

EQUALITY, DIVERSITY AND INCLUSION POLICY

1 – Policy Overview

1.1 – Policy Statement

This policy applies to all Projecting Success Ltd apprentices, learners, employees and stakeholders.

Projecting Success is committed to being an equal opportunities employer and ensuring that all employees, job applicants, customers, apprentices, learners, stakeholders 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. It is important to note that all past, current, and prospective apprentices, learners, employees and stakeholders are covered by the Equality Act.

Our policy is designed to ensure that all past, current and prospective apprentices, learners, employees and stakeholders 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. 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, Diversity and Inclusion Policy will help everyone to develop to their full potential, which is clearly in the best interests of all parties 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 everyone 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 and learning 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 apprentices, learners, employees and stakeholders 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 Chief Executive Officer of Projecting Success. All apprentices, learners, employees and stakeholders 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.

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.

1.2 - Implementation, Monitoring and Review

This policy will take effect from December 2018. The CEO 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 CEO.

This policy applies to all employees and associates.

1.3 – Policy 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, Diversity and Inclusion 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.

2 - Responsibilities

2.1 – CEO's

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.

2.2 - Director of HR, Learning & Development

The Director 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.
2. Grievances concerning discrimination are dealt with properly, fairly, and as quickly as possible.
3. Proper records are maintained.
4. Apprentices and learners are given the same and equal opportunities to enrol and succeed in their chosen pathway and understand their rights for equal opportunities from at the beginning and throughout their apprentice/learning 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.

2.3 – Employees & Associates

Whilst the responsibility for ensuring that there are no unlawful discrimination rests with Senior Management, the attitudes of employees and associates are crucial to the successful operation of fair employment practices. In particular, all employees and 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.
5. Promoting an inclusive environment that meets the needs of all apprentices, irrespective of age, disability, gender reassignment, race, religion or belief, sex or sexual orientation, relationship status or pregnancy

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

3 - Definitions

3.1 - 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 apprentices that the agency funds.

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

3.3 - Diversity

Diversity refers to respecting, valuing and celebrating the differences between people. These differences are the things that make us unique, such as our abilities and personality traits, as well as the things that shape our identity, such as our age, sex, race, gender, sexual orientation or religious beliefs. 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.

3.4 – Inclusion

Inclusion is about embracing all people in the communities where we work, study or live, and encouraging and valuing their unique contribution to society. **Inclusive practices** aim to provide equal access and opportunities for everyone, and work towards removing discrimination and intolerance.

3.5 - Discrimination

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

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

3.5.1 – Direct Discrimination

Direct discrimination occurs when a person or group is treated less favourably than others. 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.

3.5.1.1 - Associative Discrimination

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

3.5.1.2 - 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.

3.5.1.3 - Antisemitism

The definition of antisemitism from the International Holocaust Remembrance Alliance's (IHRA) is: "Antisemitism is a certain perception of Jews, which may be expressed as hatred toward Jews. Rhetorical and physical manifestations of antisemitism are directed toward Jewish or non-Jewish individuals and/or their property, toward Jewish community institutions and religious facilities." Projecting Success adopts a zero-tolerance policy towards antisemitic behaviours or actions.

3.5.1.4 – Discrimination Arising from a Disability

This form of discrimination comes from treating disabled people unfavourably when using their services for a reason connected with disability.

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

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

- 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.
- Include disabled people in training/development programmes.
- 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.

3.5.2 - Indirect Discrimination

Indirect discrimination occurs when a condition or requirement is imposed which, although applied equally to all individuals or groups, is such that:

- 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.
- The employer cannot show it as being justifiable based upon the needs of the job.

- It is to the detriment of the individuals concerned because they cannot reasonably comply with it.

For example:

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

3.6 - 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.

3.6.1 - Harassment by a Third Party

Harassment by a third party occurs when:

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

3.7 - 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.

