does not form part of any employee’s contract of employment, is non-contractual and we may amend it, without notice, at any time.

Policy Aims

The Company recognises its responsibility in the promotion of equality and diversity and the elimination of discrimination. Our equality and diversity practices are an integral and fundamental part of this commitment. This policy applies to all employees, customers, learners, suppliers and sub-contractors working in partnership with or for the Company. It applies to all our functions, services, and employment practices and activities.

All employees, customers, learners, suppliers, and subcontractors of the Company are required to act in a way that does not subject any other employees or customer to any form of discrimination on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation (protected characteristics). The Company requires all its employees to behave in ways that promote equality and are non-discriminatory.

Where the Company operates as a prime contractor, the Company will work with suppliers and contractors in relation to ensuring equality, diversity, and the prevention of discrimination.

Purpose

Our policy is designed to ensure a coordinated approach to equality and diversity across the business. Our policy, procedure and plan set out our commitments to; equality and diversity; human rights; eliminating all unlawful and unfair discrimination and valuing the differences that diversity brings to our organisation and society as a whole.

It is our commitment to treat all current and prospective; employees, customers, learners, employers, suppliers and contractors fairly and equally, inclusive of protected characteristics. This applies to all our activities, including our role as an employer and as a provider of services, ensuring that all who, or wish to, access our services and our current and potential employees will be treated fairly and without discrimination.

This policy aims to ensure that no unfair, bullying, harassment and discriminatory practices exist within the organisation. The Company is opposed to all forms of unlawful and unfair discrimination (including harassment of any kind).

Discrimination on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation or any other form of difference will not be tolerated and breaches of the equality and diversity policy by employees will be dealt with under the company's disciplinary procedure.

Responsibilities

Board of Directors and Senior Management Team are responsible for ensuring that this policy is fully and effectively implemented and ensuring compliance with relevant legislation and promotion of best practice.

Board of Directors and Senior Management Team have overall responsibility for ensuring that the Company promotes equality of opportunity and eliminates discrimination. HR Director and Manager has senior responsibility for equality and diversity matters relating to staff. The Senior Quality Manager has responsibility for equality and diversity matters relating to learners, sub-contractors and other service users.

HR department and employee forum are responsible for developing new ideas, promoting equality and diversity in the company, highlighting areas of concern and good practice and monitoring progress with implementing our objectives.

HR Department is responsible for providing advice and guidance for managers and employees on staff equality and diversity matters and approving our equality policies, and reports. Monitoring compliance with meeting our legislative duties and completing impact assessments on our policies and procedures, promoting awareness of equality issues and disseminating good practice.

Senior Quality Manager is responsible for providing specialist knowledge and guidance for managers, employees and learners on learner equality and diversity matters. Quality Department is responsible for consulting with learners and sub-contractors on developments and continuous improvement.

All managers and employees are responsible for promoting equality and diversity and challenging discrimination, and for ensuring that it is embedded into their delivery, working practices and procedures. The co-operation of all employees is essential for the success of this policy and associated procedure. All employees are responsible for supporting the business in effectively implementing its key equality and diversity strategies and participate actively in measures introduced by the Company to ensure that there is equality of opportunity and are non-discrimination.

Policy Statement

The Company is committed to equal opportunities and challenging discrimination relating to all the protected characteristics. The Company is committed to ensuring a culture where people of all backgrounds and experience feel appreciated and valued. We are committed to achieving equality of opportunity for all.

The Company is committed to embedding our policy throughout our organisation and to equality and diversity as a guiding principle to:

- meet the requirements of equality & diversity legislation and comply with legal responsibilities.
- promote and provide clear guidance to staff, sub-contractors, customers, employers, and learners on their responsibilities in respect of equality and diversity and our policy.
- promote and adopt best practice within the business, promoting good relations, celebrating diversity and actively encouraging new innovations.
- ensuring all prospective and existing employees have equality of access through our employment policies and practices.
- ensuring all prospective and current learners, including apprentices, and customers, have equality of access and opportunities to achieve their full potential and in the recruitment, delivery of training and in all or work.
- develop good working relationships with local communities, employers, relevant external authorities and bodies.
- effectively consult with, communicate, provide training, advice and information for all staff, learners, customers, suppliers and other stakeholders on equality and diversity.
- effectively review, monitor and evaluate data by equality strand to identify trends and areas for improvement.

