



# **EQUALITY, DIVERSITY & INCLUSION POLICY & ACTION PLAN**

In toto ed Ltd

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Approved by: Simon Gunton

## **Statement of Commitment**

The Policy sets out our approach to equality and diversity in all that we do based on the principles arising from our mission statements:

***To create an operating environment in which all stakeholders share common values and who are committed to our long-term success. To provide quality training and learning that is wholly inclusive and will engage and support all who wish to learn, offering enrichment and promoting opportunities for lifelong learning.***

We are committed to equality of opportunity for all who learn and work with us. We respect and value the diversity of our staff, sub-contractors, learners, and the employers we serve.

We strive to create a positive working and learning environment where everyone is encouraged to reach their full potential. We will work to remove conditions that place people at a disadvantage and will not tolerate discrimination or harassment on the grounds of ethnicity, nationality, gender, gender identity, marital status, family or caring responsibilities, disability, age, sexual orientation, religion or belief, class, or social background, political or trade union activity, unrelated criminal convictions or any other criteria that cannot be shown to be justified.

Training and education play a key role in overcoming barriers in society and as articulated in our vision and mission we are committed to increasing educational opportunities for all. We serve a diverse range of learners in disparate industry sectors and companies; we are therefore committed to inclusion and we strive to ensure all learners have access to our training regardless of circumstances.

These commitments underpin all other policies processes and procedures that we have in place to ensure it is actively and comprehensively promoted in all that we do and equally in the outlook and behaviour of our sub-contractors employers and learners.

If a complaint arises that appears to be racially motivated this is referred immediately to the senior level champion for leading the diversity strategy before liaising with the company Director.

### **Leadership**

In Toto Ed will:

- identify a senior level champion for leading the diversity strategy;
- secure top-level ownership and sponsorship for the programme; and
- develop and cascade a diversity vision statement.

### **Purpose of this Policy**

The purpose of this policy is to provide clear principles and guidelines regarding our commitment to equality and diversity.

The policy states how we will promote equality and fairness in all areas of our work. It sets out how we will work to promote equality of opportunity, value diversity, eliminate discrimination, and promote good relations between different groups of people.

It outlines the responsibilities of staff, learners and others in achieving this and contributing to this policy.

### **Scope**

- Staff employed either permanently or on a temporary basis and sub-contractors;
- Members of the Board;
- Any other partners and suppliers we work with.

### **We believe that**

- All employees of our employer customers have a right to study with us with an equal chance to succeed and realise their potential, free from fear of discrimination or harassment;
- Promoting equality, fairness, and diversity benefits everyone and is everyone's responsibility.

### **We will ourselves**

- Comply with all current equality legislation in employment and in the provision of education and training;
- Raise awareness of equality and diversity and our approach to it through our marketing and training materials and through our learning processes;
- Promote this policy in our recruitment advertising and recruitment process and where possible, establish a workforce that broadly reflects the environments in which we work;
- Train all staff regularly through staff development days on equality and diversity issues (in-house, external training/events, online learning); comprehensive induction training for all new employees; and bi annually for all others, with refresher updates as required;
- Remove barriers to access and bias in admission of learners and ensure no element of the workforce is under represented;
- Create a welcoming and inclusive environment and take positive action to enhance accessibility, variety and ease of learning for all members of our employers workforce;
- Ensure staff and learners are aware of what constitutes harassment and discrimination, and what to do if they experience this;
- Deal consistently and effectively with all forms of bullying, harassment and discrimination.
- Prepare our learners to live and work in a multi-cultural society;
- Embrace diversity and celebrate and share positive examples through all media available to us;
- Monitor delivery on these commitments and take swift action to deal with shortcomings and set action plans and targets where improvement is required.
- Take action against any individual who contravenes our policy which may include formal disciplinary proceedings against individuals or in the case of contractors and suppliers the cancellation of contracts.

### **We will in collaboration**

- Use our influence as a supplier to help promote equality and diversity and to challenge negative stereotypes of excluded and disadvantaged communities;
- Work with other stakeholders and partners to make sure that equality and diversity policies and plans are similar to our own:
- Support and learn from organisations promoting equality and diversity, locally, regionally and nationally;

- Distribute a statement of our equality and diversity policy to all staff, sub-contractors, employers and learners;
- Take steps to ensure learners are protected from harassment and discrimination at work by encouraging employers to have well-publicised policies and effective procedures in place;
- Discontinue relationships with employers where bullying, harassment and discrimination continues despite our attempts to influence change;
- Encourage employers to promote training for people from groups that are underrepresented on training programmes;

## **EQUALITY LEGISLATION**

The Equality Act 2010 broadens the protection from the discrimination afforded to employees in the workplace.

