

Equality & Diversity Policy



This policy applies to all Projecting Success Ltd employees and associates (including apprentices)

Projecting Success is committed to being an equal opportunities employer and ensuring that all employees, job applicants, customers, apprentices, and other people with whom we deal with are treated fairly and are not subjected to unfair or unlawful discrimination. This policy sets out the way in which the company aims to manage equal opportunity.

Our policy is designed to ensure that all current and potential employees are offered the same opportunities regardless of their race, religion or belief, nationality, ethnic origin, age, sex, sexual orientation, marital status, domestic circumstances, disability or any other characteristic unrelated to the performance of the job. Projecting Success seeks to ensure that no one suffers, either directly or indirectly, as a result of discrimination.

Projecting Success recognises that an effective Equality and Diversity Policy will help all employees to develop to their full potential, which is clearly in the best interests of both our employees and our business. Projecting Success aims to ensure that we not only observe the relevant legislation but also do whatever is necessary to provide genuine equality of opportunity for all.

Projecting Success expects all employees/associates to be treated and to treat others with respect and follow our ethos of 'equal opportunities for all'. The aim is to provide a working environment free from harassment, intimidation, or discrimination in any form that may affect the dignity of the individual.

Projecting Success further recognises the benefits of employing individuals from a range of backgrounds as this creates a workforce where creativity and valuing differences in others can thrive. The company values the wealth of experience within the community in which we operate and aspire to have a workforce that reflects this.

These values are also reflected in our Learning and Development programmes where the company is committed to ensuring that all employees/apprentices with whom we work with are treated fairly and given equal opportunities to access all programmes, education and training opportunities to develop their full potential.

The overall responsibility for implementing and monitoring the effectiveness of this policy rests with the Senior Leadership Team of Projecting Success. All employees and apprentices irrespective of their role or seniority, will be given guidance through thorough induction training, as to their responsibility and role in promoting equality of opportunity and not discriminating unfairly or harassing colleagues or job applicants, nor encouraging others to do so or tolerating such behaviour. Disciplinary action, including dismissal, may be taken against any employee found guilty of unfair discrimination or harassment.

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Projecting Success accepts and promotes the statutory requirements laid down in the *Equality Act 2010*, the *Fair Employment Act (Northern Ireland)*, *Employment Equality (Age) regulations 2006*, *Employment Equality (sexual orientation) Regulations 2003*, *Human Rights Act 1998*.

Implementation, monitoring and review of this policy

This policy will take effect from December 2018. The Senior Leadership Team will have overall responsibility for implementing and monitoring this policy, which will be reviewed on a regular basis following its implementation (at least annually) and additionally whenever there are relevant changes in legislation or to our working practices.

Any queries or comments about this policy should be addressed to the Projecting Success Learning and Development Manager.

This policy applies to all employees and associates.

Purpose

The aim of this document is to explain in a clear and concise manner how the company intends to implement, monitor, and review its Equality and Diversity Policy.

Additionally, the procedure for monitoring and reviewing the issue of “equality” will be explained along with clear guidance on how to invoke the complaint procedure in the event of a grievance arising.

Responsibilities

CEO

The CEO has overall responsibility for the implementation of the policy. In particular, he is responsible for ensuring that the policy is widely communicated and that its effectiveness is monitored. Martin Paver will ensure that they and their staff/associates operate within the policy and arrangements and that all reasonable and practical steps are taken to avoid discrimination.

Furthermore, he will be responsible for monitoring the operation of the policy in respect of employees and job applicants, including periodic company audits.

Projecting Success Head of HR, Learning & Development

The Head of HR, Learning and Development is accountable to the CEO for the implementation and monitoring of the policy within the area of specified responsibility.

Each manager will ensure:

1. All their staff and associates are aware of the policy, the arrangements, and the reasons for the policy

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2. Grievances concerning discrimination are dealt with properly, fairly, and as quickly as possible
3. Proper records are maintained
4. Apprentices are given the same and equal opportunities to enroll and succeed in their chosen pathway and understand their rights for equal opportunities from at the beginning and throughout their learner journey.
5. All Apprentices have access to relevant policies and procedures which are detailed in the Apprentice Handbook and also embedded in all teaching, learning and assessment sessions.