Equality Commitments

The Company is committed to promoting equality, eliminating discrimination, and fostering an inclusive and respectful environment for all. We recognise our responsibilities under the Equality Act 2010, which protects individuals from discrimination on the grounds of: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation.

As part of our commitment to equality, diversity and inclusion, we will aim to:

- promote equality of opportunity and work to eliminate unlawful discrimination, harassment and victimisation.
- foster positive and respectful relationships across the organisation and with external partners.

- work with employers, partners and suppliers to prevent harassment, support those affected, and take appropriate action where necessary.
- provide equality, diversity and inclusion training for employees and learners, including during induction.
- ensure our policies and practices are fair and do not directly or indirectly discriminate against any protected group.
- encourage participation in decision-making and provide accessible communication channels for all.
- make information accessible, where reasonable, including alternative formats for disabled people and accessible formats for individuals from minority ethnic backgrounds.
- promote the value of diversity among staff, learners and customers, ensuring recruitment, development and progression practices are inclusive.
- identify and respond to diverse needs in the planning and delivery of services.
- ensure services are accessible and meet the needs of all individuals.

Reasonable Adjustments

The Company has a duty to make reasonable adjustments to remove barriers for disabled people in employment, learning and service access. Adjustments may include:

- changes to working conditions, duties, environment or the workplace.
- time off for medical treatment or rehabilitation.
- specialist equipment or adapted materials.
- training, mentoring or support.
- reasonable adjustments for learners (QA035 Access to Fair Assessment Policy).

Employees who feel they may require reasonable adjustments can speak to their line manager or the HR Department at any time.

Further Commitments

To reflect the diverse communities we work with, the Company also commits to ensuring that individuals are not disadvantaged because of:

- caring responsibilities.
- health and wellbeing needs.
- socio-economic disadvantage.
- social exclusion.
- community fragmentation or lack of cohesion.

These factors are not protected characteristics under the Equality Act, but the Company recognises their impact on equality of opportunity and commits to addressing them where possible.

Genuine Occupational Requirements

In limited circumstances, it may be lawful to treat individuals differently where:

- there is a genuine occupational requirement, or
- it is a proportionate means of achieving a legitimate aim.

Such decisions must be justified, evidence-based, and demonstrate that no less discriminatory alternative is available.

Definition of Discrimination

Discrimination is unequal or differential treatment which leads to one person or group being treated more or less favourably than others are, or would be, treated in the same or similar circumstances on the grounds of age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race, religion or belief; sex; sexual orientation. Discrimination may be direct, indirect, by association, by perception, harassment or victimisation. Discrimination can be caused by individuals, groups, or institutions.

All forms of discrimination are unacceptable, such as:

Direct discrimination: Treating someone less favourably because of a protected characteristic.

Indirect discrimination: Applying a policy, criterion or practice that puts people with a protected characteristic at a particular disadvantage, unless it can be justified as a proportionate means of achieving a legitimate aim.

Associative discrimination: Direct discrimination against someone because they are associated with a person who has a protected characteristic.

Discrimination by perception: Direct discrimination against someone because they are wrongly perceived to have a protected characteristic.

Harassment: Unwanted conduct related to a protected characteristic that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment.

Sexual harassment: Unwanted conduct of a sexual nature that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment. This includes verbal, non-verbal or physical behaviour and does not need to be directed at a specific individual. The Company will take all reasonable steps to prevent sexual harassment, in line with the Worker Protection (Amendment of Equality Act) Act 2023.

Victimisation: Treating someone unfavourably because they have made, supported, or are believed to have made or supported a complaint under the Equality Act.

Breaches & Reporting Concerns

Should employees, through the course of their employment, be found to have caused or encouraged discrimination, this will be regarded as a serious offence, rendering them liable to disciplinary action. Employees may also be held independently and individually liable for their discriminatory acts by an Employment Tribunal and ordered to pay compensation to the person who has suffered as a result of discriminatory acts.

An employee who has a concern regarding unfair discrimination or harassment at work may use one of the Company's formal procedures e.g. grievance, respect at work, bullying and harassment.

Employees should draw to the attention of management alleged unlawful or unfair discriminatory acts or practices. In the event that an employee is the subject or perpetrator of, or witness to, discriminatory behaviour, please refer to the Company Handbook and contact the HR Department.



Esther Barnes
HR Director

Policy Review Date: June 2026
Next Policy Review Date: June 2027