

## Equality and Diversity Policy

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<b>Responsibility:</b>	Dan Gagg – Apprentice Experience Manager and Deputy Safeguarding Lead dgagg@pareto.co.uk 07951111778
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<b>Authority:</b>	Benjamin Drain – Apprenticeship Quality & Operations Director (Including Designated Safeguarding Lead)

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Pareto will promote this policy and ensure commitment towards the policy is secured through the staff induction programme and through continuous training of our employees in implementing the policy so that we can protect our apprentices, staff and partners from all forms of discrimination.

This policy will be reviewed at least annually.

More guidance is available via the Equality Act 2010

<http://www.legislation.gov.uk/ukpga/2010/15/contents>

## **Scope/Equality and Diversity Policy Statement**

This Policy covers all Apprentices, through our delivery of the Apprenticeship Levy and funding stream. As an employer and training provider, Pareto values and recognises the social and cultural diversity in our communities and aims to provide conditions that encourage everyone to participate in learning, to actively combat harassment and ensure people are treated with dignity.

Our Equality and Diversity Policy commits us to ensuring that there is no unjustified discrimination in the recruitment, retention, training and development of staff on the basis of age, disability, gender including transgender, HIV/AIDS status, marital status including civil partnerships, pregnancy and maternity, political opinion, race/ethnicity, religion and belief, sexual orientation, socioeconomic background, spent convictions, trade union activity or membership, work pattern, on the basis of having or not having dependants, or on any other grounds which are irrelevant to decision-making. Our Equality Policy takes account of relevant legal standards. We aim to abide by and promote equality legislation by following both the letter and the spirit of it in this area. We try to avoid unjustified discrimination which we recognise is a barrier to equality, diversity, inclusion and human rights.

### **Pareto is committed to:**

- Understanding, valuing and working constructively with diversity to enable fair and full participation in our work and activities;
- Ensuring that there is no unjustified discrimination in our recruitment, selection, performance management and other processes;
- Ensuring action that promotes equality; this includes conducting equality screening and impact assessments of policies and functions and progressing diversity action plans;
- Treating individuals with whom we work with fairness, dignity and respect;
- Playing our part in removing barriers and redressing imbalances caused by inequality and unjustified discrimination.

All staff are required to ensure their behaviour is consistent with this policy.

We also require that employers and stakeholders be made aware of this policy and operate within it.

We are committed to creating opportunities for all and allowing all apprentices to reach their full potential in an environment characterised by dignity and mutual respect.

This policy will help embed into our company a culture that values openness, fairness and transparency.

## Key Values

- We value diversity and equal opportunities in society and in our workforce
- We understand and promote the benefits of diversity as a means of broadening talent base, achieving high performance, and enabling all apprentices to feel included and reach their full potential
- We protect our staff and apprentices from discriminatory practices and maintain our reputation as a fair and responsible employer and training provider
- We monitor the application of the Equality and Diversity Policy and collate any statistics
- We train and educate staff and apprentices on diversity, equal opportunities and legislation
- We take a best practice approach to diversity

## Responsibilities

We are fair, open and honest and we promote this policy and equal opportunities. We are committed to raising awareness of equality and diversity amongst our apprentices, staff and clients, ensuring that all apprentices and staff are treated with dignity and respect, within a safe and secure environment, free from discrimination, harassment and bullying.

We promote this by:

- Encouraging the full participation of apprentices in all aspects of their learning
- Working towards inclusive learning by ensuring a degree of flexibility to match the needs of individual apprentices with the delivery
- Identifying and removing any discriminatory practices, procedures and customs with systems that are fair and equal to all
- Actively promoting equality and diversity among staff, apprentices and employers
- Making sure that all apprentices and staff are protected from harassment, bullying and discrimination, including those based with employers and other sites external to the provider's
- Managing any incidents or complaints relating to equality effectively and efficiently
- Having strategies in place to safeguard apprentices, such as apprentices and vulnerable adults, who are based with employers from harassment, bullying and discrimination
- We embed Safeguarding, Prevent and British Values within all Apprenticeship delivery
- We consider the policy when recruiting, delivering apprenticeship training and are working with employers and apprentices

## Recruitment and Selection Safer Recruitment

We make every effort to recruit staff and apprentices from all sections of society and ensure fair treatment throughout the recruitment and selection process.

- We make the wording and images we use reflect and appeal to all sections of society.
- We make all job specifications relevant and non-discriminatory and to ensure that short-listed candidates have skills and qualifications, which most closely match the job requirements.
- We ensure the fair, consistent and non-discriminatory questions at interview.

## **Adjustments for staff and apprentices with disabilities**

We actively seek to eliminate discrimination on the grounds of disability.

- We make every effort to identify and provide any 'reasonable adjustments' required to learning arrangements or environment.
- We provide support to apprentices with a disability to make every effort to ensure they can meet their full potential
- We make reasonable adjustments to our assessment processes for training courses where required to ensure no one is disadvantaged.

## **Learning and Development**

We deliver training and on-going CPD, advice and instruction through induction programmes and on-going professional development. At induction, we deliver training to staff on the content of the Equality and Diversity policy and the importance of raising apprentice, employer and staff awareness of equality and diversity. We make sure that the context of any in-house course adheres to the principles of the policy and that Equality and Diversity CPD content includes how to implement the policy. This learning and development is delivered through online, live zoom sessions that are tailored to the job role of the audience and include interactive content where experienced and new members of staff work together to share ideas and experiences whilst being supported and guided by at least one session host/co-host.

Monitoring of the impact of this learning and development is included within our quality assurance and quality improvement processes that include (but are not limited to) observations of teaching and learning, internal quality assurance (IQA) support and apprentice & employer voice feedback.

