

Equality & Diversity and British Values Policy

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Single Equality Scheme

The Equality Act passed into law on 6 April 2010 and many of its provisions came into effect in October 2010. The intention of the Act is to harmonise the fragmented discrimination legislation, but it also introduces some new restrictions which affect employment.

Equality Scheme

The TTE Technical Training Group (TTE) aims to be a truly inclusive company, which is open to all sections of local, national and International communities.

Equality & Diversity

We aim to encourage, value and manage diversity and are committed to providing equality for all in order to secure the widest pool of talent possible by selecting a workforce, Learners and Apprentices that is representative of the communities from which we obtain them. We have an E&D Group which encourages representative selection from this pool. The group meets regularly to implement equality and diversity, set objectives then monitor success and compliance.

TTE believes both work and learning require effective co-operation and teamwork, and that teams are strongest where their members have a range of skills, aptitudes, interests and backgrounds. Teams which are diverse are able to cope with the wide variety of challenges and opportunities in modern life and work. Training, development and progression opportunities are available to all staff. We will protect our employees from discrimination because of race (including ethnic origin, colour, nationality and national origin), age, disability, religion or belief (including philosophical belief), sex and sexual orientation, gender and gender reassignment, marriage and civil partnership, pregnancy and maternity, social background or appearance. Breaches of our equality policy will be regarded as misconduct and could lead to disciplinary proceedings.

All employees, whether part-time, full-time or temporary, will be treated fairly and with respect. Selection for employment, promotion, training or any other benefit will be on the basis of aptitude and ability. All employees will be helped and encouraged to develop their full potential and the talents and resources of the workforce will be fully utilised to maximise the efficiency of the organisation. All people will be treated with equal value with decision making being based on merit. We are committed to the principle of equality in our paid reward system for our employees and will eliminate any bias in our pay system. Pay and benefits will be in line with current legal requirements in force, will be detailed on a written pay statement and will be paid in line with role, responsibility and skills of the position held. The written statement will identify fixed pay deductions (amounts and reasons) and will be made available before the pay date.

We recognise that all people are equally deserving of respect and we will ensure that they have the opportunity to develop to their full potential and give of their best. Equality of opportunity does not mean that everybody is the same or should be treated in exactly the same way. It means that everyone should be respected for their own characteristics and abilities and that they should be treated in ways which make the best of those abilities. In practice this means that TTE will work to ensure that, in its own premises and in those places where it has influence, we will promote and enforce respect, tolerance, thoughtfulness and goodwill to shape the best behaviour in everyone. Their opposites – racism, violence, rudeness, offensive names or 'jokes', harassment of individuals or small groups of people, bullying, the display of pornographic or racist material, ignoring or shunning people – are not acceptable and are likely to attract disciplinary measures.

Achieving greater diversity and equality of opportunity is a practical matter, requiring careful thought, determined action and persistence. Success is measurable in the quality of the organisation, as it affects the wellbeing of every member of staff and every learner; in the quality of learning opportunities, both at TTE and in the workplace; and in the careers which TTE learners are able to pursue over time. The laws of the United Kingdom have promoted equality of opportunity for many years. There is legislation forbidding unfair discrimination. This legal framework is being constantly refined and updated. TTE will ensure that, in the board meetings, staff, employer partner, contractor and learner briefings, a requirement to comply with the relevant laws is made clear.

Our Statutory Duties

For the first time, The Equality Act 2010 brings together all of the legal requirements for the private, public and voluntary sectors to make existing equality laws simpler, more effective and easier to understand. It was brought in to consolidate and harmonise all previous acts relating to protected characteristics.

Previous Acts and regulations which the Equality Act repeals include the following:

- The Equal Pay Act 1970
- The Sex Discrimination Act 1975
- The Race Relations Act 1976
- The Disability Discrimination Act 1995
- The Employment Equality (Religion and Belief) Regulations 2003
- The Employment Equality (Sexual Orientation) Regulations 2003
- The Employment Equality (Age) Regulations 2006
- The Equality Act (Sexual Orientation) Regulations 2007

Whilst TTE does not specifically have to comply with the statutory duties that apply to Public Sector organisations (i.e. the public sector equality duties – PSED), as we receive public funds and as we believe that it improves our business, we take active steps to identify and address issues of discrimination where there is evidence of prejudice, harassment or victimisation, lack of understanding, disadvantage, or lack of participation for individuals with protected characteristics. We are committed to applying the duties not to just the three legislated areas but to extend the requirement to all seven protected groups.