Employees/Associates

Whilst the responsibility for ensuring that there are no unlawful discrimination rests with Senior Management, the attitudes of employees/associates are crucial to the successful operation of fair employment practices. In particular, all employees/associates should:

1. Comply with the company's policy and arrangements.
2. Not discriminate in their day-to-day activities or induce others to do so.
3. Not victimise, harass, or intimidate other staff or groups on the grounds specified in the policy statement.
4. Inform their manager if they become aware of any discriminatory practice.

Similarly, Company associates working in other host premises will be expected to follow the host employers Equality and Diversity Policy.

Definitions

Single Equality Scheme

The Single Equality Scheme includes four key objectives for agencies to:

1. Use relationship management to advance equality
2. Build equality into decisions and activities
3. Support equality self-improvement and promote good practice
4. Develop a fair, inclusive and diverse working environment for staff

The scheme covers all the protected characteristics in the Equality Act 2010. It covers both staff and the learners that the agency funds.

Equality

Equality is about making sure people are treated fairly and given fair chances. Equality is not about treating everyone in the same way, but it recognises that their needs are met in different ways. Equality focuses on those areas covered by the law, namely the key areas of race, gender, disability, religion or belief, sexual orientation, and age.

People must not be unfairly discriminated against because of any of these factors and we must all

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contribute to creating a positive workplace environment where discriminatory practices no longer happen.

Diversity

Diversity is about valuing individual differences. So 'diversity' is more than an alternative word for equality. A diversity policy aims to recognise value and manage difference to enable all employees to contribute and realise their full potential. Diversity challenges us to recognise and value all sorts of differences in order to make Projecting Success a better place for everyone to work.

Projecting Success is committed to creating a culture in which diversity and equality of opportunity are promoted actively and in which discrimination is not tolerated.

Where discrimination against any person or group is referred to it shall be deemed to be potential discrimination within any of the categories listed in the policy statement. Two types of discrimination are covered by statute - direct and indirect.

Discrimination

To discriminate against someone is to treat someone less favourably because of their race, age, sexual orientation, religious beliefs, gender, or disability.

Protected Characteristics

These are the grounds upon which discrimination is unlawful. The Equality Act 2010 sets out different types of discrimination. These are:

Direct Discrimination

1. Direct discrimination occurs when a person or group is treated less favourably than others.
2. Segregating a person or group based on their race, sex, age, or disability is unlawful. It also is unlawful for an employer to discriminate against a job applicant whose conviction is spent.

Associative Discrimination

Associative discrimination occurs when someone is directly discriminated against because they are associated with another person who possesses a Protected Characteristic.

Discrimination by perception

Discrimination by perception occurs when someone is directly discriminated against because others think that they possess a particular Protected Characteristic. They do not necessarily have to possess the characteristic, just be perceived to have the characteristic.

Indirect Discrimination

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1. Indirect discrimination occurs when a condition or requirement is imposed which, although applied equally to all individuals or groups, is such that:
2. The proportion of persons of a group who can comply with it is significantly smaller than the proportion of persons not of that group who can comply with it.
3. The employer cannot show it as being justifiable based upon the needs of the job.
4. It is to the detriment of the individuals concerned because they cannot reasonably comply with it.

For example:

1. A dress policy which prevents women wearing trousers discriminates against women of a particular race or religion.
2. A higher language standard than is actually needed to do the job discriminates on the grounds of nationality/race.
3. A training policy, which excludes part-time staff, may discriminate against women, who fill the majority of part-time jobs.

Harassment

Harassment includes behaviour that is offensive, frightening or in any way distressing. It may be intentional bullying, which is obvious or violent, but it can also be unintentional and subtle. It may be about the individual's age or sexual orientation. It may not be targeted at an individual(s) but consist of a general culture which, for instance, appears to tolerate the telling of sexist jokes. The employer may be held responsible for the actions of employees, as well as the employee themselves.

