



Education & Skills  
Funding Agency



European Union  
European Social Fund  
Investing in jobs and skills

# The Equality and Diversity Policy

Including:

Disability, Race, Age, Gender, Sexual Orientation,  
Religion or Belief, Transgender, Maternity,  
Pregnancy, Marriage, and Civil Partnership



**Issued: September 2017**

## Equality and Diversity Policy

### Terminology

The Term ....	Will hereinafter refer to...
<b>Directors</b>	The Directors of Consortia Training.
<b>Company Directors</b>	The Directors of Consortia Training Funded Organisations
<b>Personnel</b>	Any staff employed by Consortia Training and/or the Funded organisations and partner organisations that are responsible for delivery or support of Consortia Training Funded Learners.
<b>Partner Organisations</b>	Employers and work placement providers of Consortia Training Funded Learners.

### Purpose

#### **Statement of Intent**

Consortia Training is fully committed to the principle of equality and diversity in recruitment, employment, training and assessment. We oppose all forms of unfair direct or indirect discrimination.

Consortia Training values the individuality of all learners and aims to give them every opportunity to achieve their potential. We positively welcome the diversity of personnel, learners and partners in relation to disability, race, age, gender, sexual orientation, religion or belief, transgender, pregnancy, maternity and marriage and civil partnership. Every learner will have their varied experiences and needs taken in account with high expectations for all. A broad and balanced curriculum will be offered. Consortia Training will seek to remove any barriers to learning and participation. The principle of fairness, justice and equal access for all through education and training will be promoted through adaptation to meet individual learner needs.

Our fundamental principle is to ensure everyone works in an atmosphere free from harassment, intimidation and unlawful discrimination. All people will be valued regardless of their economic circumstances, disability, race, age, gender, sexual orientation, religion or belief, transgender status, pregnancy, maternity, partnership or marital status. In the wider context, we will provide the opportunity for all to access, within reason, facilities and resources of Consortia Training funded organisations and partner organisations. We will actively challenge personal prejudices and stereotypical views whenever they occur.

**Consortia Training is committed to promoting equality and diversity for all people particularly those who will be:**

- Seeking and using Consortia Training services;
- Employees or prospective employees of Consortia Training, its Funded organisations and partner organisations that supply goods and services

Consortia Training believes that the quality of services is enhanced when the makeup of the workforce reflects that of the population served. We will promote understanding and harmony between people. We will work with other parties and organisations to eliminate discrimination, harassment and attacks on any group

or individual. Our mission reflects the company's ethos of equality and diversity and compliance with the Equality Act 2010.

**Consortia Training will seek to ensure equality and diversity through:**

- Forging positive partnership relationships who share our mission
- Ensuring that services will be equally accessible and relevant to the needs of different client groups; making reasonable adjustments where necessary.
- Raising awareness and monitoring appropriate recruitment, employment, development, promotion, redundancy or disciplinary practices and procedures that are embedded and upheld.
- Development of policies including consultation with groups affected.
- The training of all personnel responsible for Consortia Training funded delivery.
- Publicity for and access to services in relevant formats where necessary.
- Appropriate materials, teaching, learning, and documentation.
- Appropriate accurate, fair and reliable assessment in line with awarding body guidelines.
- Appropriate links within the community and other partnership arrangements.
- Set specific, measurable Equality objectives, which will be regularly monitored and developed.

**The policy of Consortia Training is to combat any form of prejudice or discrimination and fulfil its statutory legal obligations under the:**

- **2010 Equality Act** – which sets out the general, public and specific duties for the protection against direct and indirect discrimination and harassment of any person because of any personal protected characteristics, namely:

Disability, Race, Age, Gender, Sexual Orientation, Religion or Belief, Transgender status, Maternity, Pregnancy, Marriage and Civil Partnership.