Employers should ensure that:

- Equality and Diversity policies cover all protected characteristics and does not refer to out of date law. (Age, Disability, Religion or Belief, Sexual Orientation, Transgender, Ethnicity, Gender, Pregnancy and maternity and Marriage and Civil Partnership)
- Training materials should be up-to-date and include all protected characteristics
- Recruitment and Selection policies, procedures and materials should be up-to-date and cover protected characteristics. Pre-employment health questions should be removed from application forms/packs.
- Have up-to-date Equality and Diversity, Bullying and Harassment and Complaint Policies to ensure third party harassment is something you will not tolerate

Indirect discrimination can now be claimed across all seven protected characteristics (Age, Disability, Religion or Belief, Sexual Orientation, Transgender, Ethnicity, Gender). Not included are Pregnancy and maternity and marriage and civil partnership.

Positive action is now available to be used should there be two job applicants of equal calibre the minority person may be selected for the post. Employers must show evidence of a fair and equal selection process.

## **PROTECTED CHARACTERISTICS**

### **Age**

Where this is referred to, it refers to a person belonging to a particular age (e.g. 32 year olds) or range of ages (e.g. 18 - 30 year olds).

### **Disability**

A person has a disability if s/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 defined as a 'union between a man and a woman'. Same-sex couples can have their relationships legally recognised as 'civil partnerships'. Civil partners must be treated the same as married couples on a wide range of legal matters.

### **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 has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live for it to be included in the definition.

### **Gender**

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

## **EQUALITY AND PREVENT DUTY**

### **Equality Duty**

In Toto Ed directly reports retention and success data for learners within some of these characteristics. We have a series of arrangements in place to take due regard of individuals and groups within the other categories. This document

outlines the Company's approach to ensuring that staff, learners, and visitors are treated fairly and consistently, and within the legal framework of the Duty.

The Duty requires In Toto Ed to:

- publish information annually to show its compliance with the Equality Duty; and set equality objectives and publish them at least every four years after that.

The policy is available on the Company's web site and contains information on how it complies with the Duty together with the objectives that it has set for that academic year.

The Duty states that In Toto Ed must publish information that outlines how it is complying with the Equality Duty and how it is showing due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advance equality of opportunity between people who share a protected characteristic and people who do not share it; and
- Foster good relations between people who share a protected characteristic and people who do not share it.

In Toto Ed remains committed to fulfilling these requirements and will continue to focus on its policies and procedures to ensure that this is achieved.

## **PREVENT DUTY**

In Toto Ed continually reviews its practices to ensure that it is complying with the Prevent Duty as set out in the Counterterrorism and Security Act 2015. The requirements of the Prevent Duty are covered within this document, which is reviewed on a regular basis, annually at least, to ensure that the organisation has sufficient arrangements in place to educate, and keep safe, its learners, staff, employers, contractors and visitors and to react to a situation which falls under this legislation.

In Toto Ed focuses on the development of a culture in which everyone feels safe and respected and has the confidence to inform others of any potential risk to individuals or groups. As part of this ethos, we have considered the Prevent Duty and the importance of collaborative working between Company staff, local authorities, police, other educational institutions, policy makers and health providers to identify, detect and safeguard vulnerable people throughout the organisation.

British Values are promoted and embedded these into lesson planning and the tutorial pastoral cycle. In Toto Ed Observation of Teaching and Learning Processes now take account of the Prevent Duty and British Values:

- Democracy
- The rule of law
- Individual liberty Mutual respect
- Tolerance of those with different faiths and beliefs.

**We will deliver these messages by**

- Enabling all learners to develop their self-knowledge, self-esteem and self-confidence
- Encouraging learners to accept responsibility for their behaviour, show initiative, and to understand how they can contribute positively to the lives of those living and working in the locality of the school and to society more widely
- Enabling learners to acquire a broad general knowledge of and respect for public institutions and services in England
- Ensuring learners understand different cultural traditions by enabling learners to acquire an appreciation for and respect for their own and other cultures
- Encourage respect for democracy and support for participation in the democratic processes, including respect for the basis on which the law is made and applied in England.
- Checking their understanding about the penultimate paragraph, which now includes them in requirements regarding the Equality Act's protected characteristics:
- Encourage respect for other people, paying particular regard to the protected characteristics set out in the Equality Act 2010.

