



# Equality, Diversity and Inclusion Policy

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## **Public**

This document can be disclosed outside of the QA group of companies without Director, InfoSec or Legal Team member approval.

# Version control

This policy applies to all Apprenticeships

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# 1. Statement

QA Apprenticeships (QAA) is committed to providing equal opportunities for all staff and Apprentices and eliminating discrimination.

In addition, we are committed to taking positive action to identify and eliminate inequality and promote inclusiveness.

All staff, apprentices, subcontractors and employers are expected to work together to create an environment where everyone feels safe, respected and listened to, regardless of their backgrounds.

We recognise that some groups in our society experience discrimination. We are, therefore, committed to challenging all forms of discrimination and ensuring that the promotion of equality and diversity underpins everything we do.

We will seek to redress all forms of disadvantage.

We will safeguard the interests of all the protected equality characteristics as outlined in the Equality Act 2010: disability, sex; gender reassignment, age, race, religion or belief, pregnancy and maternity, marriage and civil partnership and sexual orientation.

We will eliminate unlawful discrimination, harassment or victimisation on the grounds of the protected characteristics, as well as unfair discrimination by perception or association.

We recognise that discrimination may occur for other characteristics, such as socioeconomic status, which are not explicitly protected by the Equality Act 2010.

We will promote good practice in equality and diversity, and will ensure that all staff, apprentices' subcontractors and employers we work with operate within the context of this policy.

QA Directors and staff have a duty to implement procedures for furthering equality of opportunity and to ensure that it is carried out all times. This is laid out in both staff and learner recruitment documents.

QA will uphold the SEND Code of Practice 0-25 years 2015 to use "Best Endeavors" to meet the needs of learners who have 139a (transition plans) and Education, Health and Care Plans (EHCP).

## 2. Purpose of the Policy

The purpose of this policy is to establish clear guidance regarding equality and diversity and to establish key principles, structures and monitoring arrangements for Apprenticeships.

QA recognises its legal obligations under the following legislation:

- The Equality Act 2010
- Human Rights Act 1998
- Apprenticeships, Skills, Children and Learning Act 2009
- Special Educational Needs and Disability Act 2001

### 3. Policy Objectives

- To eliminate unfair discrimination
- To advance equality of opportunity
- To foster good relations for all including those with protected equality characteristics
- To promote and facilitate Apprentice success and narrow any gaps in Apprentice achievement
- To encourage the development and sharing of good practice in the promotion of equality and diversity

### 4. Governance

The QAA Leadership team will meet Quarterly to review equality and Diversity for apprentices and applicants.

QA will report annually on apprentice achievement by protected characteristic and set stretching targets for inclusion.

### 5. British Values

Within the UK we have a set of British Values that define who we are as a nation, these include the rights and freedoms that we openly accept. These are often misunderstood as behaviours that all must conform to. When in fact, these are just the way you would expect to be treated in your daily lives. We are happy to promote and share these values in our teaching and conduct at all times. There are four specific values, these are:

- **Democracy** – You have the right to live in a society where you can vote and have a say on how things are done
- **Rule of Law** – You have the right to live in a law-abiding society, where the law protects its citizens. You are innocent until proven guilty.
- **Mutual respect for and tolerance of those with different faiths and beliefs and for those without faith** – you have the right to be respected and tolerated regardless of your background, culture, gender, age, sexuality religion or belief
- **Individual liberty** – You have the right to live and speak freely

### 6. Equality and Diversity Principles

We will:

- Create a positive, inclusive environment with a shared commitment to respecting diversity and difference.
- Value the achievements of all Apprentices and support them to realise their full potential.
- Ensure that equality and diversity issues are considered within Business planning processes.

- Encourage all Apprentices to have high expectations and high aspirations for their future progression.
- Promote positive images of Apprentice and staff to celebrate success from all backgrounds.
- Develop a curriculum offer that meets the needs of the whole community and supports under-represented groups.
- Collect, analyse and report on a range of data that will identify areas of inequality, and develop appropriate strategies and actions that will address those inequalities.
- Make reasonable adjustments to ensure that Apprentices and staff are supported to fully participate and achieve their potential.
- Encourage applications from potential Apprentices and potential employees into non-traditional areas of work or study to address areas of under-representation.

## 7. Promoting Equality, Diversity and Inclusion

QA will promote the disability confident ethos and inclusivity values with apprentices and employers, through effective and engaging inclusive marketing campaigns, relevant topical weeks, advice and guidance in QA guides and through staff engagement.

QA will promote equality of opportunity, positive attitudes and good relations between all members of the Business community.

All staff and Apprentices are responsible for the promotion of equality.

QA takes positive action to narrow gaps in achievement and address under-representation of groups in the provision of employment, education and training. It monitors data on race, gender, age, and disability among the apprentices.

There is an action plan to re-address any gaps revealed in its monitoring which is reviewed regularly by the Senior Leadership team.

In training, QA staff will promote British values, including equality and inclusion related values. Any views expressed contrary to these values will be address in the classroom and any extreme views will be shared with the safeguarding team.

QA Skills coaches and Digital Learning Consultants will discuss and promote British values, including equality and inclusion related values at every meeting.

Assessments and Examinations: The business will comply with the SEND code of practice: 0 – 24 years in fully supporting assessments and examinations for disabled candidates, including accessible information on their qualifications, initial assessment of support needs and correct application of awarding body standards for assessment and examinations.