Within the Act, compliance is required under the following aspects:

- **Direct Discrimination** Occurs when someone is treated less favourably than another person in relation to a protected characteristic.
- **Indirect Discrimination** Occurs where there is a rule, policy or practice that applies to all and may disadvantage someone with a protected characteristic (age, race, religion or belief, marriage and civil partnership, sexual orientation, disability, gender reassignment and sex).
- **Associative Discrimination** Occurs where a person may be directly discriminated against due to them being associated with a person with a protected characteristic (age, race, religion or belief, sexual orientation, disability, gender reassignment and sex).
- **Perceptive Discrimination** Occurs where a person is directly discriminated against as others believe they have a particular protected characteristic (age, race, religion or belief, sexual orientation, disability, gender reassignment and sex).
- **Harassment** - occurs where a person is subject to unwanted conduct in relation to a protected characteristic. Company employees are able to complain about behaviour they find offensive even if it is not directed at them (all protected characteristics are supported apart from pregnancy, maternity, marriage and civil partnerships).

- **Harassment by a third party** - employers are potentially liable for harassment of their personnel by a third party (e.g. customers or clients) - Liability will only occur when harassment has occurred on at least two previous occasions; the employer is aware and has not taken reasonable steps to prevent it from happening again. Uncovered characteristics are marriage, civil partnerships, pregnancy and maternity.
- **Victimisation** - occurs where a person is treated badly because they have made/supported a complaint or grievance under the Equality Act or because they are suspected of doing so (all characteristics are protected. An employee is not protected if the complaint is malicious or untrue.
- **Positive Action** - allows you to act if you think employees or job applicants who share a particular protected characteristic suffer a disadvantage connected to the characteristic, or if their participation is disproportionately low. This is voluntary and a formal decision by directors would be made before evoking.
- **Pre-employment Health Related Checks** limits the circumstances when you can ask health related questions before you have offered the job. You can ask if any reasonable adjustment will be required for the selection process and ask questions to decide whether the applicant can carry out a function essential to the job role, but not related for example to travelling to work etc.
- **Extension of Employment Tribunal Powers** Even if an employee has left a company prior to a tribunal, they can recommend changes within the organisation and the employer is required to comply.
- **Equal Pay Direct Discrimination** - the Equality Act retains the framework that was previously in place. This means that in most circumstances a challenge to pay inequality and other contractual terms and conditions still can be made by comparison with a real person of the opposite sex in the same employment. However, a change in the Equality Act allows a claim of direct pay discrimination be made, even if no real person comparator can be found. This means that a claimant who can show evidence that they would have received better remuneration from their employer if they were of a different sex may have a claim, even if there is no one of the opposite sex doing equal work in the organisation. This would be a claim under sex discrimination.
- **Pay Secrecy** - the Act makes it unlawful for you to prevent or restrict your employees from having a discussion to establish if differences in pay exist, that is related to protected characteristics. It also makes terms of the contract of employment that require pay secrecy unenforceable because of these discussions. An employer can require their employees to keep pay rates confidential from some people outside the workplace, for example a competitor organisation.  
<http://www.acas.org.uk/index.aspx?articleid=3017>

The following key Acts/policy/procedure are to be noted in addition to the Equality Act 2010:

- **1997 The Protection against Harassment Act** (and stalking regulations which came into force October 2012) - introduced new fines and sentences for harassment and makes harassment a criminal offence.  
<http://www.legislation.gov.uk/ukpga/1997/40/contents>  
<https://www.gov.uk/government/publications/a-change-to-the-protection-from-harassment-act-1997-introduction-of-two-new-specific-offences-of-stalking>

- **1998 Human Rights Act** – applied directly to public authorities and incorporated the European Convention on Human Rights into UK law.  
<http://www.equalityhumanrights.com/your-rights/human-rights/what-are-human-rights-act>
- **Prevent Strategy** – part of the government’s CONTEST strategy to target the threat of terrorism and violent extremism. The programme is focussed on non-criminal activity and is intended to safeguard vulnerable people from being exploited by violent and extreme ideologies. We must ensure that all learners have freedom of speech; however supporting them to act on this in a non-extremist way. Learners must be encouraged to respect others views/opinions/beliefs etc in special regard to those with protected characteristics detailed in the Equality Act 2010. See PREVENT Policy Guidance for more information.

