

# **Equality, Diversity and Inclusivity Policy**

**Section 1 - Introduction & Scope and Policy Statement**

**Section 2 - Addressing Discrimination, Harassment and Victimisation**

**Section 3 - Definitions of Discrimination and Disability**

**Section 4 - Monitoring and Relevant Legislation**

# **Section 1 Introduction and Scope and Policy Statement**

## 1.1 Introduction and Scope

1.1.1 This policy describes the way we approach matters relating to equality, diversity and inclusivity relating to all employers, apprentices, learners, colleagues and candidates.

1.1.2 The policy outlines the steps we will take to promote positive attitudes towards Equality, Diversity and Inclusivity to ensure all those working with, studying at or applying to study with us are treated fairly and with dignity and respect.

1.1.3 This policy provides assurance we will comply and are aligned with current equality legislation, such as the Equalities Act 2010.

1.1.4 The policy covers all behaviours including online platforms such as online learning, email, any communication systems and across any social media.

## 1.2 Policy Statement

1.2.1 We are committed to a policy of equal opportunities for all employees, apprentices, learners, colleagues, and candidates and shall always adhere to such a policy.

1.2.2 We ensure to the best of our ability no-one is discriminated against (directly or indirectly), treated less favourably or face any harassment or victimisation in relation to any of the protected characteristics including sex, sexual orientation, gender reassignment, marital or civil partnership status, age, disability, colour, race, nationality, ethnic or national origin, religion or belief, political beliefs or membership or non-membership of a Trade Union or spent convictions, and places an obligation upon all staff to respect and act in accordance with the policy.

1.2.3 We shall not discriminate unlawfully when deciding which colleague/consultant is submitted for a contracted assignment, or in any terms of employment, contract, or terms of engagement.

1.2.4 We ensure each colleague/consultant is assessed only in accordance with their merits, qualifications, and ability to perform the relevant duties required by the assignment.

1.2.5 All our learner and apprentice applicants regardless of race, gender, sexual orientation, age, religion and disability or offender background will be given equal consideration during the selection and recruitment process.

1.2.6 Any test used in the selection or recruitment process will not be discriminatory and will be without bias.

1.2.7 We will not accept instructions from clients that indicate an intention to discriminate unlawfully.

1.2.8 We will review this policy on an on-going basis to cover all aspects of recruitment and to avoid unlawful or undesirable discrimination

1.2.9 This Equal Opportunities Policy also covers the treatment of colleagues who work on a part-time basis. We recognise it's an essential part of this policy that part time colleagues

are treated on the same terms as full-time colleagues (albeit on a pro rata basis) in matters such as rates of pay, holiday entitlement, maternity leave, parental and emergency leave. Tiro also recognises part time colleagues must be treated the same as full time colleagues in relation to training and redundancy situations.

1.2.10 This policy prohibits unlawful harassment by any colleague/apprentice/learner of Tiro. Examples of prohibited harassment are:

- Verbal or written conduct containing derogatory jokes or comments,
- Slurs or unwanted sexual advances
- Visual conduct such as derogatory or sexually orientated posters,
- Photographs, cartoons, drawings or gestures,
- Physical conduct such as assault, unwanted touching, or any interference because of sex, race or any other protected basis,
- Threats and demands to submit to sexual requests as a condition of continued employment or to avoid some other loss, and offers of employment benefits in return for sexual favours
- Retaliation for having reported or threatened to report harassment.

## **Section 2 Addressing Discrimination, Harassment and Victimisation**

## 2.1 Addressing Discrimination, Harassment and Victimization

2.1.1 We have zero tolerance of harassment and bullying in any form.

2.1.2 We strive to actively challenge and tackle all forms of prejudice, discrimination and stereotypical attitudes

2.1.3 We will deal with any allegations of discrimination, harassment and victimisation sensitively and investigate promptly, fairly and thoroughly.

2.1.4 We are committed to providing training for all colleagues in equal opportunities practices and to understand disabilities to limit any direct or indirect discrimination.

2.1.5 Treat any form of discrimination, harassment or victimisation carried out by an individual as a matter for possible disciplinary action.

2.1.6 All complaints will be taken seriously by the person receiving them and the appropriate process will be followed to respond to the complaint. Complaints provisions are subject to regular review.