To do this we will:

- Assess the impact of its policies on learners and staff from different racial groups;
- Monitor the admission and progress of learners and the recruitment and career progress of staff by racial groups;
- Set out TTE's arrangements for publishing the results of assessments and monitoring;
- Report annually the results of assessments and monitoring to the Board of Directors.

Meeting our Duties

We will seek to ensure that:

- Directors, staff, learners, apprentices and customers are aware of our equality and diversity policy, its' directives and the action needed for its implementation;
- Staff, learners, apprentices and customers are aware of the value placed upon equal opportunity and that action will be taken in the event of any breach of the policy;
- Directors and staff have access to comprehensive information, which assists them to plan, implement and monitor actions to carry out their responsibilities under the policy;
- We will ensure TTE's publicity materials present appropriate and positive messages about minority racial groups.
- We set pay, benefits and any subsequent pay review in line with all current legislation and based on role, responsibility and skills of the position and no other discriminatory factor.

- We respond to problems raised, informally or through the formal grievance procedure, effectively and efficiently.
- We deliver a qualification, as required by the awarding organisation, in accordance with the Equality Act.

Definitions

- Direct discrimination – treating one person less favourably than others because of a personal characteristic;
- Indirect discrimination – applying a general policy or practice, which has the effect of disadvantaging a particular group of people;
- Harassment – uninvited behaviour which undermines people’s dignity and wellbeing;
- Bullying – a form of physical or verbal harassment, which involves an abuse of power or strength or position;
- Victimisation – unfair discrimination directed against someone who has tried to assert or protect their rights, for example by making or supporting a complaint.
- Diversity is about recognising, valuing and taking account of people’s different backgrounds, knowledge, skills, and experiences, and encouraging and using those differences to create a productive and effective workforce.
- Gender is the word often used in place of the word ‘sex’ in equality issues. ‘Gender’ does not appear in legislation (except for ‘gender re-assignment’ – see below) but ‘sex discrimination’ and ‘gender discrimination’ are generally interchangeable.
- **Gender Reassignment:** Gender reassignment is a personal, social, and sometimes medical, process by which a person’s gender presentation (the way they appear to others) is changed.
- **Ethnicity:** A strict definition of an ethnic group is a group regarded as a distinct community by virtue of certain essential characteristics – a shared history which distinguishes it from other groups and a cultural tradition of its own. Sikhs and Gypsies are examples. However, it has come to have a broader meaning and the expression ‘ethnic monitoring’ is used in reference to groups defined by colour, race or national origin as well.
- **Disability:** A disabled person is described in the Equality Act 2010 as one who has a physical or mental impairment which has a substantial and long-term adverse effect on his or her ability to carry out normal day-to-day activities.
- **Sexual orientation:** Whether a person is attracted to people of their own sex, the opposite sex or both sexes. Assumptions and perceptions of a person’s sexual orientation are also covered by law.
- **Transsexual:** Transsexual is an adjective used to describe people who have such a powerful sense of discomfort with the gender of their body and subsequent social role – a condition called gender dysphoria – that they undertake a personal, social, and sometimes medical, transition to live in the gender identity of their personal conviction.

Discrimination

Harassment and Bullying

This is unwanted conduct which violates a person’s dignity or which creates a hostile, intimidating, degrading, humiliating or offensive working environment. It can be physical or verbal and includes attacks on property as well as on a person, (See Appendix 2).

Anyone who feels that they are becoming a victim of harassment or bullying can be assured of a sympathetic hearing from the staff of TTE. The simplest and sometimes the best response is to ask the person who has given offence to stop and for a simple apology to end the matter. That can be inappropriate where the offence is serious or repeated, despite clear indications that it is hurtful or offensive. It can also be impossible; where

information technology has been used to harass or bully, for example. However the problem is to be tackled, act promptly, without waiting for it to become intolerable or to threaten wellbeing or health.

In the first instance:

Ask the person involved to stop being offensive and for a simple apology to close the matter

Or

Approach a member of staff and ask that they approach the offender on the victim's behalf

Or

Use the formal Complaints procedure, which can be found in the Learner and Staff Handbooks respectively.