**Consortia Training will actively develop procedures which monitor the positive involvement of all it serves, funds and forms partnerships with to:**

- Treat everyone equally and in line with current legislation, regardless of disability, race, age, gender, sexual orientation, religion or belief, transgender status, pregnancy, maternity, marital or partnership status or background e.g. ex- offenders (in line with legal requirements).
- Ensure that no employee, applicant for employment to a Consortia Training funded position whether by a subcontractor, partner, learner or customer is disadvantaged by conditions or requirements, which cannot be shown to be relevant to the job.
- Oppose sexual harassment, defined as unwanted conduct of a sexual nature or other conduct based on sex, affecting the dignity of women and men at work or any other forms of harassment.
- Oppose harassment where individuals are subjected to a hostile working environment because of their age, disability, gender re-assignment, or transgender status, race, religion or belief, sex, sexual orientation, marriage, civil partnerships, pregnancy or maternity.
- Challenge any unacceptable behaviour which breaches the Equality and Diversity Policy. If necessary, evoke disciplinary procedures or legal action.
- Ensure that the resources, talents and skills of employees funded by Consortia Training are fully utilised and are carried out in line with their contractual duties in line with their job description, which makes the importance of equality & diversity clear.
- Oppose any forms of harassment and bullying within the working environment.
- Recognise that people are all different. Respect and celebrate the individual for their contribution to the organisation or community. Plan to make reasonable adjustments to get the best out of every situation for each individual. Encourage all to reach their full potential.

### **Persons involved**

Responsibility for the detailed implementation of this policy rests with the directors of Consortia Training. The Directors have the responsibility to review the policy and impact assess its effect by consulting with others and recording the outcomes.

## Funded organisations

All funded organisations of Consortia Training have a responsibility to ensure the equality and diversity of their provision. Funded organisations will choose to either adopt this policy or provide an alternative policy acceptable to Consortia Training. All funded organisations will be required to sign an acceptance to this policy should they choose to adopt.

## Personnel Responsible for Consortia Funded Delivery

The Consortia Training Directors have overall responsibility to ensure that all persons covered under this document will be treated in line with this policy.

All applications for work, where employment or subcontract arrangements are partially or fully Consortia Training funded, will be considered regardless of religious belief, political opinion, disability, skin colour, age, gender, race, nationality, ethnic origin, national origin, marital or partnership status, sexual orientation, background, but purely on their ability to perform the role and responsibilities. A statistical record of all applicants' diversity in relation to gender, age and ethnicity will be retained. Personal information of this nature will be required for monitoring purposes only and it is made clear to applicants that such information is not used in the selection process.

## Learners

Consortia Training, subcontractor funded Trainers/Assessors, in collaboration with other partners involved in the training, assessment and support of learning, all have a responsibility for following and maintaining the ethos of this policy. This process will be agreed and implemented by the Consortia Training Directors supported by the Quality Team.

## Time-scale

This policy has an ongoing process of implementation.

## Related Documentation

Consortia Training will ensure they maintain records for and monitor...

## Organisational

Record	Purpose to record evidence of ...	Frequency
Policy Review	A summary of policy changes, any actions taken because of the review, the date of the review and name of the reviewer.	As outlined in each policy.
Impact Assessment (equality and diversity check)	The outcomes of all policy impact assessments.	As outlined in each policy.
Subcontracting Agreement	The partnership working agreement to ensure equality and diversity has a key focus within all arrangements.	Annual renewal in July.

## Personnel Responsible for Consortia Funded Delivery

Record	Purpose to record evidence of ...	Frequency
Personnel Induction	Personnel receiving an introduction to equality & diversity.	On commencement of personnel employment.

## Equality and Diversity Policy

Acceptance of Consortia Training Policies	Personnel acceptance / adherence to the equality and diversity policy.	On commencement of personnel employment.
Minutes of Course Team Meetings / Communications	Equality & diversity as an ongoing item of meetings/awareness raising.	Ongoing
Personnel Appraisal	Personnel satisfaction to organisational equality and diversity and any training requirements identified.	Annually
Personnel CPD	Training and development in equality and diversity.	Annually

### Learners Funded by Consortia Training

Record	Purpose to record evidence of ....	Frequency
Learner Induction	The learner receiving and introduction to equality and diversity.	Learner commencement on programme.
Learner Review - check	Learner's satisfaction with their treatment in relation to equality and diversity.	Minimum of every 12 weeks.
Learner Review – inform	Raising awareness on issues relating to equality and diversity.	Minimum of every 12 weeks.
Confidentiality Form	Confidential conversations with learners, which will be sensitive in nature, or information is only shared with certain people.	As necessary.
Learner CPD	Training and development in equality and diversity	Annually (minimum)

