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EQUALITY & DIVERSITY POLICY

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1 INTRODUCTION

Primary Goal will act to afford all its stakeholders' equality of opportunity and equal dignity – irrespective of their race, religion or belief, gender reassignment, disability, sex, sexual orientation, age, marriage or civil partnership, pregnancy and maternity and will equally apply this to its own staff. It will also be an exemplar exponent of Equal Opportunities, particularly in all its contact with employers and learners (including Apprentices).

Our Equality and Diversity Policy creates a framework for promoting and maintaining an inclusive environment where everyone can achieve. The Equality Act 2010 legally protects people from discrimination in the workplace and in wider society.

This policy has been written in line with legislation in the form of the Equality Act 2010. This act introduced a new single public sector duty for people who share the following protected characteristics:

- Age
- Disability
- Gender reassignment
- Marriage/civil partnerships
- Pregnancy and maternity
- Race
- Religion and Belief
- Sex
- Sexual orientation

Prohibited conduct

- Discrimination
- Direct discrimination
- Combined discrimination: dual characteristics
- Discrimination arising from disability
- Gender reassignment discrimination: cases of absence from work
- Pregnancy and maternity discrimination: non-work cases
- Pregnancy and maternity discrimination: work cases
- Indirect discrimination

Adjustments for disabled persons

- Duty to make adjustments
- Failure to comply with duty
- Regulations

Supplementary discrimination

- Comparison by reference to circumstances
- Irrelevance of alleged discriminator's characteristics

References to particular strands of discrimination

Other prohibited conduct

- Harassment including sexual harassment
- Victimisation

2 EXTERNAL PROMOTION OF EQUALITY AND DIVERSITY

- Primary Goal staff will challenge employers whose recruitment policies or practices appear discriminatory and we will advise employers about best practise.
- We will actively promote the advantages of recruiting a diverse workforce.
- We will encourage all our customers to respect the differences, cultural or otherwise, of our learners (including Apprentices) and we will take action to prevent and deter harassment.
- We will have a clear complaints procedure and ensure our customers know what it is.
- When recruiting we will follow the best practise. We will maintain our links with the local organisations who we know many have access to jobseekers from different minority ethnic groups or disabled jobseekers and promote our opportunities through them.
- Our commitment to Equality and Diversity will be promoted on our website. A copy of this Policy can be found here: <https://primarygoal.ac.uk/policies>

3 OUR COMMITMENT AND INTERNAL PROMOTION

- Equality and Diversity will form part of all staff onboardings, CPD plans and annual mandatory training requirements.
- The Equality & Diversity policy is available on our website and our IMPROVE training portal for all existing staff to view and new staff are required to acknowledge that they have read and understood the policy using the IMPROVE training portal
- We will provide training for our staff so that they are competent in providing advice and clearly understand their roles and responsibilities and the risks of indirect or institutional racism. Equality and Diversity training will form a key part of all staff annual appraisals
- We will continue to set ourselves targets to achieve. Our Apprenticeships Governance Board will regularly monitor and review our progress in meeting our Equal Opportunities objectives.
- We will ensure that we exceed the requirements of the Disability Discrimination Act in being able to identify and meet the needs of disabled learners, customers, and staff.
- We will regularly review all aspects of our operation to ensure we do not appear to be indifferent to the needs of disadvantaged groups, and do not encourage them to use our services. This includes performance data that will be shared with the Management team and Board. We will use this information to make any changes to delivery to ensure no group of learners (including Apprentices) is disadvantaged when compared to other groups of learners.
- We will consider flexible working or other means to help our staff or volunteers meet their domestic, caring or childcare responsibilities.
- We will train all apprentices in Equality and Diversity legislation as part of their apprenticeship.
- We will encourage all apprentices to raise concerns relating to Equality and Diversity in the workplace or elsewhere with their Work-based Coach, or any other member of Primary Goal staff.

