



Educ8 Training Group of Companies

Equality, Diversity and Inclusion Policy and Procedure

Document version control

Document title:	Equality and Diversity Policy and Procedure
Document status:	Final
Version number:	6.7
Date:	17/04/2026
Author:	SMT
Approved by:	Board
Review date:	April 27

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1. Introduction

Educ8 Training Group (“**ETG**”) is one of the largest independent training providers in England and Wales. All companies within the ETG group uphold the same company Vision, Mission and Core Values and follow our group policies and procedures.

At the date of this policy these companies are:

- Educ8 Training Group Limited, registered number 10865705.
- Haddon Training Limited, registered number 04773490.
- Aspire and Learn Ltd, registered number 08784755.
- Educ8 Ltd, registered number 05059754.

Any reference to “ETG” throughout this policy includes all the companies named above.

For the purpose of this policy the reference to “**Funding Bodies**” includes the Welsh Government/Medr, DfE/DWP and local authorities.

2. Purpose

As a leading provider of education and training and a holder of public and private funds, ETG Group and its sub-contractors have a duty to ensure that everyone has equal and fair access to its services and that cultural diversity is celebrated.

ETG goes beyond compliance with equality law and aspires to be the champion of best practice in all aspects of equality, diversity and inclusion. ETG and its sub-contractors aim to create an inclusive environment where all can learn, work and reach their full potential in an environment free from bullying, harassment and discrimination.

This policy and procedure is set in the context of the company mission statement and is firmly embedded in the core business values. It supports the company’s aim of actively promoting and maintaining a positive ethos and image that represents ETG and its sub-contractors commitment to equality, diversity and inclusion.

The purpose of this policy and procedure is to outline the organisations approach to fulfilling its commitments and make it clear to all involved what they can expect from ETG and it’s sub-contractors.

This policy also confirms ETG’s commitment to creating a psychologically safe environment where individuals feel able to raise concerns, challenge inappropriate behaviour, and contribute fully without fear of detriment.

3. Scope

This policy and procedure relates to employment practices and education and training both within the organisation and within the client groups it supports. The policy and procedure applies to employees, learners, employers, visitors and sub-contractors. This policy and procedure cannot be viewed in isolation and must be read in conjunction with the following policies:

Educ8

- Anti Bullying and Anti Harassment Policy
- Complaints Policy and Procedure
- Continuous Professional Development Policy
- Freedom of Speech and Expression Policy and Procedure
- Health and Safety Policy
- Intervention Policy
- Prevent Policy and Procedure
- Safeguarding Policy and Procedure
- Safer Recruitment Policy
- Teaching, Learning and Assessment Policy
- Access Arrangements & Special Considerations Policy
- Appeals Policy
- Visitors and Events Policy and Procedure
- Welsh Language and Culture Policy
- Whistleblowing Policy and Procedure
- Additional Learner need Policy

Haddon Training additional

- Haddon Training Appeals Procedure
- Haddon Training Complaints Policy
- Haddon Training Exam & Invigilation Policy
- Haddon Training Additional Learning Support Policy and Process
- Initial Assessment of Prior Learning Procedure
- Training & Development Policy
- ECHP and ALS Process (HT)

ETG and its sub-contractors will comply with all reasonable requirements from the Welsh Government/Medr, DfE/DWP, Estyn, Ofsted and other regulatory bodies.

Subcontractors are required to comply with this policy as a condition of contract. ETG will monitor compliance through quality assurance activities, contract management processes, data review and periodic audits. Where non-compliance is identified, ETG will require corrective actions and may apply contractual remedies up to and including termination of contract.

4. Impact on the Learner

The implementation of this policy and procedure will support the creation of a safe learning environment, where learners are treated fairly and with respect. This will ensure that all learners, no matter their background, values or beliefs are able to learn effectively, achieving their full learning potential.

ETG will take steps to identify and remove barriers to learning, including barriers arising from discrimination, inequality, prejudice, bias (conscious or unconscious), and inaccessible learning environments or practices.

5. Definitions

Equality is about creating a fairer society where everyone can participate and has the same opportunity to fulfill their potential. It is about everyone's right to live in a society free from discrimination and harassment. Equality means recognising that people's circumstances differ and allocating support and adjustments proportionately to achieve fair outcomes.

