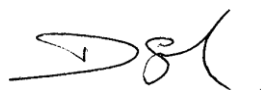


Equality, Diversity and Inclusion Policy v6

Version	Date	Policy Author(s)	Review Date
Version 1.0	March 2018	Judith Wayne	March 2019
Version 2.0	February 2019	Judith Wayne & Victor Stephenson-Henshaw	February 2020
Version 2.1	February 2020	Judith Wayne & Victor Stephenson-Henshaw	February 2021
Version 3.0	July 2021	Debbie Gardiner MBE, CCO	July 2022
Version 4.0	August 2022	Debbie Gardiner MBE, CCO	August 2023
Version 5.0	June 2023	Debbie Gardiner MBE, MD	June 2024
Version 6	June 2024	Debbie Gardiner MBE, MD	June 2025

Version	Page No.	Paragraph / Bullet	Changes
Version 5	1		Debbie Gardiner MBE change of job title.
	4		Added Advancing Equality & Diversity in FE Training.
Version 6			Re-write of policy.

Signed:



Printed Name:

Debbie Gardiner MBE

Job Title:

Managing Director

Date:

26th June 2024

1. POLICY STATEMENT

This policy demonstrates how AKG (UK) Learning Ltd t/a AKG Learning celebrates and values diversity and is committed to equality of opportunity for all. This policy intends to provide general guidance and advice to learners, apprentices and employees.

We want to ensure that people with diverse characteristics and backgrounds consider AKG Learning to be a learning provider and employer of choice. We want everyone that works or learns with us to reach their full potential in an environment which is respectful and that accepts individual difference.

At AKG Learning we celebrate and value diversity, and we are committed to advancing equality of opportunity, regardless of age, disability, gender reassignment, race, colour, nationality, religion or belief, sex, sexual orientation, marital or civil partner status, pregnancy or maternity, or social background and family responsibilities.

In particular, we strive to:

- Encourage the participation of learners and apprentices of all abilities.
- Provide a safe and welcoming physical and learning environment.
- Develop facilities and courses to improve access and widen participation.
- Offer support to meet individual learner, apprentice, and employee needs.
- Ensure recruitment processes are fair and transparent.
- Encourage and support diversity, equity and inclusion and actively promote a culture that values difference and eliminates discrimination.
- Make reasonable adjustments to enable individuals with disabilities to function effectively and to their full potential.

This policy should be viewed in the context of the Equality Act 2010 and the extent of protection it provides.

2. PRINCIPLES

AKG Learning is recognised as an organisation which provides excellent employment and educational opportunities. We are committed to complying with the relevant legislation and will endeavour to exceed this creating a culture of inclusivity where everyone is treated with respect and dignity. We resolve to eliminate discrimination and other unfair treatment to all those we deal with as an organisation. We have a zero-tolerance approach to discrimination in any form.

AKG Learning is a Disability Confident Committed Employer, an Age Friendly employer and recognised by the Living Wage Foundation as the Living Wage Employer.

Our commitments

Marketing and Access to Learning

Our publicity and recruitment procedures are designed to encourage applications from all sections of the community and from all levels of ability and will be available in a range of formats.

Applicants are not treated less favourably because of disability, age, race, colour, nationality, religion or belief, pregnancy or maternity, marriage or civil partnership, gender reassignment, sex and sexual orientation.

We will ensure that programme applications and enrolment procedures are user friendly and avoid unnecessary barriers to access.

We have adopted best practice in Safer Recruitment. We are Disability Confident Committed (level 1 employer) and working towards becoming a Disability Confident Employer (level 2).

We will continue to identify and respond to learning needs within the communities in which we work and will encourage widening participation from underrepresented, disadvantaged or excluded groups.

We make clear our expectations and commitments to equality, diversity and inclusion (EDI) in our marketing materials and events, during the enrolment process and again during induction. This is further embedded throughout our apprenticeship and other learning programme delivery.

Equal opportunities data is collected, analysed and used to inform the planning and decision-making process of our marketing.

The Learning Environment

We are committed to the development of learning environments that are welcoming and safe for all. We will continue to develop our facilities to improve access for learners with disabilities.

Through a multi-agency approach, we meet the targets surrounding the 'Every Child Matters Strategy':

- Be healthy.
- Stay safe.
- Enjoy and achieve.
- Make a positive contribution.
- Achieve economic well-being.

Teaching, Learning and Assessment

Staff ensure that teaching and learning materials and delivery methods are free from bias, avoid stereotyping and discrimination. Staff encourage learners to explore equality and diversity issues.

Awareness raising of EDI with real examples forms part of the part of the general induction and is embedded as a golden thread within our curriculum.

We ensure that learners with disabilities receive appropriate additional support to meet individual needs to function effectively and to their full potential.

We provide a range of support services and facilities which will enable all learners to participate fully in studies, including:

- tutorial support
- additional support with learning
- financial and welfare advice
- personal counselling
- social/recreational/catering facilities
- multi faith rooms

Staff will regularly review course design and delivery to meet the various learning needs to improve access to learning.

