

## **CENTRAL TRAINING GROUP**

# Equality, Diversity & Inclusion Policy 2023-2024

#### **MISSION STATEMENT**

Central Training is an innovative and high quality-learning provider, committed to the continued improvements of learners and employee skills. We aim to:

- Provide learners with the best possible level of teaching, assessment, information, advice and guidance
  to enable them to progress well and achieve their learning goals through strong leadership and
  management
- Ensure that all learners and employees improve their English and Maths through rigorous training and curriculum development
- Responding to employer skills gaps and Government targets by offering a curriculum that meets the needs of industry and learners.
- To review the service that we provide to our learners and employers by continually encouraging an open and self-critical environment
- Encourage creativity and innovation from staff
- Promote lifelong learning with learners, staff, and employers

#### **OUR VISION**

We aim to be recognised as one of the leading Learning Providers in the UK for youth and adult education programmes by delivering a 'Good' service to our learners and employers and striving to continually improve our learners' progress and successes.

## **'BREAK THE BARRIERS - LIVE THE DREAM'**

#### **OUR VALUES**

#### **Teamwork**

Support, listen and respect one another, whilst working together towards achieving company objectives and by making Central a fun and enjoyable place to work.

#### Safeguarding

Ensure that the health, safety and well-being of our learners and staff is at the heart of the company.

#### **British Values**

Rigorously promote and encourage learner and staff awareness of British Values, avoiding radicalisation of any kind and ensure an in-depth awareness of their rights relating to Equality and Opportunity.

# **Customer satisfaction**

Uphold the highest integrity with openness and honesty at all times, by doing what we say we will, without compromising on quality whilst meeting customers' needs.

#### **Business success**

Employees that use initiative take ownership for the company, its customers and colleagues, have the passion, and drive to achieve effective results.

#### **Personal development**

We value learning and take responsibility to gain the required development in meeting our learners' needs. Therefore, personal development, feedback, coaching and mentoring are core principles at Central.

1

Created: August 23 Review: August 24

#### **Policy Statement**

Central Training Group and its Partners (CTG) recognises and accepts responsibility for providing equality of opportunity to all staff and persons eligible for training, irrespective of Age, Disability, Gender Reassignment, Marriage and Civil Partnership, Pregnancy and Maternity, Race, Religion or Belief, gender or Sexual Orientation.

CTG recognises its responsibilities under the Equality Act 2010. We aim to ensure that neither CTG nor its sub-contractors commits either direct or indirect discrimination against any person as defined in the terms of the said act.

CTG review and amend this statement regularly to ensure that it meets legislation and remains effective. The updates are brought to the notice of our learners/employees and workplace providers and employers via our website: <a href="https://www.centraltraininggroup.com">www.centraltraininggroup.com</a>

All learners/employees and workplace providers are strongly encouraged to use the Compliments & Complaints procedure if they feel they have been discriminated against for any of reason.

## Role and Responsibility

It is CTG policy to ensure that no person involved or associated with CTG receives less favourable treatment for any of the following:

Nationality, religion, reverence, racial or ethnic origin, language or culture, disability including limitations to physical access or resources, marital status, responsibility for dependants, age, gender, including pregnant women, nursing mothers or persons on maternity leave, gender identity, sexual orientation or preference, ability in literacy or numeracy, technical knowledge or skill, behavioural or learning difficulties, lack of ability or insufficient formal qualifications, being an ex-offender, substance abuse, social isolation and homelessness, unemployment, contract worker, asylum-seeking status or for any other identifiable discriminatory cause.

CTG believe in human rights for all those connected with this organisation and all members of society and include awareness of the subject within all CTG courses and training programmes. Action shall not be taken against them by any person connected with CTG which could lead to social exclusion and may devalue their contribution to society as a whole, to this organisation or lead to a loss of self-respect for them or respect for them from others.

The responsibility for compliance and for the positive attitude required to ensure success is laid upon all staff within CTG. All external persons connected with CTG are encouraged to hold the same responsibility and commitment.

## **Equality and Diversity Awards**

CTG's commitment to Equality and Diversity is continuous and CTG achieved and maintained the Investors in Diversity Stage 2 Award since September 2012.