Gender and Sexuality

Unacceptable behaviour may be directed towards men and women. It may consist of unwelcome name-calling; 'jokes'; hostile attitudes towards particular groups of people that override consideration for the individual; suggestive, vulgar or sexually explicit language and pictures; or unwanted physical contact. Where someone makes it clear that they find language or behaviour objectionable, it should stop. Continuation may well be harassment or bullying.

Some examples of behaviour to avoid:

- Sexually suggestive comments and gestures;
- Unnecessary physical contact;
- Derogatory remarks about people of a particular gender or sexual orientation;
- Unwelcome requests for social and sexual relationships;
- Display or sharing of pornographic or sexually-revealing pictures;
- Indecent exposure or sexual assault; these are likely to be criminal acts.

Race (ethnic origin, colour, nationality and national origin)

Racial abuse may be directed at men or women and includes name-calling; 'jokes'; hostile attitudes towards groups of people that override consideration for the individual; language or behaviour, which is known to be unacceptable to the culture of a person from a different ethnic background; and criticism of dress or appearance. In the United Kingdom, where British people come from a wide range of different ethnic groups, it is possible for a person from any background to give offence accidentally or through ignorance. When it is made clear that offence has been given the proper response is to stop and apologise.

Some examples of behaviour to avoid:

- Ridicule for physical or cultural difference;
- Exclusion from the activities of the rest of the group, in learning or socially;
- Unfair allocation of work or responsibility;
- Racist comments, graffiti or wearing of insignia;
- Unreasonable rejection of traditional dress;
- Abuse, threats or attacks; these are likely to be criminal acts.

Religion or Belief

Religion is becoming a more prominent feature of life than it has been previously, due to media. This applies to all religions even though it is most often remarked on in relation to Islam. It is not illegal to challenge religious beliefs but it may cause greater offence than was intended.

Some examples of behaviour to avoid:

- Teasing or criticising unreasonably dress codes, which may be important to believers in a particular religion;
- Mocking other people's beliefs, particularly in front of a group or in public;
- Acting on an assumption that people of a particular religion all have the same qualities or characteristics.

Disability and Access Arrangements

People with a wide range of disabilities are increasingly able to live a full life and work alongside able colleagues. The ability to learn and to enjoy appropriate learning support at TTE is an essential foundation for that widening of opportunities. The help and encouragement of every member of the company is an important part of that support.

Some examples of behaviour to avoid:

- Name-calling referring to a disability;
- Exclusion from the activities of the rest of the group;
- Unthinking assumption about what a person with disabilities can achieve or do;
- Giving unwanted and uninvited help.

Learners and Access Arrangements

As a Centre we will comply with the Equality Act and fully support disabled candidates, particularly in respect of examinations and assessments. We work in accordance with JCQ General Regulations for Approved Centres to fully support disabled candidates.

Information and advice relating to qualifications will be in an accessible format and that the qualification(s) will meet their needs. The recruitment process will ensure that we assess each potential learner and make justifiable and professional judgements to ensure that each learner can reach their potential inclusive of successfully completing any examinations, assessments and achieving the qualification(s).

In the absence of a current assessment of his or her needs, learners with a learning difficulty are assessed by an appropriately qualified specialist assessor (previously vetted to prove competence and qualification), to determine their specific needs. This may be in conjunction with one of our Partner Colleges. Once identified, support will be made available to the learner to facilitate access to examinations and assessments.

We have a written process that ensures that we check the qualification(s) of any specialist assessor we use and also to check that the assessment process is administered correctly. This will ensure that we:

- Recognise our duties towards disabled candidates as defined under the terms of the Equality Act including the duty to explore and provide access to suitable courses, submit applications for reasonable adjustments and make reasonable adjustments to the service we provide to disabled candidates.
- Work with the awarding organisations, requesting access arrangements, where required, from them in order that together we:
- Can discharge the duty to make reasonable adjustments.
- Implement the arrangements effectively
- Submit any applications for access arrangements or reasonable adjustments by the published deadline.
- Retain relevant records applicable to each learner for assessment, access arrangement and implementation in accordance with the Data Protection Act, at the centre where the course is being taken
- Submit requests for modified papers by the published deadline;

Learners who require access arrangements such as an oral language modifier, a reader or a scribe will be introduced to those acting as this prior to the examination taking place. Persons appointed to act as a prompter for a learner requiring such, especially those who have difficulty with time, will be aware of the techniques and etiquette associated with the role such as touching the desk, tapping the learners arm or shoulder. Learners granted supervised rest breaks due to suffering from fatigue, hyperactivity, obsessive compulsive disorder or

long-term health condition are escorted to a suitable and comfortable rest area, maintaining security of the examination whilst doing so.