We aim to ensure that the views and perceptions of learners are included in the process of curriculum review, self-assessment and curriculum development.

Resources are available in formats appropriate to the needs of individual learners, including the use of specialist equipment where appropriate.

We use performance outcome data to analyse achievement rate and grades by a range of different characteristics to identify any groups that are falling behind their peers. This leads to the development of meaningful Equality and Diversity Impact Measures (EDIMs), where we action plan interventions to close the attainment and participation gaps. EDIMs are monitored quarterly and reports form part of our board papers.

Training and Development

AKG Learning treats everyone with respect and dignity, and aims to provide a working environment free from harassment, discrimination, and victimisation. We will not tolerate any form of discriminatory behaviour.

Individual training and development needs are identified through the appraisal process. Our Continuing Professional Development (CPD) Policy identifies EDI as a topic for annual refresh and update, this happens using a range of methods that are suitable for each role in the organisation. All employees and contractors complete Advancing Equality and Diversity in FE Training.

We ensure progression opportunities are available to all.

We ensure all policies and procedures promote equality of opportunity and are not unlawfully discriminatory in their operation.

3. SCOPE AND LIMITATIONS

This is an overarching policy on equality, diversity and inclusion that applies across all areas of business, including employment, teaching and learning, procurement and marketing and enrolment. This policy should not be read in isolation but cross referenced with all associated policies (section 8), procedures, and practices. EDI is the golden thread that runs through the business and is an integral part of our strategic intent.

AKG Learning will abide by its statutory duties and in line with its obligations under the Equality Act 2010 to:

- Eliminate discrimination, harassment, and victimisation.
- Advance equality of opportunity.
- Foster good relations between different groups.

This policy applies to all learners, apprentices, employees, team members, temporary staff from employment agencies, contractors / freelancers, visitors, employers and work placement providers. The procedures set out in this policy are intended for implementation across the entire organisation.

The following forms of discrimination are prohibited under this policy and are unlawful:

- Direct discrimination
- Indirect discrimination
- Harassment
- Victimisation
- Third party harassment

AKG Learning will not tolerate any form of discrimination and everyone will receive equal treatment regardless of age, disability, gender reassignment, maternity and pregnancy, race, colour, nationality, religion or belief, sex, sexual orientation, marital or civil partnership status or socio – economic status.

Breaches of this policy will be regarded as misconduct and will therefore be subject to the disciplinary policies.

4. RESPONSIBILITIES

Managing Director and Executive Board of Directors

It is the responsibility of the Managing Director and Executive Board of Directors to ensure that AKG Learning meets its legislative responsibilities in respect of EDI and for receiving and responding to monitoring information. The Board sets an example in the promotion and engagement with this policy and principle of EDI.

The Managing Director and Executive Board of Directors delegate day-to-day responsibility for overseeing implementation of this policy to the senior leadership team (SLT).

Senior Leadership Team

The SLT are charged with bringing this policy to life and using a range of communication and training techniques to ensure that there is full engagement across the business.

The SLT is responsible for ensuring that learners, apprentices and employees are familiar with the content of this policy and understand their legal objectives. The SLT is committed to providing support and equality and diversity training to promote a positive and inclusive culture for learning and for work.

The SLT are responsible for ensuring that the recruitment and selection policy does not discriminate in any way and that job advertisements are fully inclusive. This will include advertising to a diverse section of the labour market and, where relevant, to particular groups that have been identified as disadvantaged or underrepresented in our organisation, and reach the widest possible candidate pool.

Recruitment and promotion will be conducted on the basis of merit, against objective criteria that avoid discrimination. When recruiting or promoting, we will aim to take steps to improve the diversity of our workforce and provide equality of opportunity. We ensure that recruitment and selection procedures are open, consistently applied, and free from bias, stereotyping and discrimination.

Shortlisting and interviewing should be done by more than one person where possible. Our recruitment procedures will be reviewed regularly to ensure that individuals are objectively assessed on the basis of their relevant merits and abilities.

Additionally, we will endeavour to ensure that reasonable adjustments are made to arrangements and premises to ensure individuals with disabilities have equality of access. Additionally, if required, we will provide additional learning support, by accessing funding from the ESFA and allocating protected time with our Learning Support Specialist.

Learners, apprentices and employees

All learners, apprentices and employees are responsible for ensuring the implementation of this policy, and for their own conduct.

We are committed to the general health and wellbeing of our learners, apprentices, and employees. We encourage them to develop positive relationships, to respect others and to celebrate diversity. Bullying or discrimination or any other form of discriminatory behaviour will not be tolerated. Safeguarding procedures are in place to ensure that the organisation is safe and secure.

We seek to provide a supportive environment for those who make claims of discrimination or harassment according to the policies listed in this document.

5. IMPLEMENTATION ARRANGEMENTS

Everyone will be made aware of the policy and procedure during the formal induction process. Updated and amended procedures are disseminated and reinforced in training sessions and team meetings. This policy is accessible on our website and additionally employees can access it from our internal HR Breath system.