#### **Equality and Diversity Champion**

CTG recognise the importance of equality and diversity within the organisation and as such have appointed an E&D champion to raise awareness throughout the group. Prim Campbell can be contacted via her company e-mail; <a href="mailto:primcampbell@centraltraininggroup.com">primcampbell@centraltraininggroup.com</a>

#### **Gender Equality**

Considerable progress has been made towards gender equality and the Equal Opportunities Commission was involved in the many advancements and achievements that have been made in this area of diversity. For example, men and women must be paid equally for the same or similar work; maternity leave is now available for all women in employment; part-time workers now have the same rights as men and women working full-time; and both men and women are entitled to access concessionary fares and free prescriptions at the same age.

Therefore Central Training Group and its partners (CTG) will:

- Eliminate unlawful discrimination and harassment.
- Promote equality of opportunity between men and women.

2

Created: August 23 Review: August 24 "Unlawful discrimination" in relation to gender is defined as:

- Direct and indirect discrimination on grounds of sex.
- Discrimination on the grounds of pregnancy and maternity leave.
- Discrimination on the grounds of gender reassignment.
- Direct and indirect discrimination against married persons and civil partners.
- Victimisation.
- Harassment and sexual harassment.

Whilst there is a tendency to focus on equality for women when looking at gender issues this also applies to men as well as the particular needs of transsexual and transgender people. In 1999 the SDA was amended by the Sex Discrimination (Gender Reassignment) Regulations to make it clear that transsexual men and women are expressly included in the SDA where they suffer discrimination because they have undergone, or are about to undergo gender reassignment. This was the first positive step towards ensuring that men and women receive services and are offered employment and development opportunities that meet their needs, abilities and aspirations more closely. (Please refer to the IAG & Admissions Policy and HR & Safer staff Recruitment Policy).

## Positive Discrimination against Gender Stereotyping

All staff shall make every effort to inform learners of opportunities to break out of stereotypical roles at work. Vocational training providers are permitted by law to be proactive in trying to introduce men and women into areas of work not considered normal activity to a particular sex. For example, positive steps are taken to encourage male applicants onto CTG Hairdressing courses, which currently attract a female majority. Our recruitment literature is designed to encourage both genders and learners from ethnic minorities. Information and recruitment talks are also arranged at single sex schools to combat stereotyping.

#### **Sexual Orientation**

CTG celebrates and values the diversity of its staff and learners and aims to ensure they are welcomed and are treated fairly and with dignity and respect whatever their sexual orientation. CTG recognises that some of our staff and learners may identify as LGBTQIA+. This means they identify as lesbian, gay, bisexual, transgender, queer, questioning, intersex or asexual. Some may identify their gender and/or sexuality in other ways.

CTG recognises non-binary people who may identify as an intermediate or separate third gender, identify with more than one gender, no gender, or have a fluctuating gender identity. CTG will adopt the individual's preferred pronouns e.g. they/them/their used in the singular.

## **Racial Equality**

The definition of race includes colour, nationality, ethnic origins, and national origins and provides Protection on the grounds of nationality and is subject to compliance with immigration rules.

The Act also places a duty on colleges to:

- Eliminate unlawful discrimination, harassment and victimisation
- Advance equality of opportunity between different groups
- Foster good relations between different groups

The Commission of Racial Equality's Code of Practice has established guiding principles that govern public authorities (Schools, FE, HE and Learning Provider Institutions). These are:

- 1. Promoting race equality is obligatory for all public authorities.
- 2. Public authorities must meet the duty to promote race equality in all relevant functions.
- 3. The weight given to race equality should be proportionate to its relevance.
- 4. The elements of the duty are complementary (which means they are all necessary to meet the whole duty under the race Relations Act Amendment 2000).

3

#### **Racial Harassment**

Racial harassment is defined as any form of behaviour that has the effect of intimidating, humiliating, ridiculing and/or undermining the confidence of a person or group of people due to their colour, nationality or ethnic group. This includes the display of offensive material including graffiti, different treatment, oral or physical abuse, derogatory comments and/or jokes and written abuse, including material placed on social media.

Failure to treat others with dignity and respect need not be deliberate. Wounding remarks may be made unintentionally, as a result of ignorance or lack of thought. Nevertheless, any behaviour or actions contrary to this policy will be considered to be a serious disciplinary matter.

#### Religion, belief and non-belief

CTG recognises the right to freedom of thought, conscience and religion. The right to manifest beliefs is qualified by the need to protect the rights and freedoms of others.

CTG recognises the commitment of individual employees and learners to pursue a spiritual or religious practice and actively supports their right to do so in an atmosphere of tolerance and respect.

CTG further recognises that there is a variety of obligations placed upon those following particular faiths. Where practicable, CTG will provide information and facilities.

