

Equality, Diversity and Inclusion Policy

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Version Control

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1. Introduction

WBTC are committed to providing equality of opportunity in education, training and employment for its learners, employees, employers and subcontractors. 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. This commitment is shared and acted on by all WBTC staff.

Our Equality and Diversity statement:

"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."

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.

2. Scope

WBTC seeks to ensure equality of opportunity and the fair treatment for all those involved in our activities. This policy and associated procedures and guidance 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. This framework helps everyone to understand their responsibilities in supporting WBTC's commitment to equality, diversity and inclusion.

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. The Equality Act 2010

The 2010 Equality Act is a law that protects people from discrimination based on certain characteristics. The 9 protected characteristics are:

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

The Act also protects people from discrimination by association.

The main types of discrimination under the Equality act are:

- **Direct Discrimination**

Direct Discrimination occurs when someone is treated less favourably than others would be treated in the same circumstance because they have a protected characteristic.

- **Perceptive Discrimination**

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, for example, discrimination against someone because they are thought to be gay but are not.

- **Associative Discrimination**

This is direct discrimination against someone because they associate with another person who possesses a protected characteristic. For example, disability discrimination against someone who is a carer of a disabled person.

- **Indirect Discrimination**

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.

Indirect discrimination can only be justified in exceptional circumstances if it can be shown that the action was reasonable in managing the business or organisation, that is, it is 'a proportionate means of achieving a legitimate aim'.

- **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.

- **Third Party Harassment**

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.

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

- **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

WBTC expects all Trustees, employees, learners, employers and stakeholders to implement and uphold this policy. The Board of Trustees 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 employees 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. Promoting and Monitoring Policy

We promote and monitor policy use with employees, learners and employers through undertaking the following objectives and actions:

Objectives	Actions
a) WBTC will ensure the Equal Opportunity policy is adhered to in the recruitment of staff; and the staff and student populations are reflective of the local and wider community.	- Target vacancy advertising - Line Management One : Ones and reviews
b) WBTC actively promotes equal opportunities within all aspects of WBTC's operation and this is communicated to all stakeholders both internal and external.	- Prominent on website - Staff training - SLT Meetings - EDI Committee - Awareness training for learners during On boarding - Training and Monitoring visits - Value added workshops
c) Maintain an inclusive and welcoming environment for all. Provide a safe environment free from any form of direct or indirect discriminatory behaviour and promote fundamental British values at the heart of our work.	Surveys
d) All learners and Staff understand Equality, Diversity and Inclusion and their role and responsibility in modelling positive behaviour.	- Learners receive this as part of their Onboarding - Training and monitoring visits

7. Measuring Effectiveness of Equality, Diversity and Inclusion and Learner Achievement

WBTC evaluates the effectiveness of Equality, Diversity and Inclusion practices on our learners' progression and achievements based on 5 areas:

1. 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. WBTC will ensure all learners have the opportunity to achieve and will work to meet individuals' needs. We endeavour to 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.

2. Monitoring, Evaluation and Targeting Achievement

WBTC monitors and analyses all data and identifies any gaps in achievement rates on the basis of race, gender, disability, and age and other protected characteristics. We strive to ensure that all groups of learners achieve and that any gaps in progress and attainment are narrowed. Appropriate interventions will be implemented where variation is found in the achievement of different groups of learners.

We will:

- Review whether learners make progress during their programme compared with their starting points, with particular attention to progress by different groups of learners.
- Monitor employees in relation to a number of protected characteristics
- Investigate any indication of inequality and act upon findings
- Collect and review learner retention and achievement data on a regular basis and any make targeted improvements;
- Encourage learners with severe and complex special educational needs to gain skills and progress to become more independent in their everyday life. Furthermore, to help them progress to positive destinations such as work trials, employment or further education through an enriching and relevant curriculum
- Encourage learners to provide feedback and/or raise concerns through our safeguarding team

3. 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.

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.

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

WBTC's ground floor is accessible to learners with mobility impairment. WBTC provides support to meet learners' needs and enable learners of different ability and social needs to access our programmes and succeed in their learning aims. Our organisation 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.

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 and undertake training for the job.

Recruitment of staff and volunteers will be subject to relevant DBS checks appropriate to safeguarding principles. 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. Records of interviews are kept according to WBTC's procedures.

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.

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.

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.

5. Celebrating diversity and promoting positive role models

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. WBTC expect all staff to respect each other and learners, and learners to respect all staff and each other.

We will:

- Actively promote staff and training development in equal opportunities for all employees.
- 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.
- Ensure our teaching, learning and assessment promote equality, raise awareness of diversity and tackle discrimination, victimisation, harassment, stereotyping, radicalisation and bullying
- 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.
- 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.
- Ensure that our policy is understood and upheld by all those who work with us including staff, learners, employers, Subcontractors, Suppliers and partner organisations.
- Ensure that our marketing plans reflect our policy and any special incentives to highlight under-represented groups/occupational areas.

8. Equality Diversity and Inclusion Committee

WBTC 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.

9. Policy Content and Breaches to Policy

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. +

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.

Complaints of any nature are reviewed throughout the year to ensure they are fairly resolved and in a manner that reflects our company policies.

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

10. Review

This 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 Senior Leadership Team reserve the right to amend, curtail or terminate this policy at any time and without notice. It shall remain in force until any alterations are formally agreed.

11. Associated Policies

This 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
- Strategic Business Plan
- Subcontractor Agreement