



Equality and Diversity Policy

REVIEW: 7th January 2020

Policy Statement

The Elmhouse Training is committed to achieving a working environment which provides equality of opportunity and freedom from unlawful discrimination on the grounds of race, colour, nationality, ethnic origin, sex, pregnancy and maternity status, marital or civil partnership status, gender, disability, religion or beliefs, age, sexual orientation or offending background. We are also committed to valuing the diversity of our employees, customers, suppliers, partner organisations and local communities.

We are determined to actively oppose all forms of discrimination and to remove any unfair and discriminatory practices from the company. This includes ensuring our services do not discriminate against our customers, suppliers, partner organisations and local communities.

We are committed to creating a working environment which embraces equality and diversity and is free from any form of discrimination including harassment, bullying or victimisation, and within which all individuals are treated with fairness, respect and courtesy.

Aim of Policy

The aim of this policy is to:

1. Prevent all forms of unlawful discrimination;
2. Ensure that recruitment, promotion, training and development, assessment, terms and conditions of employment (including pay and benefits), redundancy, dismissal and service provision are determined on the basis of capability, qualifications, experience and skills.

We fully accept our responsibilities and adhere to all UK anti-discrimination and equality legislation including but not limited to:

- ◆ Equality Act 2010
- ◆ the Rehabilitation of Offenders Act 1974
- ◆ the Protection from Harassment Act 1997
- ◆ the Human Rights Act 1998
- ◆ the Sex Discrimination (Gender Reassignment) Regulations 1999
- ◆ the Racial and Religious Hatred Act 2006
- ◆ any Codes of Practice issued by the Equality and Human Rights Commission plus any amendments to the above legislation

We also have separate policies for Recruitment, Harassment & Bullying, Whistleblowing, Complaints & Appeals, Disciplinary, Grievance, Employee Code of Conduct, Safeguarding Children and Vulnerable Adults and Data Protection, which demonstrate our commitment to equality and diversity throughout our systems and processes.

Definition of Discrimination

Discrimination takes place when one person is treated more favourably than others on the grounds of race, colour, nationality, ethnic origin, sex, pregnancy and maternity status, marital or civil partnership status, gender, disability, religion or beliefs, age, sexual orientation or offending background. Discrimination includes harassment (including sexual harassment), bullying and victimisation. There are two types of discrimination as follows:

Direct Discrimination

This occurs when a person or a policy intentionally treats a person less favourably than another on the grounds of race, colour, nationality, ethnic origin, sex, pregnancy and maternity status, marital or civil partnerships, gender, disability, religion or beliefs, age, sexual orientation or offending background.

Indirect Discrimination

This is the application of a policy, criterion or practice to all individuals, but which:

- ◆ Has an adverse disproportionate impact on a group of people because of their race, colour, nationality, ethnic origin, sex, pregnancy and maternity status, marital or civil partnership status, gender, disability, religion or beliefs, age, sexual orientation or offending background;
- ◆ The employer cannot show it to be justified; and
- ◆ It causes a detriment to the individual.

Reasonable Adjustments

The company acknowledges that it has a duty to make reasonable adjustments to facilitate the employment of a disabled person. These may include:

- ◆ Making adjustments to premises;
- ◆ Supplying or modifying equipment, instruction and training manuals for disabled employees; or
- ◆ Any other adjustments that the company considers reasonable and necessary provided such adjustments are within the financial means of the company.

If an employee has a disability and feels that any such adjustments could be made by the company, they should contact the HR Manager or the Corporate Services and Director.

Implementation of the Policy:

We will:

- ◆ communicate our commitment to valuing diversity and promoting equality, in conjunction with related policy documents, in employee and customer recruitment literature, handbooks, and in other corporate communications as appropriate;
- ◆ incorporate the promotion of equality into corporate planning;
- ◆ ensure that decisions concerning recruitment, selection, training and development, and the career progress of our employees, and the admission, progress and support of customers, are fair and unbiased, and made solely on the basis of objective criteria, individual merit and ability;
- ◆ ensure that terms and conditions of employment, procedures for redundancy and dismissal are free from all forms of direct or indirect discrimination;
- ◆ ensure that the way we purchase goods, services and facilities reflects our commitment to equality and diversity;
- ◆ Systematically and progressively assess the impact of our policies, practices and procedures on as diverse a range of people as possible. We will take whatever steps necessary to identify and eliminate unjustified adverse impact;
- ◆ promote and support the development of good practice at all levels and in all areas, and to all our stakeholders;
- ◆ provide training and development on a range of diversity and equal opportunities issues. Training is mandatory on an annual basis for all staff within the Company.
- ◆ take positive action, informed by equal opportunities monitoring of customers and staff (to include training and development opportunities of staff), to develop and maintain a diverse staff and customer body at all levels and in all areas;
- ◆ ensure all customers that the Company is responsible for have access to fair assessment which may include those with learning difficulties, customers who undertake shift work or are single parents;
- ◆ ensure that the customer complaints policy is adhered to and investigations are carried out by the Company Quality Manager in an independent, fair manner. All allegations of unacceptable behaviour will be investigated thoroughly and will be dealt with appropriately; and

- ◆ fulfil our statutory obligations under current and subsequent legislation. This includes the allocation of resources, financial and human, as required.

Responsibility for the Implementation of this Policy

We believe that it is everyone's responsibility to ensure this policy is implemented. Roles and responsibility are as follows:

- The Centre Manager has overall responsibility for ensuring that sufficient resources are available to facilitate the effective implementation and maintenance of this policy.
- The Senior Management Team are responsible for implementing the effectiveness of this policy; and will give their full support to identifying and changing corporate processes and practices which deny or limit fair and equal treatment;
- All employees are responsible for ensuring that they comply with this policy in all of their dealings with customers, suppliers, partner organisations, local communities, and with each other.

This policy and the principles underlining our commitment to equality and diversity, do not just apply to places of work, but also apply to any work-related activities, for example social events or travelling on business.

This policy applies to anyone working at the Elmhouse Training including freelance and temporary workers, work experience students, consultants and contractors, as well as recruitment candidates. Elmhouse Training would discourage contracting with those sub-contractors who do not meet the same standards.

Making a Complaint

Employee

If an employee, customer, supplier or partner organisation experiences any form of discrimination, harassment, bullying or victimisation, they must bring this to the attention of the HR Manager responsible for equality and diversity. If it is not appropriate to do so, they must contact the Corporate Services and Finances Director, who will advise them on the process for making a complaint.

If an employee, customer, supplier or partner organisation believes they have **observed** a colleague experiencing any form of discrimination, harassment, bullying or victimisation, they must bring this to the attention of the Centre Manager responsible for equality and diversity.

Consequences of Not Adhering to Equality and Diversity within the Company

All employees, irrespective of their job or seniority, will be given guidance and instruction, through induction and mandatory training each year, as to their responsibility and role in promoting equality of opportunity and not discriminating unfairly or harassing colleagues or job applicants, nor encouraging others to do so or tolerating such behaviour. Disciplinary action, including dismissal, may be taken against any employee found guilty of unfair discrimination or harassment. Any breach of this policy could lead to disciplinary action under the normal disciplinary procedures for Elmhouse Training sub-contractors.

Responsibility for the Monitoring of this Policy

Progress will be monitored by the Centre Manager who will also ensure that the policy is reviewed and updated, and will communicate achievements to all employees, customers and major stakeholders.