Harassment by a third party

Harassment by a third party occurs when an employer subjecting their employee to harassment where:

1. A third party subjects the employee to harassment in the course of the employee's employment
2. The employer fails to take reasonably practicable steps to protect their employee from that third-party harassment
3. The harassment is known to have occurred on at least two previous occasions

Victimisation

Victimisation is when an individual is treated detrimentally because they have made a complaint or intend to make a complaint about discrimination or harassment or have given evidence or intend to give evidence relating to a complaint about discrimination or harassment.

Discrimination arising from disability

Treating disabled people unfavourably when using their services for a reason connected with

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disability

Rights of Disabled People

Projecting Success attaches particular importance to the needs of disabled people.

Under the terms of this policy, managers are required to:

1. Make reasonable adjustments to maintain the services of an employee/associate, client or apprentice who becomes disabled, for example, training, provision of special equipment, reduced working hours.
2. Include disabled people in training/development programmes.
3. Give full and proper consideration to disabled people who apply for jobs, making reasonable adjustments for their particular aptitudes and abilities to allow them to be able to do the job.

Relevant Legislation

There are several pieces of legislation that combat discrimination and promote equal opportunities and diversity. Under the Equality Act 2010 the headings of age, disability, race, religion or belief, gender, sexual orientation, gender reassignment, marriage/civil partnership, pregnancy, and maternity are now known as Protected Characteristics. Projecting Success will work to a Single Equality Scheme (see Definitions for more detail) which incorporates all of its proposed actions in relation to all Protected Characteristics. We will also consider issues of socio-economic inequality and class that are not required under the Act. This Scheme will be monitored and reviewed annually. Projecting Success will also adhere to its duties under all relevant legislation including but not limited to the following:

1. Equality Act 2010
2. Equality Act 2006
3. Equal Pay Act 1976
4. Sex Discrimination Act 1975
5. Race Relations Act 1976 and Amendment 2000
6. The Race Relations Act 1976 (Amendment) Regulations 2003
7. Disability Discrimination Act 1995
8. Employment Act 2002
9. The Employment Equality (Age) Regulations 2003
10. Employment Equality (Sexual Orientation) Regulations 2003
11. Employment Equality (Religion or Belief) Regulations 2003
12. The statutory special educational needs and disability (SEND) system for children and young people aged 0 to 25, 2014

Systems and Procedures

This section provides information to illustrate and communicate how equality is integrated within

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business systems, processes, and activities through the following areas:

1. Recruitment.
2. Learning & Development.
3. Terms and Conditions.

Recruitment (Employees)

The recruitment process within the company includes:

a) Job Analysis

This objective process identifies the knowledge, skills and abilities required to perform a job to an acceptable standard, which then leads to the production of a Person Specification, Job Description and Skills Profile that contains fair, relevant, and justifiable criteria.

b) Advertising

The purpose of advertising is to attract applications from all suitable qualified and experienced people.

c) Application Forms

By using such forms, the company can obtain standard information from all applicants and then use this to assess each candidate against the criteria contained in the Person Specification and Job Description. The form also allows the company to monitor all applicants on grounds of ethnic origin, gender, age, and marital status and thereby identify if a need exists for positive action.

d) Interview/Assessment

All interviews/assessments are carried out by trained personnel who:

1. Take a fair and unbiased approach to assess each person against specific criteria.
2. Ask relevant questions which relate to the vacancy and are non-discriminatory.
3. Are aware of legal obligations.
4. Support and promote the Equality and Diversity Policy.
5. Work together in interviewing/assessing individuals to ensure a fair and objective process is maintained.

e) Induction

The purpose of this process is to ensure that all new employees or associates receive a standard induction to their job role, the organisation, their colleagues, products, services, company policies and procedures to facilitate their integration into the organisation and its culture. Similarly, any person who receives promotion should receive an induction to their new role. This process should identify any training needs, which are to be addressed in order for the individual to perform

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effectively.

f) Exit Interviews

The purpose of this is to establish why the individual is leaving the organisation. It is necessary to identify whether the individual has decided to leave because of less favourable treatment in any respect.