## **Disability Equality**

Disability is defined as a physical or mental impairment that has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. Long term means it has lasted for at least 12 months, it is likely to last at least 12 months, or is likely to last for the rest of the life of a person. Also covered by the definition are people with a severe disfigurement, HIV infection, cancer or multiple sclerosis. Additionally, people who have had a disability in the past are covered, which may be particularly relevant for people with fluctuating and/or re-occurring impairments.

#### Staff and Learner Recruitment

CTG welcomes applications from a range of people. CTG recruitment advertising does not and will not contain clauses intentionally discouraging applications from disabled people. Disabled applicants will not be considered less favourably than those without disabilities, except where there is a substantial reason preventing employment.

Consideration will be given to making reasonable adjustments, where practicable, to the workplace of learning environment to accommodate for disabled applicants.

## To protect staff and learners alike, the following has been put in place.

- Procedure for learner recruitment including avoidance of stereotyping.
- The right to have a friend, supporter or mentor present during interviews.
- Information, Advice and Guidance (IAG) on referrals of staff and learners to other agencies and organisations for further help and support.
- Implementation of effective policies and procedures throughout the company for dealing with harassment or discrimination of learners and staff.
- Regular monitoring of relevant equality and diversity legislation.
- Procedure for staff recruitment, selection, promotion, training, redundancy and retirement or dismissal.
- All staff are issued with a Staff Handbook at induction.
- All teaching staff are issued with a Tutor Handbook and a Manual is available at each site.
- Equality and Diversity training incorporated into staff and learner inductions.
- Equality and Diversity training embedded into all CTG courses.
- Equality and Diversity awareness training for staff at staff conferences.
- All employers are issued with an Employer Handbook giving guidance on Equality and Diversity.
- All employers are expected to have an Equality and Diversity Policy or adopt the CTG Policy.
- Staff and learners are issued with dress code guidelines.
- Advice and guidance for redress against harassment and bullying.
- Advice and guidance on making complaints and redressing grievances.

4

Sue Irons
Director of Compliance

- The qualification assessment appeals procedure.
- The right of access to personal data on a need to know basis.
- Copyright of designed training notes and other materials.
- Guidance on advice and permissions to staff and learners concerning religious belief, including customs, festivals and holy days.
- Restrictions in the use of the Internet limitations on access to certain websites.
- Advice and guidance on the display of potentially offensive material.
- Advice and guidance on the design and content of training materials and sessions.
- A disability statement, which provides advice and guidance for disabled learners.
- Access to flexible working arrangements

Consideration is given to the quality and wording of advertising and publicity. There are quality procedures for the recruitment of staff and learners, which encourage social inclusion and exceed the requirements for Equality and Diversity. The facilities used by learners are subject to regular formal review and, where practical, necessary improvement. Learners are encouraged to discuss their concerns both formally and informally, in private, if requested.

Training materials are subject to quality control to ensure the contents do not offend any group. The use of electronic communication is monitored to ensure that no offensive material is introduced into the training or working environment and that personal privacy of data is protected. The structure and content of training is regularly evaluated to ensure that it does not offend or infringe upon any person's rights.

The workplace or work placement contract procedures are examined periodically to ensure fairness. The wording of contracts or service level agreements contains wording which describes the equality and diversity policy of CTG, in an easily understandable way, to any external organisation.

A copy of the policy will be provided with the staff handbook to all members of staff and Partner Companies. Statistics are gathered, analysed and used by managers to improve policy implementation and to increase the level of proactivity. Management strategies and techniques are regularly evaluated to ensure fairness of conduct. The Board of Directors and Quality Director will monitor the equality and diversity policy on an annual basis.

CTG hold the right to request a standard of dress appropriate with circumstance and safety at work. The dress code takes into account concerns by any person whose religious or ethnic customs require a particular type of dress. Fasting periods and other periodic religious or ethnic requirements including time and location and privacy for prayer will also be considered on a case- by-case basis.

Because learners are in receipt of government funding for their training they are to be separately protected by CTG at all times. Learners are to be politely questioned in confidence on each occasion of formal review and at other appropriate times as to their level of contentment with their workplace or work placement. Confidential records of discussions concerning these aspects must be recorded.

CTG will hold it as an offence against this policy if any person gives a false accusation against another learner or staff. Accusations of a false nature can be deemed as legally defamatory. All those involved in the investigation of any complaint must keep the matter strictly confidential.

