

# EQUITY, DIVERSITY AND INCLUSION POLICY

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**Approved by:** Davies Learning Solutions Board

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## Change History

Version	Date	Author	Description of change
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V2	06/12/2021	Matt Edwards	Updated
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## 1. Introduction

Davies Learning Solutions (DLS) wishes to secure genuine equality of opportunity, whether required by legislation or not, in all aspects of its activities as an employer, training provider and a funding partner to our Subcontractor. To this end, DLS will take all reasonable and practicable steps to ensure that there is no discrimination against any individual or individuals, including colleagues, directors, beneficiaries, apprentices, sub-contractors, and customers.

## 2. Policy Principles

DLS value the differences and benefits that a diverse workforce brings to the business. The company will not discriminate on the grounds of any differentiating factor including age, disability, gender reassignment, marriage and civil partnership, race, including colour, nationality and ethnic or national origins, religion or belief, gender, sexual orientation, body shape or neurodiversity.

Our commitments that underpin these guiding principles are;

- We will take measures to ensure there is an inclusive and welcoming working environment with zero tolerance to unlawful and unfair discrimination or treatment and where everyone can achieve their potential.
- To reflect and promote this in our policies, procedures and working practices.
- We will ensure there is suitable provision of advice, information and training to support and educate our employees and anyone working on behalf of the company to achieve an equitable, diverse and inclusive working environment and to understand all legislative and regulatory obligations.
- In all dealings with others, including our clients and third parties, we will look to promote the principles of equality, diversity and inclusion and expect all employees and others working on behalf of the company to not only comply with the principles of the policy but take personal responsibility for the promotion and advancement of it.
- To ensure appropriate action is taken when a reported act or behaviour is proven and for everyone to be taken seriously if a formal or informal complaint of discrimination is raised with regard to behaviour or a working practice.
- To ensure apprentices will be supported in their learning to allow them to succeed in line with peers and progression to new opportunities.

The policy can be made available in alternative formats on request and will be reviewed yearly or on updates to legislation.

The overall purpose of this policy is to abide by the Equality Act 2010 and to ensure that DLS is a place where learning and work exists in an environment that promotes equality of opportunity, celebrates diversity, and allows everyone to achieve their full potential. To support this, DLS have created a 2-pillar strategic focus and vision statement to set out our long terms aims.

Strategic focus – Visibility and Accountability

Vision Statement – Creating a pioneering Equity, Diversity & Inclusion environment within professional education, to inspire and empower individuals.

### 3. Policy

The Company Values will embed equality and diversity in their implementation, namely:

- Do the right thing – we endeavor to be open, honest, and fair in our dealings with apprentices, employers, partners, and stakeholders
- Apprentices are at the center of everything we do, and we are driven by the desire to provide life- changing opportunities for each and every one of them
- Continuous improvement – we are committed to continually exploring ways to improve the services we offer for the benefit of our apprentices, partners, and employers
- Develop and empower our staff – we are passionate about supporting staff at all levels so that they can realise their full potential and progress

The Company actively promotes British Values throughout delivery, using the following key themes:

- Democracy
- The rule of law
- Individual liberty
- Respect and tolerance

As well as actively promoting British Values we would also actively challenge apprentices, employers, staff, or parents expressing opinions contrary to fundamental British Values, including ‘extremist’ views of any variety. We do this through embedding wider curriculum learning within apprentice learning plans.

Objective of the policy are to:

- Regularly report to the Board and Senior Management Team on equality and diversity matters and the performance and participation of different groups of apprentices
- Regularly review the policy and procedures that promote and protect equality and diversity
- Make Subcontractor Partners aware of their personal obligations to avoid discrimination, in accordance with the policy
- Organise or access opportunities that foster a culture of equality for all
- Monitor procedures and activities to ensure the effectiveness of DLS’s approach
- Account for the needs of all, particularly those with protected characteristics
- Take positive action to address unjustified disparities in training and / or employment

### 4. Statutory Acts

There are several statutory and other provisions relating to Equality & Diversity and these are enveloped in one Single Equality Bill (October 2010). These include:

- Equal Pay Act 1970
- Sex Discrimination Act 1975
- Race Religion Act 1976

- Disability Employment Equality (Sexual Orientation) Regulations 2003
- Employment Equality (Age) Regulations 2006
- Equality Act 2006, Part 2
- Equality Act (Sexual Orientation) Regulations 2007

We are currently in the process of awaiting the outcome of the FCA D&I discussion paper issued in 2021, which will be published in Q4 2022. Once the report is published any necessary updates will be feature within this policy and be reflected within our current practice.

## 5. Equal Opportunities Statement

DLS is committed to being an equal opportunities employer and training provider, promoting and developing equality and diversity for staff, customers and suppliers across all of our services.

It will seek to do this by:

- Communicating our commitment to equality and diversity to all.
- Creating an environment where there is mutual respect and equality of opportunity providing relevant training for all staff and Subcontract Partners.
- Implementing mechanisms for implementation, monitoring, evaluation, and review.
- Treating acts of discrimination as a disciplinary offence & dealing with harassment and bullying timely and effectively.
- Engaging staff and stakeholders in the development, implementation, and execution of our policies
- Supporting and ensuring our Subcontract partners promote equality and diversity in line with legal requirements by allowing them to attend our monthly CPD sessions, requiring them to submit their CPD records annually and partake in observations in line with our internal quality assurance mechanisms. Employer and learner feedback is sought monthly to ensure standards are met not only for ED&I but for overall assurances.
- Embedding, inform and following of the five main principles of social justice - access to resources, equity, participation, diversity, and human rights.
- Ensuring apprentices feel safe and are protected from peer-on-peer abuse including when there is any kind of physical, sexual, emotional or financial abuse or coercive control exercised between people. It includes bullying, cyberbullying, sexual violence, harassment and sexting.
- Protecting apprentices from gender reassignment discrimination, there is no need to have undergone any specific treatment or surgery to change from birth sex to preferred gender as changing your physiological or other gender attributes is a personal process rather than a medical one.