### Employers

Record	Purpose to record evidence of ....	Frequency
Training Agreement – Employer/ Workplace Provider	Detailed coverage of equality, diversity, and expectations of the employer.	Employers sign up to annually.
Recruitment Monitoring	Applications, interviews and employment outcomes in relation to learners for all aspects of the personal characteristics covered under the Equality Act 2010	In all cases when learners are recruited to a salon.
Communications / Updates	Information and awareness raising communications on equality & diversity distributed to employers.	Annually (minimum)
Learner Review	This includes a focus on equality and diversity during learner reviews of which employers or their representatives will be involved.	Minimum of every 12 weeks.

## Training and Induction to the Policy

### **Management**

The Directors will ensure all funded organisations have a copy of the Equality and Diversity Policy and a shared understanding and ethos. Sub-contracting partners will agree to either adopt the Consortia Training Equality and Diversity Policy or provide their own policy, which is deemed acceptable by Consortia Training.

### **Funded Centres**

Consortia Training funded organisations will choose whether to adopt this policy for Consortia Training learners within their organisation, with any necessary approved addendum added to personalise as required. Alternatively, they will produce their own Equality and Diversity policy, which Consortia Training will approve as suitable. Funded organisations are required to sign an acceptance and agreement to comply with this policy (within subcontractor's agreement).

### **Personnel Responsible for Consortia Funded Delivery**

All personnel responsible for Consortia Training funded delivery or support Consortia Training learners will receive a personnel induction, which covers equality & diversity and ensure they receive a copy of the Consortia Training Equality and Diversity Policy or subcontractor approved policy. They will receive a thorough training/briefing during induction to their post by the Director/Company Director or their representative(s). Further training needs will be assessed on a continued basis by each Consortia Training funded organisation via an annual appraisal, or sooner where a need is identified. Annual updates and training will be delivered.

All personnel responsible for Consortia Training funded delivery will be asked to register their understanding and agreement with this or the funded organisations' policy. Equality and Diversity will form an integral part of personnel meetings/communications and development work will be cascaded out to all Consortia Training funded personnel. Where appropriate additional training or development will be planned and provided.

### **Learners Funded by Consortia Training**

All learners invited to interview will be asked if any adjustments are required. A full Initial assessment will identify the needs of the individual. Any support needs identified will also be recorded and delivered, or referral identified, recorded and organised. Further guidance, support and monitoring will take place and be recorded at the learner review.

All learners will receive training and an induction written in a "user friendly" manner. It will cover equality and diversity, raising learner awareness. They will also be given access to the Equality and Diversity policy. They will be asked to sign a declaration to register their understanding and agreement with the ethos of the policy.

### **Employers**

Employers involved in the recruitment of Consortia Training funded learners, delivery of training or assessment, or supporting these processes, will receive a copy of the Consortia Training Equality and Diversity Policy and a thorough briefing. They will be asked to sign to register their understanding and agreement with this policy (within or to be included in an employer agreement).

## Procedure

When interviewing potential personnel responsible for Consortia Training funded delivery or forging new partnerships all reasonable adjustments possible will be made to accommodate the disabled. Consortia Training funded personnel will carry out all procedures without regard to race, age, gender, sexual orientation, religion or belief, transgender status, pregnancy, maternity, marital or partnership status.

Management will review the Equality and Diversity Policy annually. They will record the review and ensure an impact assessment is carried out. Management will also review other policies in line with their individual requirements, carry out, and record impact assessment outcomes.

## Marketing Materials and Widening Participation

Publicity and information materials will be developed to reflect an awareness of equality and diversity. Materials produced will reflect a diverse community, whilst consideration will be given to focus the materials at any particular underrepresented target group and the local community of operation. Each company director prior to final production should approve all marketing and learning materials in line with equality.

Promotional activities will be organised to promote training, where possible to under-represented groups, their parents and communities. These will focus on the schools in the local community and employers within the operational location. Other promotional targets will be considered and agreed in relation to widening participation. Barriers for under-represented groups will be considered and improvements actioned.

## Facilities

Where any new facilities are acquired or refurbishments are planned to premises for Consortia Training funded learners, consideration will be made for the access of disabled learners, personnel or customers. The learner access to toilets will be considered to provide access for disabled, male and female ratios. Disabled access to all site areas (or resources) for Consortia Training funded Training will be considered and actioned accordingly.