The Company has a separate strategy, risk assessment and action plan in place to cover its responsibilities under the Prevent Duty which is reviewed at least annually and audited externally. The strategy is available on the Company's web site. The risk assessment and action plan can be requested and is available on the Company's intranet for staff and learners to view. These documents are monitored by the Company Leadership Team, Safeguarding Forum, and Board of Directors. Staff and learner awareness training takes place on a regular basis

#### **Other Related legislation:**

The Employment Equality (Religion or Belief) Regulations 2003

The Race Relations Act 1976 The Race Relations Amendment Act 2000

The Equality Bill 2009

The Sex Discrimination Act 1975

The Gender Equality Duty 2007 The Disability Discrimination (Amendment) Act 2005

#### **PUBLIC SECTOR EQUALITY DUTY**

In Toto Ed publishes equality information and objectives on its website and reviews progress annually. Equality objectives are refreshed at least every four years and are informed by learner outcome data, staff information, consultation activity and quality assurance processes.

#### **REPORTING DISCRIMINATION, HARASSMENT OR BULLYING**

All staff are responsible for recognising and dealing informally with any incident of bias, stereotyping or discrimination. Where a learner wishes to report an incident of bias or stereotyping or discrimination the personal coach or a member of the teaching team will be happy to discuss the matter (Company Complaints Procedure).

Should staff feel that an incident of bias or stereotyping or discrimination has occurred they should report it to their Line Manager and/or through use of the Company's Harassment or Grievance Procedure.

### **Staff**

Please report incidents to your Line Manager, a member of the Company Leadership Team, a member of HR or a Union Representative.

Formal cases will be dealt with through the Harassment Procedure, Grievance Policy and/or the Disciplinary Policy as appropriate to each individual case.

### **Learners**

Please report incidents to your Tutor, Assessor, Internal Verifier or workplace line manager.

The formal process is detailed in the bullying policy.

### **Reporting Hate Incidents**

A hate incident is any type of incident perceived to be racist, homophobic or driven by other prejudice by the victim or any other person. If you experience or witness a hate incident, please report it to the Safeguarding Team.

### **Cyber Bullying and Harassment (Social Media)**

Bullying and harassment by the Company community which takes place outside of Company that impinges on staff or learners' welfare/wellbeing will be dealt with in accordance with Company policies and procedures.

## **CONSULTATION**

Learners are provided with the opportunity to give feedback and comment on the Company's arrangements within Learner surveys, focus groups and during teaching and learning observations. Any comments made are either dealt on an individual basis or included within action plans for the following academic year.

Staff feedback is obtained through appraisals, informal feedback, team/SMT meetings, the Company's noticeboard arrangements and through the Company's website.

## **MONITORING**

The Director of HR, Compliance and Safeguarding and Company Director are accountable for our achieving the aims of this policy.

The Heads of Centre is responsible for day-to-day implementation and championing these issues. Our Grievance Procedure is detailed for staff to escalate any personal issues including those they believe to be equality or diversity related.

Potential exclusion or underperformance of particular groups is via reviewed quarterly and appropriate action taken either through employer engagement, staff training or programme development. Through our comprehensive QA and management information systems, we monitor all aspects of equality and diversity through our self-assessment and improvement processes, defined within our SAR and QIP respectively.

## **REVIEW**

This policy will be reviewed on an annual basis or following changes to Government updates and statutory guidance in relation to Covid-19 and company risk assessment policies and processes.

This policy will be reviewed annually by the Director of HR, Compliance and Safeguarding and signed off by the Company Director.

## **Statement of Commitment**

In Toto Ed Ltd is committed to equality, diversity and inclusion in all that we do. This policy is informed by our mission to create an operating environment in which all stakeholders share common values and are committed to our long-term success, and to provide quality training and learning that is wholly inclusive, accessible and supportive of lifelong learning.

We are committed to equality of opportunity for all learners, staff, subcontractors and partners. We respect and value diversity and work proactively to remove barriers that place individuals or groups at a disadvantage. Discrimination, harassment or victimisation on the basis of any protected or other unjustifiable characteristic will not be tolerated.

In line with the Equality Act 2010 and, where applicable, the Public Sector Equality Duty (PSED), In Toto Ed gives due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations when developing policy, making strategic and operational decisions, commissioning activity, and designing or reviewing services.



## Introduction:

The three year Equality and Diversity action has been developed through discussions with key staff and outcomes from the learners. Equality and Diversity, is an agenda item on all meeting agendas, however, the monitoring for compliance and implementation will be through the Equality and Diversity group. This plan will be monitored for implementation at various stages throughout the 'Learning Journey' and through In Toto Ed staff appraisals. It will be updated yearly as to progress.