Diversity is about respecting, valuing and celebrating aspects that make each individual unique. It is about recognising the contribution individuals make to society because of these different aspects, not in spite of them.

Inclusion means creating an environment in which individuals feel welcomed, respected, supported and able to participate and thrive, and where difference is valued and barriers to participation are actively removed.

6. Legal and regulatory framework

ETG is committed to promoting equality, diversity and inclusion in line with relevant national frameworks across England and Wales.

- **England:** This commitment is guided by the Inclusive Britain Strategy (2022), the Public Sector Equality Duty, the Children and Families Act 2014, and the SEND Code of Practice (England). ETG works in line with these frameworks to support learners with Special Educational Needs and Disabilities (SEND), including working with appropriate external agencies where required.
- **Wales:** This commitment is aligned to the Public Sector Equality Duty, the Anti-Racist Wales Framework, and the Additional Learning Needs and Educational Tribunal (Wales) Act 2018. While the Act is not mandatory within work-based learning, ETG has adopted its principles where reasonably practicable. This includes working collaboratively with external agencies such as local authorities, governing bodies and referral units as required. Delivery is supported through ETG's Anti-Racist Action Plan.

ETG is fully aware of its obligations within the following legal framework, covered by the Equality Act 2010 and its predecessor legislation, and is committed to meeting its legal requirements. The Act, and this policy and procedure, identify nine protected characteristics:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnerships
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

The Act defines the following types of illegality, and this policy recognises these:

- **Direct discrimination** is when someone is treated unfairly or less favourably than another individual because they have a protected characteristic.
- **Indirect discrimination** relates to the application of processes, policies or procedures that intends to treat everyone equally but disadvantages individuals from a protected group.

- **Perception discrimination** is discrimination against an individual because they are perceived to have a protected characteristic (whether or not that perception is correct).
- **Associative discrimination** is discrimination against an individual because of their association with someone who has a protected characteristic
- **Harassment** happens when someone who behaves in such a way that their conduct creates an environment that is hostile, degrading, humiliating or intimidating.
- **Harassment by third parties** (e.g., visitors, employers, customers, service users) will not be tolerated. ETG will take reasonable steps to prevent and respond to such behaviour, including taking action to protect staff and learners and, where appropriate, ending engagement with individuals or organisations.
- **Victimisation** happens when someone experiences disadvantage because they have either directly made a complaint or allegation of discrimination or supported someone else with this process.
- **Discrimination arising from a disability** occurs when someone is treated less favourably due to their disability, where such treatment cannot be justified.

ETG also recognises its duties to take proactive steps to prevent harassment (including sexual harassment) and to maintain learning and working environments that are safe, respectful and inclusive.

ETG recognises neurodiversity as part of learner diversity and is committed to inclusive practices that support learners with conditions such as dyslexia, ADHD, autism and other cognitive differences through appropriate support and adjustment.

ETG will apply the principles of early identification, inclusive practice and reasonable adjustments to support learners with additional learning needs, in line with ETG's Additional Learning Support arrangements.

ETG will ensure compliance with the requirements of any future equality legislation.

Where equality monitoring data is collected, ETG will do so lawfully, fairly and transparently, applying data minimisation and appropriate safeguards, and using the information to improve access, participation and outcomes.

7. Strategic Aims

ETG is committed to promoting equal opportunities and celebrating cultural diversity and inclusion across all aspects of the business. ETG and its sub-contractors will ensure policies, procedures and processes do not, directly or indirectly, discriminate against individuals or groups with 'protected characteristics'.

ETG and its sub-contractors recognise the under-representation of minority groups within its learner population and are committed to addressing this through working with learners, employers and other stakeholders to remove potential barriers and to actively promote learning opportunities to these minority groups.

ETG and its sub-contractors are committed to:

- Eliminating discrimination, harassment and victimisation
- Advancing equality of opportunity between those who share a relevant protected characteristic and those who don't.