Invigilators are made aware of the Equality Act 2010 and trained in disability issues including policies and procedures relating to emergency evacuation and the assistance the disabled person may require leaving the building, medication and alternative means of communication in the exam room when conveying suitable sized and adapted information to disabled candidates.

When explaining emergency arrangements prior to the examination being taken, we will adapt communication to ensure that any disabled person will understand them.

Seating arrangements for examinations will ensure that:

- There are chairs available outside of the examination room to enable learners with a disability or who experience stress or anxiety can sit and rest before they enter for the examination.
- There is sufficient space between desks and chairs to accommodate access and egress for learners who use a wheelchair.
- Where there is a potential that a learner will become unwell during the examination due to the nature of their disability, that they are seated close to exits so that they are more comfortable and will limit disruption to others also sitting the examination.

British Values

British Values are values that prepare Learners for life and employment in modern Britain.

The British Values are:

- Democracy
- Rule of law
- Individual liberty and mutual respect
- Tolerance of those with different faiths and beliefs

These areas are covered at TTE by the following:

- Democracy
 - Student surveys
 - Learner forums
- Rule of law:
 - Policies and procedures
 - Class rules
 - Learners rights and responsibilities
- Individual Liberty:
 - Know your rights
 - Learners Centred approach
 - Awards to celebrate learner achievements
 - Facilities to support learning – VLE
- Respect and tolerance:
 - Rich and diverse learner population
 - Embedding E&D into curriculum
 - Faith room
 - Encourage working with wider community

Monitoring

We capture information relevant to equality and diversity and present this in a format that will provide relevant analysis to top management in order to monitor and evaluate the effectiveness of this policy and to allow informed judgement to be made for setting objectives in accordance with Key Performance Indicators (KPI's).

Data captured and analysed against discriminatory indicators includes:

- Profiles of employees by grade / salary scales and types of work;
- Job application rates;
- Selection success rates;
- Allocation of employment and training contracts (permanent, fixed-term part-time, fixed-term full-time);
- Training / staff development records;
- Promotion application and success rates;
- Disciplinary / capability proceedings;
- Grievances;
- Exit survey results.

- Pay statistics

Where available, we will use external information to benchmark our results against and implement equality impact assessments (where necessary) to get to the root cause of the inequality.

We capture information from application and recruitment right through to dismissal, retirement or resignation. The following are some examples of data which are monitored:

- Applications for staff and learner positions from people of different ethnicity / gender in comparison with their representation in the local community;
- Successful selection rates of different groups in comparison with applications;
- Successful achievement rates of qualifications among different groups of learners in comparison with enrolments;
- Promotion of staff according to ethnicity / gender in comparison with average rates of promotion.

Action

We will review our processes and practices where we discover inequality. This could be that our organisation is not representative or where it appears that specific sections are not progressing as others are. Action will be taken where:

- Monitoring shows that some groups do not appear to succeed as well as others.
- it is discovered from investigation or equality impact assessment that this is not solely attributed to the most suitable person during recruitment and selection.
- A grievance is deemed to be justified.

Responsibility

Everyone who is part of or associated with, the TTE community is personally responsible for actively promoting the values described in this policy.

Leadership in diversity and equal opportunity issues is carried out by the following people:

- Board: (Board member);
- Management: (Manager and representative committee including learner representation).

The Board of TTE:

- Appoints a member of staff to champion this policy and monitor its' effectiveness and a central point of contact for those who have concerns.
- Sets and monitors diversity and equality targets annually;
- Approves and monitors the annual development plan (KPIs);
- Monitors improvements in diversity and equality over time;
- Takes responsibility for safeguarding young people and vulnerable people;
- Reflects on its own performance in diversity and equality matters;
- Implements an equal pay, benefits and pay review structure in line with current legislation.

Managers:

- Explain to staff, learners and apprentices what they are monitoring and why.
- Present information in a manner which will effectively communicate the message to them.
- Monitor the implementation of TTE equality and diversity policy with key indicators of performance which are included in an Action Plan and performance reviews.
- Reassure those providing the information for analysis and monitoring that it will remain confidential.
- Ensure that every employee, learner and apprentice has the same access to training, promotion and other opportunities in order to reach their full potential.