All employees, suppliers and customers will receive equal treatment regardless of sex, marital or civil partnership status, race, disability, age, sexual orientation, gender realignment, pregnancy, maternity/ paternity, religion, or belief.

The Board recognise that they have responsibility for ensuring that the company operates within the legal framework for equality and for implementing the policy throughout the business. All employees and apprentices of DLS are responsible for trying to prevent discrimination that is within their control to prevent or challenge.

## 6. Types of discrimination

### 6.1 What groups can be subject to discrimination?

The Equality Act 2010 requires equal treatment for everyone, regardless of protected characteristics. There are 9 protected characteristics currently defined by the Act:



### 6.2 What forms of discrimination are there?

- **Direct discrimination;** where a person is treated less favourably on the grounds of a protected characteristic;
- **Indirect discrimination;** where an apparently neutral provision, criterion or practice would put a substantially higher proportion of those with a protected characteristic at a particular disadvantage compared with other persons, unless that provision, criterion or practice is objectively justified by a legitimate aim and the means of achieving that aim are appropriate and necessary;
- **Victimisation;** where someone is treated less favourably than others because they have taken action against the Company under the Equality Act 2010;
- **Harassment;** when unwanted conduct related to any of the grounds referred to takes place with the purpose or effect of violating the dignity of a person and of creating an intimidating, hostile, degrading, humiliating or offensive environment. This will include physical, verbal and non-verbal communications or gestures;
- **Associative discrimination;** where a person is directly discriminated against on the grounds that they are associated with another person who possesses a protected characteristic;
- **Discrimination by perception;** where a person is directly discriminated against and they do not possess a protected characteristic, but they are discriminated against on the grounds that others believe that they possess a particular protected characteristic.

**For the avoidance of doubt, we will not permit or tolerate any form of discrimination. All matters of discrimination, bullying and harassment will be dealt with effectively and efficiently, using the following processes where applicable:**

- Complaints Procedure
- Grievance Procedure
- Staff Discipline Policy
- Apprentice Learner Journey
- Safeguarding and Prevent Handbook

## 7. Implementation

This policy is one of the key documents shared with new staff during the recruitment process. Upon signing starter paperwork, staff are confirming that they have read and fully understand the content within the policy. This is then further reinforced during the month-long induction process where employees are exposed to key topics throughout.

This policy is available on the intranet, the Davies website, Thrive, and SharePoint and is prompted through new staff induction and monthly CPD staff training events to encourage engagement with the principles of equality and diversity and how these can be discussed with key stakeholders. ED&I mandatory training is carried out annually by all staff with the expectation that staff will cascade updated information to apprentices and employers. ED&I resources are available on Thrive for apprentices to develop understanding and coaches will direct learners to these as part of the wider curriculum. New clients (employers) go through extensive implementation processes before DLS will agree to work with them, this includes ensuring they are committed to ED&I. All DLS Line Managers receive external Safer Recruitment Training to ensure that selection and recruitment is fair and consistent.

All colleagues have the responsibility to uphold the policy, comply the law and support the company in fulfilling its duties and commitments. These aspects are monitored through staff observations and learner progress reviews to ensure the correct information is being addressed with learners, support plans are then put in place with staff to ensure they continually embed key information into their daily practice.

Promotional banners are created on Thrive each month, these banners promote key themes and areas of the focus to raise awareness and increase the engagement of all stakeholders. Coaches then utilise these banners to address ED&I topics directly with learners within their sessions. Senior Leaders are then able to monitor the engagement of these promotions to ensure they are being effectively distributed and having a positive impact.

The Designated Safeguarding Lead for the business distributes monthly updates and announcements to internal staff to ensure they remain abreast of key information and updates, which are used to improve their knowledge and upskill both learners and clients. These updates are transferred to Thrive to ensure key messages run throughout all our systems for improved transparency.

## 8. Related Policies and Links

Equality Act 2010: [www.legislation.gov.uk/ukpga/2010/15/contents](http://www.legislation.gov.uk/ukpga/2010/15/contents)

- Complaints Procedure
- Grievance Procedure
- Disciplinary Policy
- Apprentice Learner Journey
- Safeguarding and Prevent Handbook
- DLS 20/21 Business Plan
- 20/21 Curriculum Strategy
- Performance, Quality & Standards Handbook

## 9. Undertaking Equity Impact Assessments

We have developed a toolkit to carry out equity impact assessments. The toolkit involves a two-stage process:

1. An initial screening to assess whether the proposed policy, procedure, plan or practice has potential equality implications for different groups; if necessary.
2. A full assessment with detailed evidence analysis, stakeholder engagement and consideration of alternative approaches.

All our policies and procedures are scheduled for review; generally, on a three-year cycle. At each review or change the impact assessment process is repeated. Any underlining issues that are identified are addressed in a timely manner.

The Equity and Diversity Steering Group is a subsection of the Safeguarding Team which monitors the use of impact assessments in terms of accurate completion. All Equity Impact Assessments outcomes are available on request.