2.1.7 Any student, customer, client or colleague who feels they are being discriminated against for the reasons listed in paragraph 1.2.2 should raise the matter formally or informally, as appropriate with one of their teaching staff, or the Director of Learning in the first instance.

2.1.8 The Complaints and Conflict Resolution policy and procedures are available for cases of alleged discrimination.

2.1.9 As far as is reasonably possible, no age requirements will be stated in any job advertisements on behalf of the company. We will request age as part of its recruitment process but information will not be used as selection, training or promotion criteria or in any detrimental way and is only for compilation of personal data, which the company holds on all colleagues.

2.1.10 We will not discriminate against a job applicant, learner, apprentice, or employee on the grounds of disability:

- In the arrangements i.e. application form, interview, and arrangements for selection for determining to whom a job should be offered; or
- In the terms on which employment or engagement of temporary workers is offered; or
- By refusing to offer, or deliberately not offering the disabled person a job for reasons connected with their disability; or
- In the opportunities afforded to the person for receiving any benefit, or by refusing to afford, or deliberately not affording them any such opportunity; or
- By subjecting them to any other detriment (detriment will include refusal of training, transfer, demotion, reduction of wage, or harassment).

2.1.11 We will make career opportunities available to all people with disabilities and every practical effort will be made to provide for the needs of colleagues, learners, apprentices, job applicants and clients.

2.1.12 Wherever possible we will make reasonable adjustments as appropriate and proportionate and improve means of access for colleagues with disabilities. However, this may not always be feasible.



## **Section 3 Definitions of Discrimination and Disability**

## 3.1 Definition of Discrimination

3.1.1 Unlawful discrimination occurs in the following circumstances:

3.1.2 Direct discrimination occurs where one individual treats or would treat another individual less favourably on grounds of sex, sexual orientation, gender reassignment, marital or civil partnership status, disability, age, colour, race, nationality, ethnic or national origin, religion or belief, political beliefs (“the protected categories”).

3.1.3 It is unlawful to discriminate against a person on the grounds that they are members of a protected category.

3.1.4 A claim of indirect discrimination arises when an employer applies a provision, criterion or practice generally, but which is such that a proportion of persons in a protected category who can comply with it is considerably smaller than the proportion of persons who are not in that protected category.

## 3.2 Definitions of Disability

3.2.1 Direct discrimination against a person with a disability occurs where, if for a reason which relates to the person's disability, an individual:

- Treats them less favourably than they treat, or would treat others to whom that reason does not or would not apply; and
- The employer cannot show that the treatment in question is justified, Or
- If on the ground of a disabled person's disability, they treat the disabled person less favourably than they treat or would treat a person not having that disability, whose relevant circumstances, including their abilities, are the same as, or not materially different from, those of the disabled person. This type of direct discrimination can never be justified.

## Section 4 - Monitoring and Relevant Legislation

## 4.1 Monitoring

4.1.1 Responsibility for reviewing and evaluating the effectiveness of this Policy lies with the Academic Board.

4.1.2 The senior management team have direct responsibility to take an active and visible lead in ensuring equality and diversity and ensure equality and diversity data is embedded within development plans.

4.1.3 The effectiveness of this policy will be monitored through reporting or any complaints or grievances and through regular collection and analysis of data that should be as unobtrusive to individuals and commensurate with this objective.

## 4.2 Legislation

4.2.1 We will meet all statutory obligations under relevant legislation for this policy and, where appropriate, anticipate future legal requirements. This will be informed by:

The Equality Act (2010) and associated secondary legislation.

Criminal Justice and Immigration Act (2008)

The Racial and Religious Hatred Act (2006)

The Civil Partnership Act (2004)

The Gender Recognition Act (2004)

Criminal Justice Act (2003)

The Human Rights Act (1998)

The Protection from Harassment Act (1997)

Special Education Needs and Disability Act (2001)

## Appendix A - Change Control Log Template

Version	Details of amendments	Author	Formal approval required	Approved by	Date of approval	Date adopted by the Board
V.1	N/A	Nathan Dixon, Higher Education Programme Lead and Support Tutor	Y	Charlotte Blant, CEO	May 2022	May 2022
V.2	Language	Kathryn Jeacock				