All employees, including Board members, will complete annual refresher training, which is recorded on CPD logs and our HR system.

6. MONITORING AND REVIEW

The Equality, Diversity and Inclusion Policy and its implementation will be formally reviewed on an annual basis. We will monitor the effectiveness of our policies and procedures in meeting our diversity, equity and inclusion objectives and to identify areas in which further resources or support are required to achieve equality of experience.

To ensure that this policy is operating effectively, and to identify groups that may be underrepresented or disadvantaged in our organisation, we monitor the profiles of our learners, apprentices and employees' ethnic group, nationality, gender, gender identity, disability, sexual orientation, religion and age.

Monitoring for apprentices and learners is undertaken by the MIS and Contracts Manager, for employees by the HR department. Data collected for monitoring purposes will be reported annually to the Board of Directors. The information is held in accordance with data protection legislation.

Enrolment, retention, and achievement, learner survey and complaints are annually monitored and the findings are used to inform the Self-Assessment Reviews. Learners' views are identified by means of satisfaction surveys, learner representatives and the equality and diversity groups.

Complaints made to AKG Learning on grounds associated with equality and diversity are considered a high priority and actioned as quickly as possible and analysed to establish any trends. Complaints will be treated in confidence and investigated as appropriate.

The following systems are in place to monitor and evaluate the equality and diversity impact AKG Learning policies:

- Annual Self-Assessment Report (SAR).
- Learner survey and focus groups.
- Equality and diversity data analysis.

7. DEFINITIONS

The nine **Protected Characteristics** are the grounds upon which discrimination is unlawful.

Direct Discrimination occurs when someone is treated less favourably than another person because of a Protected Characteristic they have. Direct discrimination can include associative discrimination, where a person is treated less favourably because of their association with an

individual with a Protected Characteristic, and perception discrimination, where a person is treated less favourably because of a mistaken belief that they possess a Protected Characteristic.

Indirect Discrimination occurs where a provision, criterion or practice that applies to everyone adversely affects people with a particular Protected Characteristic more than others, and is not justified.

Harassment includes sexual harassment and other 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.

Victimisation occurs where there is retaliation against someone who has complained or has supported someone else's complaint about discrimination or harassment. This also includes where someone mistakenly believes that the person victimised has done so.

Third Party Harassment under the Equality Act makes AKG Learning potentially liable for harassment of team members and learners by people (third parties) such as clients or customer and contractors of the employer/provider.

Disability discrimination includes direct and indirect discrimination, any unjustified less favourable treatment because of the effects of a disability, and failure to make reasonable adjustments to alleviate disadvantages caused by a disability.

Definition of the nine Protected Characteristics

- i. Age**
 - A person belonging to a particular age (for example 32-year olds).
 - A range of ages (for example 18 to 30-year olds).
- ii. 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.
- iii. Gender reassignment**
 - A person who is proposing to undergo, is undergoing or has undergone a process (or part of a process) for the purpose of reassigning the person's sex.
- iv. Marriage and civil partnership**
 - The person is married or is a civil partner.
- v. Pregnancy and maternity**
 - A person who is pregnant, breastfeeding or because you've recently given birth.
 - Maternity refers to the period after the birth and is linked to maternity leave in the employment context.
- vi. Race**
 - Race includes colour, nationality, ethnic or national origins.
- vii. Religion or 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.

viii. Sex

- A man or a woman.

ix. Sexual orientation

- Sexual orientation means a person's sexual orientation towards persons of the same sex, persons of the opposite sex, or persons of either sex.

8. SUPPORTING/RELATED INFORMATION

Please note that this policy does not form part of any contract of employment or other contract to provide services, and we may amend it at any time.

Questions about the policy or suggestions for changing should be referred to the [Senior Leadership Team].

All external complaints relating to any aspect of equality will be dealt with as a priority in line with our published **Complaints Policy**.

If you wish to make a complaint relating any aspect of EDI, please use the following email address and give an overview of the complaint so that we can allocate the most appropriate person to contact you and investigate further: complaints@learnplusus.co.uk

All employee grievances relating to any aspect of equality will be dealt with as a priority, following our **Grievance Procedure**. Employees are encouraged to address any concerns with their manager or another manager prior to raising a grievance, as this is often the most effective way to resolve a problem.

We will use of **Disciplinary Policy** with any employee that has conducted themselves in a manner that is contrary to this policy. All such occurrence may lead to a disciplinary sanction and could result in termination of contract.

Further useful sources of information are listed below:

www.ucu.org.uk

www.equalityhumanrights.com

www.acas.org.uk

[Equality Act 2010 \(legislation.gov.uk\)](http://Equality Act 2010 (legislation.gov.uk))

Please contact info@learnplusus.co.uk if you would like this policy to be made available in an alternative format.

Linked policies:

CPD Policy

Disciplinary Policy

Grievance Procedure
Safeguarding & Prevent Policy
Whistle Blowing Policy
Complaints Policy