4 - 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

5 - Systems and Procedures

This section provides information to illustrate and communicate how equality is integrated within business systems, processes, and activities through the following areas:

1. Recruitment

2. Learning & Development
3. Terms and Conditions

5.1 - Recruitment (Employees)

The Safer Recruitment process within the company includes:

5.1.1 - Job Analysis and Job Description

Before initiating the recruitment process, Projecting Success will undertake a job analysis to identify the essential duties, responsibilities, and qualifications required for the role. This analysis will inform the creation of a job description, which will be used to advertise the vacancy.

5.1.2 - Advertising

All job vacancies will be advertised on the Projecting Success website, as well as on relevant job boards and publications. The advertisement will include information about the role, the essential criteria for the role, and the application process.

5.1.3 - Application Process

Applicants will be required to submit a completed application form and CV. The application form will contain questions about the applicant's eligibility to work, relevant qualifications and experience, and references.

5.1.4 - References

In order to support and make informed decisions Projecting Success will:

- Not accept open references.
- Not rely on applicants to obtain their references.
- Ensure that a reference is obtained from the current employer by a person with appropriate authority.
- Obtain relevant verification from the last employer should the candidate currently be unemployed.
- If not currently working with children obtain a reference from the last relevant employer.
- Ensure that any information is verified with the person providing the reference.
- Ensure that electronic references are legitimate.

- Ensure that any content which is vague or insufficient is clarified with the referee.
- Ensure that the reference is checked against the application form and any anomalies are investigated with the candidate.
- Ensure that the reason for leaving their most recent employer is established.
- Ensure that all checks are completed and any concerns resolved before appointment confirmed.
- All references will be logged against a Reference Checklist and any discrepancy reported to the Director of HR, Learning and Development.

5.1.5 - Shortlisting

All applications will be assessed against the essential criteria outlined in the job description. A shortlist of candidates will be created based on the criteria.

5.1.6 - Due Diligence

Online searches will be conducted to obtain publicly available information as part of due diligence on shortlisted candidates, in line with Data Protection and UK GDPR.

5.1.7 - Interviewing and Assessment

Candidates may be screened in an initial phase by a member of the team who has completed Safer Recruitment Training if applicant numbers are high. All shortlisted candidates will be invited for an interview. If pre-screening has not taken place the interview panel will consist of at least two individuals, one of whom will have completed Safer Recruitment training. All interviews will be conducted in a fair and consistent manner, and all candidates will be asked the same questions. The interview panel will also undertake an assessment of the candidate's suitability for the role, based on the job-related criteria.

5.1.8 - Offer of Employment

If a candidate is successful in the interview and assessment, Projecting Success will make a conditional offer of employment. The offer will be conditional on the candidate completing satisfactory background checks; including an enhanced Disclosure and Barring Service (DBS) check and providing two satisfactory references which specifically cover Safeguarding and Child Protection

concerns, right to work checks will be completed via TrustID, a Self-Declaration form will be requested, and copies of relevant professional qualifications will be obtained.

5.1.9 - Disclosure & Barring Processes

All candidates will be advised that their recruitment is subject to a satisfactory enhanced DBS check. Successful candidates not engaging in regulated activity will require an enhanced check, but do not require a barred list check. The check will be carried out using the uCheck portal. The enhanced DBS check gives details of any previous convictions or cautions, we do review these as in certain cases, e.g., timescales, spent convictions and seriousness of the conviction will risk assess the individual to see suitability to work for us.

We ensure our partners undergo the same checking requirements, which is monitored during regular stakeholder meetings.

Re-checks on staff will be completed every 3 years. All checks are undertaken at Projecting Success and coordinated by our L&D Team, using the uCheck portal. On re-check staff will be encouraged to subscribe to the [DBS Update Service - GOV.UK \(www.gov.uk\)](https://www.gov.uk/dbupdate).

5.1.10 - Concerns Raised

If during the recruitment process any concerns are raised, decisions on whether to continue with or revoke an employment offer will be made on a case-by-case basis and a risk assessment will be carried by HR and the Senior Leadership Team. Risks will be determined against a “High/Medium/Low” matrix against factors such as financial, safeguarding and reputational, and final decisions will be made by the Senior Leadership Team.