Pareto staff also take part in equality, diversity and inclusion learning and development, through e-learning courses, webinars and face-to-face sessions. This helps raise awareness, deepen understanding and develop new skills among our teams.

When delivering learning and development content, we endeavour to accommodate specific needs of disabled staff and apprentices.

## **Engagement with policy and communication**

A copy of the Equality & Diversity Policy is made accessible to all employees via the intranet sites. All staff, including newly appointed ones must be made aware of it and engage with their individual and wider organisational responsibilities for achieving equality objectives. In addition, the policy and supporting Equality, Diversity and Inclusion Strategy and/or its principles, in keeping with our mainstreaming endeavours, must be referred to as appropriate. This includes relevant training courses, guidance notes and manuals. Employee engagement is a fundamental element. During appropriate face to face meetings, we will seek employee feelings in a sensitive and collaborative way about inclusion to gauge how included employees feel or highlight any problems to gain valuable information and take appropriate actions. Employees will be listened to and provided with timely feedback that sets what has, can and can't be actioned.

The review and evaluation of organisational policies, procedures and practices including managing performance, career progression, remuneration and rewards, recruitment, complaints, disciplinary cases, benefits, employee turnover, learning and development supports and demonstrates inclusion through fair and transparent operations.

## Unlawful discrimination

We endeavour to protect our staff and apprentices from discrimination of any kind by raising awareness and conducting training. We will support any staff member or apprentice who raises concerns about discriminatory behaviour. We will deal with any complaints relating to discrimination sensitively and effectively through our grievance procedure or disciplinary procedure, as appropriate.

## Awareness of discrimination

We are aware that discrimination may not always be obvious and we seek to improve the awareness of our staff and apprentices of all types of discrimination.

### Direct Discrimination

When a person is treated less favourable because of their sex, race, disability, age, religion or belief, sexual orientation, marital or civil partnership status, pregnancy or maternity, gender reassignment, part-time or fixed-term employment status.

### Indirect Discrimination

When an apparently neutral provision, criterion or practice puts a group of people with a protected characteristic at a particular disadvantage when compared to other groups.

### Victimisation

When a person is treated less favourable because they have raised a complaint of discrimination (including bringing legal proceedings), or given evidence in relation to someone else's complaint.

### Harassment

When a person is subjected to unwanted conduct relating to a protected characteristic, which affects the recipient's dignity or creates an offensive, intimidating or hostile environment. This can include an isolated incident or a series of incidents.

## Protected Characteristics

We recognise that these areas intersect and form our identity, together with other characteristics, such as socio-economic status and geographical location. We help colleagues understand the business case, the moral/ethical case and the legal case for our commitment to equality.

What are protected characteristics?

It is against the law to discriminate against someone because of:

- age
- disability
- gender reassignment (including non-binary and gender fluid)
- marriage and civil partnership
- pregnancy and maternity
- race
- religion or belief
- sex
- sexual orientation

These are called 'protected characteristics'.

#### Age

A person belonging to a particular age (for example 32 year olds) or range of ages (for example 18 to 30 year olds).

#### Disability

A person has a disability if she or he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.

#### Gender reassignment

The process of transitioning from one gender to another.

#### Marriage and civil partnership

Marriage is a union between a man and a woman or between a same-sex couples.

Same-sex couples can also have their relationships legally recognised as 'civil partnerships'. Civil partners must not be treated less favourably than married couples (except where permitted by the Equality Act).

#### Pregnancy and maternity

Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

#### Race

Refers to the protected characteristic of race. It refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.

#### Religion and belief

Religion refers to any religion, including a lack of religion. Belief refers to any religious or philosophical belief and includes a lack of belief. Generally, a belief should affect your life choices or the way you live for it to be included in the definition.

#### Sex

A man or a woman.

#### Sexual orientation

Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.

## **We Promote Diversity**

We take a proactive approach to promoting diversity in all areas of the business and we are continuously improving our approach to diversity.

## **We Support our Clients**

We work with our clients and will provide support and advice on diversity issues where required. We can also assist our clients in monitoring the equality information of our apprentices. We want to demonstrate best practice at all times so that clients actively seek to work with us.

## **We Support our Apprentices**

Every Apprentice receives equality and diversity, Safeguarding, Prevent and British Values training as part of their induction and each review session will review these topics.

We are aware that diversity promotes a better blend of skills and experience and we endeavour to ensure that we are actively promoting equality and diversity throughout all of training programmes and delivery.

## **Monitoring and Evaluation**

The Apprenticeship Leadership Team will monitor and evaluate success in respect of equality by taking the following actions:

- Ensure that all employees who deliver training services receive training to ensure that they do not discriminate unlawfully
- Review and monitor our services to ensure that they do not discriminate against anyone, identify barriers to access and assess where improvements can be made
- Ensure that organisations or individuals providing services on behalf of Pareto comply with equal opportunities legislation and promote equality of opportunity

More guidance is available via the Equality Act 2010  
<http://www.legislation.gov.uk/ukpga/2010/15/contents>

<b>Responsibility Signature</b>			
<b>Name:</b>	Dan Gagg	<b>Position</b>	Apprentice Experience Manager and Deputy Designated Safeguarding Lead
<b>Signature:</b>		<b>Date:</b>	14 Oct 2022

Dan Gagg (Oct 14, 2022, 9:15am)

<b>Authority Signature</b>			
<b>Name:</b>	Benjamin Drain	<b>Position</b>	Apprenticeship Operations and Quality Director (Including Designated Safeguarding Lead)
<b>Signature:</b>		<b>Date:</b>	14 Oct 2022

Ben Drain (Oct 14, 2022, 9:45am)

**This policy will be reviewed annually (or when relevant changes to the provision require an immediate update).**