- Fostering good relations between those who share a relevant protected characteristic and those who don't.
- Create conditions which contribute to the full development and potential of all its members.
- Create an environment which promotes equality and inclusion of opportunity in education and employment and actively celebrates diversity.
- Create a climate where employees and learners are empowered to have the confidence to challenge acts and behaviour which contravene ETG and its sub-contractors equality, diversity and inclusion policy and the law.
- Respect equally all employees, learners and users of its services.
- Judge fairly and appropriately each applicant for a job vacancy, promotion or training course.
- Make reasonable adjustments to ensure equality of opportunity
- Promote teaching and learning styles and resources which fully encompass the concepts of equality, diversity and inclusion.

ETG will set and review measurable objectives to improve equality of access, participation, achievement and progression, and will use evidence (including learner voice and staff feedback) to inform continuous improvement.

ETG and its sub-contractors support the following aims:

7.1 To raise awareness of equality, diversity and inclusion issues, actively promoting the ethos of equality, diversity and inclusion to staff, learners and employers to tackle discriminatory practices in the workplace by:

- Ensuring all staff are fully aware of their responsibilities through clear emphasis within job descriptions, employee handbooks, effective staff induction and annual update training in equality, diversity and inclusion.
- Providing information, via Learner and Employer Handbooks and induction materials, embedding equality and diversity matters within all areas of teaching, learning and assessment as appropriate
- Ensuring all strategies, policies and procedures promote inclusion and do not place any disadvantage on those from the protected characteristic groups.
- Actively tackling discrimination and supporting others to do so where appropriate.
- Ensuring staff understand how to report concerns, how concerns will be handled, and the support available to individuals affected by discrimination, harassment or bullying

7.2 To increase participation and achievement of under-represented minority groups within the learning sector areas delivered by:

- Tackling under-representation through promotion of available courses to young people, adults, those from minority and disadvantaged groups and those from rural areas.
- Regularly attending Careers and school open days to promote courses to young people, including those from minority or disadvantaged groups.
- Developing progression routes for unemployed and young learners which positively address under-representation in subject sectors.
- Developing relationships with 'link workers', charities and third sector organisations to widen participation of minority groups.
- Developing a range of promotional case studies for displaying at centres
- Using promotional materials which reflect and reinforce the diversity of society and where appropriate counter stereotypes.
- Ensuring the early identification of potential barriers to learning and providing support in order to

succeed in learning.

- Gathering learner feedback through learner interviews, OTLA's and learner/employer surveys
- Liaising with learners and employers to develop action plans to address any negative trends identified.
- Working with employers to promote inclusive workplaces and to address barriers that may affect recruitment, retention and progression of apprentices and learners from under-represented groups.

7.3 To ensure parity of achievement for all groups of learners through:

- Frequent monitoring of appropriate OKR's to measure participation and achievement rates of learners from specified groups including learners from ethnic minority backgrounds, age, gender, Welsh speaking and those with additional learning needs
- More detailed evaluation of achievement and participation trends which are externally benchmarked.
- Annual and periodic evaluation of sub-contractor participation and achievement by age, ethnicity and disability group through the ETG contract management review
- Effective evaluation of Learner Voice Wales and achievement data results by key demographics.
- Evaluation of performance trends as part of the self-assessment process with actions incorporated within the Quality Development Plan.
- Where gaps are identified, ETG will agree targeted actions, timescales and owners, and will monitor impact.

8. Prevent Duties

ETG and its sub-contractors recognise the importance of implementing its duties to the Prevent agenda, whilst ensuring that these actions do not have a negative impact on any learners or members of staff based on one or more of the protected characteristics. Risk assessments in relation to these duties will be reviewed to ensure the avoidance of any negative impact on protected groups as far as possible. Further information is available in the ETG Safeguarding and Prevent policies and procedures.

ETG will ensure Prevent-related practice is proportionate, evidence-based and applied fairly, and that staff receive appropriate training to support consistent and non-discriminatory decision-making

9. Responsibilities

The following outline the requirements of ETG; however they may be adapted to suit individual organisational structures without diluting the overarching responsibility.

9.1 Board of Directors:

- Ensuring ETG fully meets its legal requirements.
- Ensuring the policy and procedure and associated action plan, meets the requirements of relevant legislation.
- Ensuring effective implementation and monitoring of strategy and action plan.
- Ensuring the strategy is continuously reviewed and that all employees receive adequate training.