Recruitment of Apprentices and working with employers

a) Initial contact

Meeting with employer to determine who they want to put forward for the Apprenticeship, delivery schedule and to discuss LEVY / NON LEVY funding. And will ensure that the employer is involved throughout the recruitment process.

b) Eligibility and Prior screening

Learners complete eligibility form to determine eligibility for the Apprenticeship and to determine prior learning and where applicable reduce training costs.

c) Individual learning plan

Once apprentice is eligible for the Apprenticeship, Initial assessment begins with the completion of the Individual learning plan, commitment statement, apprenticeship agreement, all relevant documentation, delivery schedule and registration to One file the apprentices e – portfolio.

d) Apprentice onboarding and Day one learning

Introduction to cohort, trainer, course content in more detail, activities on BV, Prevent and Safeguarding.

Where an apprentice is not eligible for funding additional conversations will take place to offer CIAG and sign post other learning pathways.

Learning & Development

Projecting Success is strongly committed to providing learning and development opportunities to all full and part time employees/associates and Apprentices. Therefore, the company is committed to providing and ensuring equal access to training and development opportunities through the following measures:

1. Providing a comprehensive induction training programme, to include Equal Opportunity Awareness Training.
2. Undertaking regular performance reviews, which will identify any individual training needs in the form of a Personal Development Plan.

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3. Providing guidance and information on how to access training/development events.
4. Using methods of flexible, open and distance learning to meet the identified needs of people who are unable to access some formal training events.
5. Providing financial support and study leave where appropriate to Projecting Success employees, to encourage the take up of training and continuous development activities.
6. Providing opportunities for regular updating of skills to ensure competence is maintained and allow any skill/knowledge gaps to be dealt with e.g. arising from a career break.
7. To accommodate all special needs cases.

During their work all associates are required to ensure that they use training/learning materials and methods which combat stereotyping and discrimination and promote the issue of equality.

Terms and Conditions

In order to ensure fair and equitable treatment of all employees and associates the following criteria is applied:

1. All staff will receive an annual pay review.
2. Individual performance will be considered as part of the pay review process.
3. Relevant legislation will be considered and adhered to in all pay review situations.

Monitoring and Review

Projecting Success deems it appropriate to state its intention not to discriminate and assumes that this will be translated into practice consistently across the company as a whole. Accordingly, the Company Equality Diversity Policy and Strategy Statement will be reviewed annually, and its implementation monitored on a twice-yearly basis. As part of the review process, the company will consult with employees, associates and all other stakeholders to measure the effectiveness of the policy and arrangements. This is done through employer and learner feedback, programme reviews and meetings.

The system will involve the routine collection and analysis of information on employees and associates by gender, age, marital status, ethnic origin, qualifications, grade, and length of service in current grade. Information regarding the number of staff who are registered as disabled will be maintained.

The information collected for monitoring purposes will be treated as confidential and it will not be used for any other purpose.

There will also be regular assessments to measure the extent to which recruitment to first appointment, internal promotion and access to training/development opportunities affect equal opportunities for all groups.

As suggested by the Equal Opportunities Commission, the company will endeavour to identify where and why barriers to equality have arisen and take appropriate corrective action as necessary.

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Managers are responsible for conducting annual reviews of all the areas mentioned and may use any of the following methods - surveys, questionnaires, interviews, individual and team discussion and analysis of any of the following data:

1. Performance review records
2. Work force composition
3. Salary levels
4. Grievance and disciplinary records
5. Training records
6. Turnover rates
7. Exit information
8. Evaluation forms

Based upon the results of the review exercise the appropriate form of corrective action would then be undertaken.

Complaints Procedure

Employees/associates have a right to pursue a complaint concerning discrimination or victimisation via the Company Grievance Procedures

Discrimination and victimisation will be treated as disciplinary offences, and they will be dealt with under the Company Disciplinary Procedure.

To whom it may concern:

I can confirm as a member of the Senior Leadership Team that I fully agree with the content of this policy as part of the annual review.

Name: Vicky Emerson Position: Head of Human Resources, Learning and development



Signature:

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