EQUALITY, DIVERSITY AND INCLUSION POLICY 2026/27

Owner	Managing Director	**Approved by**	Board of Directors
Effective	1 August 2026	**Review due**	31 July 2027
Version	3.0	**Approval date**	30 July 2026

1. Policy commitment

Central Training Academy (CTA) will provide education, training, employment and services in ways that advance equality, remove avoidable barriers, value difference and prevent unlawful discrimination, harassment and victimisation. Equality is integrated with safeguarding, SEND, learner support, quality improvement, recruitment and employer engagement. CTA will focus on equitable participation and outcomes, not merely equal access.

2. Scope

This policy applies to learners, apprentices, applicants, employees, directors, volunteers, agency workers, employers, subcontractors, contractors, visitors and other people using CTA services. It applies across recruitment and admissions, curriculum, assessment, learner support, digital delivery, employment, workplaces, placements, facilities, complaints and procurement.

3. Legal, regulatory and funding framework

- Equality Act 2010, including Parts 3, 5 and 6 as applicable, the reasonable-adjustment duty and protection from discrimination, harassment and victimisation;
- Equality Act 2010 Public Sector Equality Duty where CTA is exercising a public function or is otherwise within scope;
- Equality and Human Rights Commission 2026 Code of Practice for Services, Public Functions and Associations, in force from 5 August 2026;
- EHRC Technical Guidance on Further and Higher Education where applicable to CTA education provision;
- Human Rights Act 1998; Data Protection Act 2018 and UK GDPR;
- Keeping Children Safe in Education 2026 and Working Together to Safeguard Children 2026 where safeguarding duties apply;
- Ofsted Further Education and Skills Inspection Toolkit and operating guidance used from September 2026;
- Apprenticeship Funding Rules 2026/27 and the October 2026 DWP guidance on supporting learners with learning difficulties and disabilities;
- DfE and relevant funding-authority conditions applying to 16 to 19, Adult Skills Fund and other funded provision.

4. Protected characteristics and other disadvantage

The Equality Act 2010 protects age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. The precise protection varies by Part of the Act and context. CTA will not assume every rule applies identically to employment, education and service provision. CTA also monitors non-protected factors that can affect access or outcomes, including care experience, caring responsibilities, socio-economic disadvantage, English as an additional

language, prior attainment, homelessness and digital exclusion. These factors do not become protected characteristics merely because CTA monitors them.

5. Forms of unlawful conduct

- direct discrimination and, where the Act permits, age-related justification;
- indirect discrimination where a provision, criterion or practice creates particular disadvantage and cannot be objectively justified;
- discrimination arising from disability;
- failure to make reasonable adjustments;
- harassment connected with a protected characteristic where legally covered;
- victimisation because someone has done or may do a protected act;
- discrimination by association or perception where recognised by law.

Positive action may be used where Equality Act conditions are met. Positive action is not positive discrimination and must be evidence-based, proportionate and documented.

6. Disability and reasonable adjustments

CTA has an anticipatory duty to consider barriers for disabled learners and service users and will make reasonable adjustments so that disabled people are not placed at a substantial disadvantage. Adjustments may include accessible materials, assistive technology, communication support, changed teaching or assessment practice, physical access arrangements, additional time, modified timetables and support plans. CTA will not require a medical diagnosis where sufficient evidence exists to identify a barrier and agree a reasonable adjustment, although particular funding or assessment arrangements may require specified evidence.

For apprenticeships and apprenticeship units, initial assessment must consider learning difficulties and disabilities and the support needed for active learning, English and maths and assessment. Learning support funding may be claimed only where the applicable funding rules and evidence requirements are met. The legal duty to make a reasonable adjustment is not dependent on whether funding can be claimed.

7. Admissions, recruitment and initial assessment

Admissions decisions will use published, relevant and proportionate criteria. CTA will identify support needs early, explain available adjustments and avoid screening out applicants because support may be required. Where a programme has genuine occupational, competence, safety or funding requirements, decisions will be individually assessed and documented rather than based on assumptions about a protected characteristic or diagnosis.

8. Curriculum, teaching, assessment and learner experience

- curriculum content and resources will represent people fairly and challenge discriminatory stereotypes;
- teaching will use inclusive methods and accessible resources while maintaining required occupational and assessment standards;
- English and maths, digital learning and enrichment will be planned to reduce avoidable participation barriers;
- assessment adjustments will be arranged in accordance with awarding-organisation rules and equality law;
- learners will be taught respectful behaviour, equality, British values, healthy relationships and how to report discrimination or harassment;
- learner voice will be analysed across relevant groups, not treated as a single-provider average.

9. Safeguarding, bullying and harassment

Discrimination and identity-based bullying can create or increase safeguarding risk. Staff must report safeguarding concerns to the DSL under CTA's Safeguarding and Child Protection Policy. CTA will respond to sexual harassment, racist abuse, disability-related harassment, homophobic, biphobic or transphobic abuse, religious hatred and other discriminatory conduct through safeguarding, behaviour, complaints or disciplinary routes as appropriate. A safeguarding referral does not replace action to address discriminatory practice.