9.2 Operational Board

- Providing a consistently high-profile lead on all issues contained within the policy and procedure.
- Ensuring all aims and objectives of the policy and procedure are effectively implemented.

- Ensuring all employees are fully aware of their individual and collective responsibilities.
- Providing appropriate training and development activities to ensure employees have the skills and knowledge to support this policy and procedure.
- Setting and monitoring of targets associated with widening participation.
- Ensuring that appropriate action is taken against anyone found to be in breach of the content of this policy and procedure.
- Ensuring subcontractor compliance is monitored and reported through contract management and quality assurance processes.

9.3 Managers:

- Proactively communicating commitment to this policy and procedure to learners, employers, employees and external stakeholders.
- Ensuring their team members are made aware of their responsibilities and are provided with appropriate training and support.
- Taking action against any discriminatory practices.
- Not discriminating unfairly when involved in recruitment, promotion and performance management of employees.
- Providing services which fully meet the needs of our diverse client group
- Taking prompt action when concerns are raised, including escalating to HR/Quality/Safeguarding as appropriate and ensuring support is offered to those affected.

9.4 Employees:

- Practically demonstrating the core principles of equality, diversity and inclusion by treating others with dignity and respect.
- Effectively identifying and challenging discriminatory behaviour and attitudes.
- Actively participating and contributing to creating an inclusive learning environment that values difference.
- Ensuring that equality, diversity and inclusion is effectively integrated into the professional practice
- Maintaining an awareness of equality legislation by attending employee development programmes.
- Taking equal responsibility in ensuring that we create a learning environment where people are valued and respected.
- Effectively challenging any form of discrimination.
- Expressing opinions constructively with sensitivity and respect.
- Speaking out if they witness or are aware of discrimination, bullying, unfair treatment or harassment.
- Cooperating with investigations into alleged breaches of this policy and maintaining confidentiality where required

9.5 Learners:

- Taking equal responsibility in ensuring that we create a learning environment where people are valued and respected.
- Effectively challenging any form of discrimination.
- Expressing opinions constructively with sensitivity and respect.
- Speaking out if they witness or are aware of discrimination, bullying, unfair treatment or harassment.
- Learners can raise concerns through their tutor/assessor, the learner support team, the complaints

process, or via safeguarding routes where there is risk of harm.

10. Implementation

Appropriate training and development activities will be provided to ensure employees are equipped with the skills and knowledge to fully implement this policy and procedure. An annual impact assessment will be undertaken to ensure the principles of this equality, diversity and inclusion policy and procedure is embedded into all processes and procedures.

ETG will ensure subcontractors receive appropriate information and expectations regarding this policy and that compliance is included within induction and ongoing quality assurance activity.

11. Communication

This policy and procedure will be made available in hard copy in every location and in an electronic format on the ETG Team8. Training activities will be introduced to ensure all employees are fully conversant with the content of this policy and procedure. Employers and learners will be provided with access to this policy and procedure at the start of the training programme.

Alternative formats and reasonable adjustments will be considered on request to ensure accessibility for all users.

12. Complaints procedure

ETG and its sub-contractors will not tolerate abuse, prejudice, harassment or bullying and will use the appropriate procedures to investigate and address any complaints. All complaints will be taken seriously and dealt with in a timely and sensitive manner, in accordance with the ETG Complaints Policy and Procedure.

Where a complaint relates to staff conduct, ETG may use its grievance and/or disciplinary procedures (as appropriate). Where a concern relates to safeguarding or risk of harm, it will be managed in line with ETG safeguarding procedures.

No individual will be treated less favourably for raising a concern in good faith, and victimisation will be treated as a serious matter.

13. Monitoring and Review processes

This policy and procedures will be reviewed on an annual basis, and where there are changes to regulatory requirements, by the Senior Management Team.

Data and performance targets associated with this policy and procedure will be reviewed by the Quality Manager within the self-assessment process.

Monitoring will include, where appropriate:- participation, achievement and progression by key demographic groups- learner voice and staff feedback- complaints and incident themes relating to discrimination, harassment and bullying- subcontractor performance and compliance indicators. Findings will be used to inform improvement actions within the Quality Development Plan and/or relevant action plans, and progress will be reported through governance arrangements.