4 RECRUITMENT AND SELECTION

Advertising of vacancies takes account of this Equality and Diversity policy:

- Recruitment material aims to encourage applications from individuals who have appropriate qualifications and/or experience
- When deciding on advertising media, the Company will endeavour to ensure that diverse groups will view the advertisement
- Advertisements will use non-discriminatory language
- Job requirements e.g. travel, hours of work, location etc. will be justifiable and non-discriminatory. Focus will be on essential and objective job-related criteria
- Reasonable adjustments will be made to the role or workplace to accommodate disabled employees

Selection Criteria also take account of this policy in that:

- Applicants will be assessed on their relevant merits and abilities
- Adjustments will be made where it is considered that selection methods may disadvantage any particular group

Our Onboarding process takes account of our commitment to Equality & Diversity. The employee's contract of employment refers to the Employee Handbook, Company policies and procedures of which this policy is included

5 STAFF TRAINING

Staff training sits at the heart of our approach to implementing this Equality and Diversity policy:

- Equality and Diversity forms part of all staff onboardings, which sits within the IMPROVE online training portal where knowledge is tested and tracked.
- Equality & Diversity is considered as part of the individual's CPD plan and Primary Goal's annual training plan.
- Equality and diversity training forms part of the mandatory training that all staff are required to undertake every year.
- Equality & Diversity update training is delivered face to face as well as through the online training portal to share developments and best practice during whole-team and standardisation meetings for Curriculum and Delivery staff

6 BULLYING AND HARASSMENT

Primary Goal has a Bullying and Harassment Policy in place to support our commitment to fair treatment, we aim to create a workplace where learners including Apprentices, employees, volunteers and customers can work without fear of harassment or bullying. Primary Goal insists that any form of harassment and any subsequent victimisation or recriminations, is unacceptable. We will not tolerate or condone such behaviour from either

learner, staff, customers or any third party. Primary Goal will take all reasonable practical steps to resolve complaints of harassment, bullying or victimisation fairly and quickly.

Primary Goal's Bullying and Harassment policy can be found here: <https://primarygoal.ac.uk/policies>

7 DEFINITIONS

The following definitions apply to this policy:

Harassment – 'unwanted conduct affecting the dignity of men and women in the workplace. It may be related to age, gender, sex, race, religion or belief, disability, religion, nationality or any personal characteristic of the individual and may be persistent or an isolated incident. The key is that the actions or comments are viewed as demeaning and unacceptable to the recipient.

Bullying – 'may be characterised as offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means intended to undermine, humiliate, denigrate or injure the recipient.

Examples of unacceptable behaviour:

- Spreading malicious rumours or insulting someone
- Copying emails that are critical about someone to others who do not need to know
- Ridiculing or demeaning someone – picking on them or setting them up to fail
- Exclusion or victimisation
- Unfair treatment
- Overbearing supervision or other misuse of power or position
- Unwelcome sexual advances – touching, standing too close, display of offensive comments
- Making threats or comments about job security without foundation
- Deliberately undermining a competent worker

Equal opportunities mean treating everyone in the same way. Diversity means difference and recognising that each of us are unique.

Differences can be many and varied, and include but are not limited to the legally protected characteristics:

- Race
- Culture
- National Origin
- Region
- Gender
- Sexual Orientation
- Age
- Marital Status
- Politics
- Religion
- Ethnicity
- Disability
- Socio-economic difference

8 ENFORCEMENT

Primary Goal takes Equality and diversity seriously, and will take action where required:

- Employees who consider that they have been unfairly treated on a discriminatory basis should follow the Company's grievance procedure. See the Grievance Policy for details.
- In appropriate circumstances, consideration will be given to any request for the complainant to remain absent from work during a grievance investigation or until the outcome of the grievance is determined. As an alternative, it may be permissible to separate the complainant and the person against whom the complaint is directed.
- Any employee who is found to have committed an act of unlawful discrimination or otherwise breached this Policy, will be subject to the Company's Disciplinary Policy.
- No employee will face reprisal for raising such a grievance unless it is untrue and not made in good faith.

9 REVIEW

Primary Goal will review this Policy annually. The review will be undertaken by the Management Team, with a nominated member of the Governance Board or Management Team responsible for leading the review.