## Thriving in an Inclusion Environment

Everyone in our workforce and enrolled in our centres is unique and brings their own individual perspectives. We represent different age groups, socio-economic backgrounds, faith and beliefs. To gain the benefits of this diversity we must embed an inclusive culture where everyone feels comfortable voicing their own opinions and ideas. We will create a workplace culture which encourages all of us to be ourselves at work. An inclusive culture leads to engaged people, increases productivity, reduces turnover and sickness rates and delivers better outcomes for the public. Everyone, whether we are from a currently underrepresented group or not, has a role to play in creating a more inclusive culture.

#### Right to Advice and Counselling

CTG will ensure that all persons have a right to advice and to legal protection. This will be achieved either by a person appointed by CTG giving advice in confidence to any learner or staff member, or

Created: August 23
Sue Irons
Review: August 24
Director of Compliance

by referral to an external specialist source such as a solicitor or counselling agency. Furthermore. CTG confirm that we will, if unable to help them specifically, refer them to other agencies or organisations so that a continuous pathway of help and advice is formed. Time off from training or staff work will be given to attend external appointments.

## Staff and Learner Interviews and Initial Assessments

The results of all initial assessments for learners and any tests for staff are always available to them, and any discussions will be carried out in such a way as to preserve individual confidentiality.

CTG has a policy that access to employment within the organisation and to training courses is open and fair.

Where a DBS check is required as part of the recruitment process, shortlisted applicants are required to disclose convictions and/or other offences on the self-disclosure on the company application form. CTG will ensure that every applicant for a DBS check is aware of the existence of the DBS Code of Practice and will make a copy available on request.

Unless the nature of the position allows CTG to ask questions about your entire criminal record, except for certain spent convictions and cautions which are 'protected' so not subject to disclosure to employers and that cannot be taken into account, we only ask about 'unspent' convictions as defined in the Rehabilitation of Offenders Act 1974 (updated March 2014).

No person shall be forced to put down any detail on their application which they are concerned might lead to an infringement of their human rights.

For further guidance on employment of ex-offenders, please refer to our DBS Vetting policy.

## Accreditation of Prior Learning and Time Off-Work for Learning

Learners' previous experience and qualifications must be formally taken into account for the purposes of accreditation of prior learning for national vocational qualifications.

Staff will be entitled to training for the needs of their job and also for personal development. Learners and staff will be entitled to time to study. Staff are able to negotiate time off-the-job for learners to carry out personal study for their programme or for formal training sessions at work, or at CTG centres.

## Selection for Redundancy or Redeployment to another Post

All direct or indirect discrimination will be avoided during selection processes for any redundancies or for redeployment to other or new posts. Nursing mothers, those expecting or on maternity leave will all be protected according to statute.

# Management Responsibility and Vicarious Liability

The Chairman, Directors and all other members of the management team accept full responsibility for the discharge of the various laws and Acts of Parliament and fully understand the implications for them of vicarious liability.

In order for the equality and diversity policy to be fully effective, the responsibility for ensuring that the terms are adhered to will lie with the Chairman. It is however the responsibility of all Directors, Managers and Staff to actively promote equality and diversity within their own spheres of responsibility.

CTG informs employees and sub-contractors of their responsibilities and opportunities under equal rights legislation, makes the equality and diversity policy known, and provides appropriate training to all staff. CTG will take disciplinary action against employees and learners who are found to infringe the policy.

# Co-operation by Staff and Learners

As a part of CTG you have a duty to cooperate and comply with any measure set out to improve or sustain the concept of equality of opportunity.

You must report bullying and harassment. You must not encourage or allow others by omission to carry our any discriminatory act.

Created: August 23 Review: August 24 Sue Irons
Director of Compliance

# Staff and Learners – Right to Information

All staff and learners will receive initial, regular and updating briefings on all appropriate aspects of equality and diversity rights and responsibilities.

As long as you are a member of this organisation, a sub-contractor or a participant in one of the training programmes, you have an obligation to act in accordance with the ethos set out in this policy at all times.

# This policy is supported by the following:

- Safeguarding Policy
- Staff Handbook
- Learner Handbooks
- Disabled Learner Policy
- Anti-Harassment Policy
- IAG & Admissions Policy
- Academic/Disciplinary Procedures
- Academic Appeals Procedure
- Compliments & Complaints Procedure
- DBS Vetting Policy incl. Ex-Offenders Guidance

#### **Queries and Concerns**

All queries and concerns about Equality and Diversity issues should be referred to the Group Managing Director or the E&D Champion, Prim Campbell.

## **Suggestions for Improvement**

Please feel free to offer suggestions on the improvement of equality opportunities systems and procedures within this organisation.