

## **Central Training Group**

# Equality, Diversity & Inclusion Policy 2024 – 2025

### **Contents**

Item	Description
1	Introduction
2	Equality, Diversity and Inclusion Champion
3	Definitions Direct Discrimination Indirect Discrimination Harassment Victimisation Disability Discrimination
4	Positive Discrimination
5	Thriving in an Inclusive Environment
6	Staff and Learner Recruitment
	Staff and Learner Interviews and Initial Assessments
7	Right to Advice and Counselling
10	Cooperation by Staff and Learners
11	Management Responsibilities and Vicarious Liability

#### **Introduction**

Central Training group (CTG) recognises and accepts responsibility for providing equality of opportunity to all staff and persons' eligible for training in compliance with the Equality Act 2010. No job applicant, employee, worker, learner or visitor to our premises will receive less favorable treatment in terms of direct or indirect discrimination, harassment or victimisation on the grounds of the nine protected characteristics as defined by the Equality Act 2010.

The Protected Characteristics are age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership, pregnancy and maternity. The policy of non-discrimination will also apply to membership or non-membership of trade union and "spent convictions" of ex-offenders.

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 reason.

CTG recognises the right to freedom of thought and recognises the commitment of individuals to pursue its practice and actively supports their right to do so in an atmosphere of tolerance and respect. Failure to treat others with dignity and respect need not be deliberate. Wounding remarks may be made unintentionally because of ignorance or lack of thought. Nevertheless, we seek to provide a working environment free from harassment, discrimination and victimisation and we will not tolerate any form of discriminatory behavior against any staff member, students/apprentices, employers or members of the public.

#### <u>Implementation Arrangements</u>

CTG recognise the importance of equality, diversity and inclusion 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>

Staff and Learners and their employers are to be made aware of our policy and procedure. New staff members and Learners are made aware of this policy and procedure during the formal induction process. Updated and amended policy will be disseminated and reinforced in training sessions, team meetings and at staff conferences, and as part of teaching, learning and assessing practice.

#### **Definitions**

**Direct Discrimination** occurs when a person is treated less favorably than others in similar circumstances on the grounds of race, colour, national or ethnic origins, sex, marital status, sexuality, disability, membership or non-membership of trade union, "spent convictions' of ex-offenders, class, age, political or religious belief.

**Indirect Discrimination** occurs when a condition or requirement is imposed which adversely affects one particular group considerably more than another and cannot be strictly justified in terms of requirements for performing the job.

Harassment is defined as repeated, unreciprocated and/or unwelcome comment looks, actions,

Created: August 24 Review: August 25 suggestions or physical contact that is found objectionable and offensive and that might threaten an employee's job security or create an intimidating working environment. Harassment is particularly liable to occur as part of sexual or racial discrimination.

**Victimisation** is the retaliation against someone who has complained or has supported someone else's complaint about discrimination or harassment.

**Disability discrimination** includes direct and indirect discrimination, any unjustified less favorable treatment because of the effects of a disability, and failure to make reasonable adjustments to alleviate disadvantages caused by a disability.

#### **Positive Discrimination**

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 all individuals. Information and recruitment talks are also arranged at single sex schools to combat stereotyping.

#### **Thriving in an Inclusion Environment**

CTG celebrates and values the diversity of our staff/learners and is committed to equality of opportunity for all. We understand they 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.

#### **Staff and Learner Recruitment**

CTG welcomes applications from all sections of our community and from all levels of ability. CTG recruitment advertising will ensure that procedures are user friendly and avoid unnecessary barriers to access for potential staff or learners. We will make clear our expectations and commitments to equality, diversity and inclusion in our marketing materials and events, Consideration will be given to making reasonable adjustments, where practicable, to the workplace and learning environment to accommodate for disabled applicants, ensuring that students/apprentices with learning difficulties and / or disabilities receive appropriate additional support to meet individual needs.

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

- Procedure for staff and learner recruitment includes avoidance of stereotyping and discrimination.
- 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

Created: August 24 Review: August 25

and organisation for further help and support.

- Regular monitoring of relevant equality and diversity legislation.
- All staff and Learners are provided with a comprehensive Induction session
- All teaching staff are issued with a Tutor Handbook and a Manual is available at each site.
- Equality and Diversity training is 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 and are expected to have their own Equality and Diversity Policy or adopt the CTG Policy.
- Staff and learners are issued with dress code guidelines.
- The right to access personal data on a need-to-know basis.
- Guidance on advice and permissions to staff and learners concerning religious belief, including customs, festivals and holy days.
- A disability statement, which provides advice and guidance for disabled learners.
- Access to flexible working arrangements

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, diversity and inclusion 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 Directors 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 holds the right to request a standard of dress appropriate to circumstance and safety at work. The dress code takes into account the concerns of 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.

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.

#### 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 policy allows access to employment and training courses within the organisation that are 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 considered, we only ask about 'unspent' convictions as defined in the Rehabilitation of Offenders Act 1974 (updated March 2014). For further guidance on employment of ex-offenders, please refer to our DBS Vetting policy.

#### 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 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.

#### Cooperation by Staff and Learners

As part of CTG all staff and learners have a duty to cooperate and comply with any measure set out to improve or sustain the concept of equality, diversity and inclusion by:

- Being responsible for their own conduct and how this may affect others.
- Promoting equality and opportunity.
- Contributing to a safe and inclusive environment that celebrates diversity.
- Challenge discriminatory behavior by fellow staff members or Leaners and their employers, placement providers, outside contractors and other team members. It is the duty of all team members and students/apprentices to avoid unfair discriminatory practices.
- You must report bullying and harassment. You must not encourage or allow others by omission to carry out any discriminatory act.

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 subcontractor or a participant in one of the training programmes, you have an obligation to act in accordance with the ethos always set out in this policy.

#### Management Responsibility and Vicarious Liability

In order for the Equality, Diversity and Inclusion Policy to be fully effective, the responsibility for ensuring that its terms are adhered to will lie with the Managing Director. It is, however, the responsibility of each Manager and all other supervisory staff actively to promote equality of opportunity and inclusion within their own programmes and spheres of responsibility. It should not be overlooked that harassment can take many forms: age, religion, skin colour, sexual preference, disability – even dialect or accent – can all form the basis for unwanted aggression and attention. Victimisation in the widest sense of the word is also a form of harassment and those exposed to or subject to such action need protection.

The Company will inform its employees of their responsibilities and opportunities under the Equality

Act Legislation; will make sure that the Company's Equality, Diversity and Inclusion Policy is known to all staff and applicants; and will provide appropriate training.

The Company will take disciplinary action against employees who are found to infringe its Equality, Diversity and Inclusion Policy.

All queries and concerns about Equality and Diversity issues should be referred to the Group Managing Director or the E&D Champion. Please feel free to offer suggestions on the improvement of equality opportunities systems and procedures within this organisation.

This policy is supported by the following:

- Safeguarding Policy
- Compliments & Complaints Procedure
- Anti-Harassment Policy
- IAG & Admissions Policy
- Health & Safety Policy
- Academic/Disciplinary Procedures
- Academic Appeals Procedure
- DBS Vetting Policy incl. Ex-Offenders Guidance

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