5.1.11 - Induction

All new employees will receive an induction that includes information about the organisation's policies and procedures, including this Recruitment and Selection Policy.

5.1.12 - Records

Projecting Success will keep accurate and up-to-date records of all recruitment and selection decisions, including applications, shortlisting decisions, interview notes, and reference checks.

5.1.13 - Training

Senior staff will receive training in the application of this Policy to ensure that they are aware of its contents and provisions.

5.1.14 - Monitoring

We will maintain and review monitoring data for the workforce, in order to monitor the progress of this Policy. Monitoring may involve:

- The collection and classification of equality data of applicants and current employees.
- Recording recruitment, training and promotional records of all employees, the decisions reached and the reason for those decisions.
- The results of any monitoring procedure will be reviewed at regular intervals to assess the effectiveness of the implementation of this Policy. Consideration will be given, if necessary, to adjusting this Policy to develop a more diverse workforce.
- All employees will be encouraged to register to the GOV DBS Update Service so that DBS checks can be monitored on an annual basis using. New checks will be made every 3 years for existing staff members.

5.1.14 - 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.

5.1.15 - Recruitment of Apprentices and Working with Employers:

- 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.
- Eligibility and Prior Screening - Apprentices' complete eligibility form to determine eligibility for the Apprenticeship and to determine prior learning and where applicable reduce training costs.
- Individual training plan - Once apprentice is eligible for the Apprenticeship, Initial assessment begins with the completion of the Individual training plan, a documented Initial Advice and Guidance session with tutor and line manager, commitment to learning, apprenticeship

agreement, all relevant documentation, delivery schedule and registration to One file the apprentices e – portfolio.

- Apprentice onboarding and day one learning - Introduction to cohort, trainer, course content in more detail, activities on British Values, Prevent, Safeguarding and Equality, Diversity and Inclusion. Where an apprentice is not eligible for funding additional conversations will take place to offer CIAG and sign post other learning pathways.

5.2 - Learning & Development

Projecting Success is strongly committed to providing learning and development opportunities to all apprentices, learners, employees and stakeholders. Therefore, the company is committed to providing and ensuring equal access to training and development opportunities through the following measures:

- Providing a comprehensive induction training programme, to include Equality, Diversity and Inclusion Training.
- Undertaking regular performance reviews, which will identify any individual training needs in the form of a Personal Development Plan.
- Providing guidance and information on how to access training/development events.
- Using methods of flexible, open and distance learning to meet the identified needs of people who are unable to access some formal training events.
- Providing financial support and study leave where appropriate to Projecting Success employees, to encourage the take up of training and continuous development activities.
- 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.
- 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.

5.3 - Terms and Conditions

In order to ensure fair and equitable treatment of all apprentices, learners, employees and stakeholders the following criteria is applied:

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

6 - 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. Accordingly, the Company Equality Diversity and Inclusion Policy and Strategy Statement will be reviewed annually, and its implementation monitored. 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 apprentice 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.

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:

- Performance review records
- Work force composition
- Salary levels
- Grievance and disciplinary records

- Training records
- Turnover rates
- Exit information
- Evaluation forms

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


7 - Complaints Procedure

Employees/associates have a right to pursue a complaint concerning discrimination or victimisation via the Company Grievance Procedures as outlined in the Company handbook.

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

8 – Further Reading

[Equality Act 2010 Technical Guidance on Further and Higher Education \(equalityhumanrights.com\)](http://equalityhumanrights.com)

Version History				
Date	Version	Details of Change	Revision By	QA
24/03/2023	5	<ul style="list-style-type: none"> - Improved Layout and Section Titles - Added Version Control - Added Section 3.4 - Added Section 3.5.1.3 - Updated Policy Title - Added Section 8 	Sam Barnfield	
17/02/23	4	<ul style="list-style-type: none"> - Updated safer recruitment process 	Sam Barnfield	