10. Apprenticeships, employers and work placements

CTA will set clear equality expectations with employers and placement hosts, including accessible recruitment, fair treatment, reasonable adjustments, reporting routes and protection from harassment. Progress reviews will provide apprentices with opportunities to raise workplace concerns privately. CTA will support employers to understand adjustments and will intervene where discriminatory practice affects training or safety. Serious or unresolved concerns may lead to removal from a placement or other contractual action.

11. Staff employment and development

CTA employment practices will apply objective recruitment criteria, reasonable adjustments, fair access to development, equal-treatment principles and lawful pay and progression arrangements. Managers must address discriminatory conduct and consider adjustment needs in attendance, capability, performance and organisational-change processes. Equality training will be reinforced through management practice and case learning rather than relying solely on annual e-learning.

12. Data, equality analysis and privacy

CTA will collect equality information only where there is a clear purpose and lawful basis. Special category data will have an Article 9 condition and additional safeguards. Published or Board-level information will be anonymised or aggregated where necessary to prevent identification. Equality impact assessment will be proportionate to the decision and used for material changes to policy, curriculum, delivery models, premises or learner services.

13. Monitoring outcomes and closing gaps

- applications, offers, starts and withdrawals;
- retention, participation, attendance or engagement and achievement;
- progression and destinations;
- reasonable-adjustment requests, implementation and review;
- complaints, safeguarding, bullying and harassment themes;
- apprenticeship breaks, progress and completion where relevant;
- learner experience and employer feedback.

Data will be segmented where numbers allow safe and meaningful analysis. CTA will investigate material gaps rather than assuming difference proves discrimination. Improvement actions will have named owners, timescales, measures and review points. The Board will receive equality assurance at least termly, including progress against significant gaps and overdue actions.

14. Public Sector Equality Duty

Where CTA is subject to the Public Sector Equality Duty for a function, decision or service, CTA will give due regard to eliminating unlawful discrimination, advancing equality of opportunity and fostering good relations. Due regard will be exercised while decisions

are being developed, with proportionate evidence retained. CTA will not state that the PSED applies to every aspect of its activity unless the legal basis for that conclusion is established.

15. Concerns, complaints and remedies

Equality concerns may be raised verbally or in writing through CTA's Complaints and Compliments Procedure, safeguarding route, learner support arrangements or staff grievance and whistleblowing procedures. CTA will make reasonable adjustments to the reporting process and protect people from victimisation. Outcomes may include support, apology, correction, adjustment, training, restorative action, disciplinary or contractual action and systemic improvement. Serious concerns may also be raised with the Equality Advisory Support Service, EHRC, an awarding organisation, funding authority or other body where within its remit.

16. Responsibilities

Role	Responsibility
Board	Approve policy, scrutinise equality risks/outcomes and ensure significant gaps are addressed.
Managing Director / senior leaders	Set expectations, allocate resources and ensure equality is integrated into strategy and decision-making.
Director of Quality	Coordinate equality assurance, data analysis, improvement and regulatory updates.
Managers and tutors	Implement adjustments, inclusive practice, challenge discrimination and escalate concerns.
All staff	Treat people fairly, complete relevant training, implement agreed adjustments and report concerns.
Employers/subcontractors	Meet contractual equality duties, support reasonable adjustments and cooperate with CTA assurance.
Learners/apprentices	Treat others respectfully and report discrimination, harassment or barriers to participation.

17. Review and related policies

This policy is reviewed annually and sooner following material legislative, regulatory or funding change, inspection findings or evidence of significant inequality. Related documents include Safeguarding and Child Protection; SEND and Support Planning; Complaints and Compliments; Prevent; Admissions and IAG; Learner Behaviour; Anti-Harassment; Data Protection; Recruitment; Subcontracting; Employer and Placement Assurance policies and procedures.

Appendix 1: 2026/27 regulatory update

Area	Finding	2026/27 change
EHRC Code 2026	A new Code of Practice for services, public functions and associations came into force on 5 August 2026, replacing the 2011 Code.	Added explicit coverage of services/public functions, disability discrimination, adjustments, positive action and context-specific duties.
Ofsted 2026	FE and skills inspection guidance was renewed and updated for use from September 2026, with inclusion evaluated at whole-provider level.	Added outcome-gap analysis, learner voice, leadership assurance and evidence of impact.
KCSIE 2026	Current statutory safeguarding guidance is in force from September 2026.	Strengthened identity-based harm and safeguarding interface.
Apprenticeships	Responsibility for apprenticeship funding rules moved to DWP; 2026/27 rules and October 2026 learning-difficulty/disability guidance apply.	Updated initial assessment, reasonable adjustments, learning support funding and employer responsibilities.
Monitoring	The previous policy listed achievement, retention and complaints only.	Expanded measures and required named, time-bound action on material gaps.

Appendix 2: Approval record

Board approval	30 July 2026
Next review	July 2027