QA will take all possible steps to recognise a learner by the gender they identify as. QA has a duty to declare apprentices' legal sex when registering the apprentice with the ESFA for funding. This does not mean that QA cannot recognise the apprentice as the gender they identify with. QA will gather both sex and gender details from apprentices in order to ensure that:

1. all apprentices are recognised as the gender with which they identify

2. all apprentices, regardless of sex or gender, are achieving positive outcomes at the same rate.

## 8. Staff Development

QA provides all staff with training on equality and diversity. This includes initial training at induction and further sessions at different levels to promote awareness, including new requirements such as meeting the needs of Apprentices with Special Educational Needs and Disabilities, Safeguarding and the Government's Counter Terrorism Strategy (PREVENT).

Training is identified and designed to enable all staff to carry out their role in promoting equality, whilst fostering good relations between different groups and eliminating discrimination.

## 9. Disclosures

Apprentices are invited to disclose any disabilities, learning difficulties or other needs relating to protected characteristics that they may have. The opportunity to do so is presented via application and/or at initial sign up and again on programme during 1-2-1 discussions with their usual member of staff, who they are aligned to.

If, for any reason, an apprentice fails to disclose any disabilities, learning difficulties or other needs relating to protected characteristics, at the earliest opportunity QA will update the apprentice ILR and provide relevant support and adjustments once QA has been notified of these disclosures.

QA will promote an environment in which people feel confident to disclose through inclusive marketing materials and advice and guidance available online.

## 10. Feedback

Through the promotion of British values and the enrichment of the apprenticeship journey, QA will invite feedback from apprentices on their experience and perceptions of QA.

Targeted apprentice engagement will be achieved through annual feedback sessions and focus groups will be utilised to gain perceptions of the business environment, recruitment process and the quality of their experience.

Insights gained from apprentice engagement will be fed back to the senior Leadership team and incorporated into Business planning, equality and diversity action plans and local planning. Where sessions have not been available QA will revert to NPS feedback in place of face-to-face sessions.

## 11. Equality and Diversity in Practice

All staff will conform to and promote the ethos and policies related to Equality, Diversity and Inclusion.



As key stakeholders in the Business, learners have a responsibility to comply with all relevant policies, treating fellow learners and staff with respect and dignity. Learners are made aware of the relevant policies at induction, during classroom and skills coach discussions and through various methods including topical weeks, training & guidance materials and messaging.

QA will record equality and diversity incidents and complaints, and all staff will take responsibility for challenging and recording discriminatory behaviour, harassment and victimisation relating to protected equality characteristics.

The following QA Policies will be considered in conjunction with implementation of the Equality and Diversity policy:

1. Safeguarding Policy and Procedure,
2. The complaints process should be used to record, investigate and report upon outcomes of complaints or incidents related to equality and inclusion.
3. Code of Conduct (Learner)
4. QA Equal opportunities policy
5. Disciplinary Policy

Any instance of unfair discrimination, harassment and victimisation will be dealt with under the relevant Business policies and procedures.

## **12. Equal Opportunities Definitions**

### **12.1. Direct Discrimination:**

Direct discrimination takes place when a person is treated less favorably than another (in the same circumstances) on grounds such as but not limited to race, color, national or ethnic origin, sex, marital status, sexual orientation, disability, class, age or religious belief.

### **12.2. Indirect Discrimination:**

Indirect discrimination means applying a condition, or requirement which adversely affects one particular group considerably more than another, and cannot be strictly justified in terms of the requirements for performing the job.

### **12.3. Racial Discrimination:**

Discrimination on the grounds of color, race, nationality (including citizenship), ethnic or national origins. The policy is directed towards the effects of racial discrimination in employment, as set down in the Race Relations Act 1976.

### **12.4. Sex Discrimination:**

Discrimination on the grounds of a person's sex or marital status. QA is committed to countering discrimination against women in all its forms including the recognition that employment practices should acknowledge the demands of childcare and the care of other dependents.



## **12.5. Discrimination on the Grounds of Sexual Orientation:**

Discrimination on the basis of sexual orientation which means a person's sexual orientation towards; persons of the same sex, persons of the opposite sex, or persons of either sex; or in relation to the protected characteristic of sexual orientation. We remain committed to acknowledging different sexualities and supporting job applicants and employees to be open about their sexual orientation.

## **12.6. Discrimination on the Grounds of Religion:**

Where the employees have particular cultural or religious needs which may conflict with existing work requirements. QA will consider whether it is reasonably practicable to vary or adopt these requirements to enable any such need to be met.

Although the Race Relations Act does not specifically cover religious discrimination, such requirements would generally be unlawful if they have a disproportionate adverse effect on particular racial groups and cannot be shown to be justifiable.

## **13. Application of the Policy**

Unacceptable attitudes and behaviour will be dealt with decisively and according to agreed procedures.

Harassment of a group or individuals will lead to the disciplinary code being implemented.

Harassment includes physical assault or abuse, verbal threats or abuse, unwelcome physical contact, name calling, insults, ridiculing, demeaning jokes, following, comments on personal appearance or dress, graffiti against groups or individuals, removing posters, displaying or distributing materials offensive to other groups.

## **14. Grievance and Appeals Procedures**

Staff and Learners will be advised to use QA's Apprenticeships Complaints Process where they feel they have received unfair or unequal treatment or experienced harassment. Learners can raise this via the customer service team at [customerserviceteam@qa.com](mailto:customerserviceteam@qa.com).

For employees of QA who feel that they have received unfair or unequal treatment, or have experience harassment, they should email [people.team@qa.com](mailto:people.team@qa.com).

QA Ltd will monitor, review (annually) and evaluate the implementation and effectiveness of this policy.

## **15. Policy Review**

This policy will be reviewed in June 2025.