OBJECTIVE	ACTIONS	RESPONSIBILITY	COMPLETION DATE	IMPACT
<p>1. All imagery should reflect and celebrate the diversity of the local communities.</p>	<p>a) Continue to ensure learner imagery in publications, display materials, the In Toto Ed website and internal wall displays reflects and celebrates the diversity of the learners.</p> <p>b) Continue to monitor learner perception of E&amp;D and incidence of discrimination and harassment through learner surveys, complaints and safeguarding reporting.</p> <p>c) Ensure full promotion of Equality</p>	<p>Marketing manager</p> <p>All Staff</p> <p>Managers and Learner Voice lead</p> <p>All staff</p>	<p>On going</p> <p>On going Monthly at Learner Voice Forums</p> <p>Monthly at Case Conferences and team meetings.</p>	<p>a. Learners and external partners will visually see that In Toto Ed is inclusive of all backgrounds. It will attract learners from all ethnicity and diversity backgrounds. Monthly celebrations of all ethnicities are celebrated and recorded.</p> <p>b. Higher learner responses through surveys. More relevant Centre specific feedback which will lead to effective change in behaviour and a better learning environment. Policies put in place protect the learner and ensure they feel safe throughout the journey.</p>

	and Diversity commitments throughout the learner journey			c. Learners will be better educated in different cultures and celebrations. Staff will be more knowledgeable when dealing with sensitive topics. Learners will have a better tolerance and understanding of E&D topics.
<b>OBJECTIVE</b>	<b>ACTIONS</b>	<b>RESPONSIBILITY</b>	<b>COMPLETION DATE</b>	<b>IMPACT</b>
2. Monitor gender profiles	Continue to monitor gender profiles at qualification level and promote provision through imagery and course literature that challenges gender stereotypes.	Managers and Marketing Manager.	Quarterly Performance Plans/Monthly Managers Reports	Higher number of females taking part and successfully completing courses that are currently male dominated and vice-versa. Vocational courses will benefit from all sexes taking part and progressing into various industries.
3. Analyse ethnic minority group learner success rate trends.	a) Continue to undertake a qualification level analysis to evaluate success rate trends for ethnic group learners to identify curriculum team plan actions required to ensure any discernible gap	Managers  Managers	Monthly Managers  Reports/Quarterly	Learners will achieve in relation to their peers regardless of background of learners and staff. Managers will, through the analysis of data be able to better target any underperforming areas and in turn they will even out as an ongoing impact.

	analysis is addressed. b) Continue to consider the ethnic minority of staff compared to learners and any impact on learner performance outcomes.		Performance Plans	
4. Ensure In Toto Ed as an employer is disabled friendly.	a) Ensure that In Toto Ed supports staff to access work related opportunities (within reasonable adjustment) b) Ensure In Toto Ed has buildings that are accessible (within reasonable adjustment).	Director of HR, Compliance and Safeguarding  Director of HR, Compliance and Safeguarding	31 December 2020	Ensure that the best candidates are employed regardless of disability. Promoting disability awareness amongst staff and learners that breaks down stereotypes. Anyone with a disability will be able to access In Toto Ed premises (within reasonable adjustment)
<b>OBJECTIVE</b>	<b>ACTIONS</b>	<b>RESPONSIBILITY</b>	<b>COMPLETION DATE</b>	<b>IMPACT</b>
5. Ensure that all learners and staff promote Prevent & British Values.	a) Embed into induction for all new learners and staff b) Staff to embed where appropriate	HR, and Senior Managers  Staff Managers Quality Team	Ongoing	All staff and learners will have an understanding of Prevent & British Values, how they relate to the programme and how they are used in the workplace. Learners will know where the relevant information is and how it impacts on them as learners.

<p>1. democracy. 2. the rule of law. 3. individual liberty. 4. mutual respect for and tolerance of those with different faiths and beliefs and for those without faith.</p>	<p>into the strands of the learner journey c) Centres/WBL to display Prevent &amp; British Values d) Observations to focus on Prevent &amp; British Values for all graded aspects of the learner journey Embedding – part of wider Prevent Agenda – will be included in SoWs &amp; Lesson Plans – monitored by both WBL &amp; programme teams – fully embedded by Delivery as part of the syllabus, monitored Operational Programme Managers.</p>			<p>Better teaching and learning OTLA grades</p>
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**Name**

**Simon Gunton**

**Director**



**Signature .....** **Date 10/03/25**