Positive Action

Many occupations are mainly historically, associated with a particular gender or ethnic group. For example, a predominance of men in a job role may have been previously justified by a need for physical strength at one time. In the vast majority of jobs this is no longer the case but the stereotype may live on. Employers are therefore denied access to the range of talent they need for reasons which make no sense. Where TTE finds issues of this kind we will work actively to overcome them for the benefit of both employers, employees and learners.



Steve Grant
Group Managing Director

June 2018

Other References - linked policies and procedures

This policy statement is intended to help guide everyone in TTE towards behaviours and attitudes, which reflect the best aspects of our society. Nevertheless, where people transgress, sanctions are laid down in a number of associated statements:

- Disciplinary Policy;
- Safeguarding Policy;
- Learner and Staff Handbooks;
- Grievance Policy
- Information and Communication Technology Policy;
- Appeals (against learning outcomes);
- Contractor service-level agreements;
- Code of Conduct Policy;
- Customer Feedback Policy

Sources of Help

TTE

Name	Phone Number	Job Title
Sara Marshall	(01642) 462 266 ext 211	Group Operations Director
Ian Ward	(01642) 462 266 ext 261	Group Health, Safety, Security, Environment and Facilities Manager
John Cooke	(01642) 462 266 ext 204	Group Operations Manager
Hazel Lince	(01642) 462 266 ext 317	Business & Product Development Manager
Gary French	(01642) 462 266 ext 236	Employer Engagement Co-ordinator
Nicola Jones	(01642) 462 266 ext 348	Welfare Officer

E&D Champions

Name	Job Title
Linda Adams	Management Accountant
Kathryn Brown	Commercial Tender Co-ordinator
Martin Brown	Workplace / Assessor Verifier
Claire Duck	Travel Co-ordinator
Keith Lodge	Vocational Instructor

Appendix 1 – Bullying and Harassment Harassment

In the Equality Act 2010, harassment is defined as 'unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual'.

Harassment includes any act, expression, statement (verbal or written) or visual display which is unsolicited, unwelcome, offensive, objectionable or intimidating – and any incitement to others to behave in such ways. Harassment is usually, implicitly or explicitly, related to or based on the personal characteristics of an individual or group – such as age, disability, religion, nationality or national origin, race or ethnic origin, sex and sexual orientation. It is the effect of the behaviour of the individual or group against whom it is directed, not the intentions behind this behaviour, which determines whether it is harassment.

Harassment can affect their dignity or self-esteem, causes them discomfort or distress, leads them to feeling excluded or isolated, results in them feeling intimidated or patronised and withdrawing from normal everyday social interaction.

For example, a person can subject a woman to harassment if:

- On the ground of her sex, he engages in unwanted conduct that is related to her sex or that of another person, which has unwanted effects such as violating her dignity;
- Of creating an intimidating, hostile, degrading, humiliating or offensive environment for her, or
- He engages in any form of unwanted verbal, non-verbal or physical conduct of a sexual nature that has the purpose or effect of violating her dignity; or
- On the grounds of her rejection of or submission to unwanted conduct (of this kind), he treats her less favourably than he would treat her had she not rejected or submitted to the conduct.

Bullying

Bullying is not specifically defined in law, but is not tolerated in any form by our organisation. ACAS guidance definition states 'Bullying may be characterised as offensive, intimidating, malicious or insulting behavior, an abuse or misuse of power through means intended to undermine, humiliate, denigrate or injure the recipient'.

Bullying includes the abuse of power or authority in such a way that an individual is treated with contempt and indifference, undermined, and unreasonably criticised in public or private.

Examples include (the following list is not exhaustive):

- Unwanted physical contact;
- Making life deliberately difficult for an individual who has the potential to do the bully's job better than the bully. It is the effect of the behaviour on the individual towards whom it is directed, not the intentions behind this behaviour, which determines whether it is bullying.
- Unwelcome remarks about a person's age, dress, appearance, race or marital status, jokes at personal expense, offensive language, gossip, slander, sectarian songs and letters.
- Isolation or non-cooperation and exclusion from social activities
- Posters, graffiti, obscene gestures, flags, bunting and emblems
- Personal insults
- Persistent unwarranted criticism

- Setting impossible deadlines
- Shouting and bawling
- Failure to safeguard confidential information
- Personal intrusion from pestering, spying and stalking
- Pressure to participate in political/religious groups
- Coercion for sexual favours