Suitable rooms are to be available to be used as Multi-faith Prayer Rooms; with access at times relevant to individual faith/belief/religion.

## Recruitment for Personnel Responsible for Consortia Training Funded Delivery

To ensure that no actual or potential personnel are discriminated against

**During the recruitment of personnel, Consortia Training funded organisations will:**

- **Be positive about the employment of people with a disability:**
  - a. Not asking any question about disability, sickness or absence from work on first contact by a person applying for full-time, part-time or volunteering work.
  - b. Interviewing all applicants with a disability who meet the minimum criteria for a job vacancy and consider them on their ability.
  - c. Make reasonable adjustment where the physical environment places an individual at a disadvantage in comparison to persons who are not disabled, including re-arranging of furniture, special

equipment or resources e.g. large print or audio. This includes making adjustments to enable people with disabilities to attend interviews without prejudicing their applications.

- d. Ask Consortia Training funded employees with a disability, at least once a year what Consortia Training could do to make sure they can develop and use their abilities at work.
- e. Make every effort when employees become disabled to retain them in employment e.g. move to another more suitable site or vacancy, time off for rehabilitation or flexible hours,
- f. Ensure all disabled Consortia Training funded employees receive the same work related benefits, training and promotion opportunities and will be treated equally in the normal dismissal or redundancy procedures.

## Learners

### Personnel Responsible for Consortia Training Funded Delivery will:

- Be positive about the training of people with a disability:
  - a. All promotional materials will include a disability statement.
  - b. Raise employer awareness relating to their legal obligations under the repealed Disability Discrimination Act extant codes of practice where appropriate and under the Equality Act 2010 – through news update and verbal reinforcement.
  - c. Interview (where appropriate) all applicants with a disability who meet the minimum criteria for the training programme and consider them on their ability.
  - d. Make reasonable adjustments where the physical environment places an individual at a disadvantage in comparison to persons who are not disabled. Record special access to facilities, services or resource arrangements within the learner's Individual learning Plan.
  - e. Ask learners with a disability, at least once a year, what Consortia Training could do to make sure they can develop and use their abilities to their full potential whilst training.
  - f. Make every effort when learners become disabled to make sure they stay in training.
- Continue to develop partnerships that promote access to under-represented groups, their communities, parents, teachers, community leaders and support workers.
- Where learner recruitment is mainly the responsibility of employers. Consortia Training funded organisations will monitor recruitment and the equality and diversity of the applicants, interviewees and the appointments. The quality team on an ongoing basis will review these checklists and the outcomes will be fed into the self-assessment process.
- Initial assessment results will identify the needs of the individual and these will be clearly recorded in the learners' Individual Learning Plan. Any support needs identified will also be recorded or referral identified, recorded and organised. Training programmes will be designed and delivered in a manner that reflects the diverse needs, aspirations, prior achievement, and prior experience of all learners.

- All learning, assessment materials or other resources will be written in plain English and will be free from cultural or other bias. Where possible they will reflect the communities of operation, be multi-cultural, non-sexist and contain a blend of positive images from the personal characteristics covered in the Equality Act 2010.
- All learners will receive dedicated training at least once a year for the delivery of issues around equality, diversity. These sessions will include issues related to disability, race, age, gender, sexual orientation, religion or belief, transgender status, pregnancy, maternity, marital status or background.
- The environment learners' access will be rich in equality and diversity messages and literature.
- The personnel will strongly promote to learners equality and diversity in teaching, learning and general day-to-day communications.
- The access to assessment will not be restricted in any way and all possible alternative assessment methods and procedures will be sought, within the constraints of the candidate, Consortia Training Funded organisations, the employer and in line with the Awarding Organisation guidelines.
- Arrangements will be made for learners with special assessment requirements to ensure no barriers prevent them from demonstrating their attainment.
- All procedures for assessment and testing will be free from cultural or other bias.
- Learners will be monitored concerning the implementation of this policy and their continued understanding of Equality and Diversity during the completion of learner review.
- Learners experiencing any problems with issues relating to equality will be dealt with sensitively. The completion of a confidentiality form will record discussion, but limit access to information, restricting to only people identified on the form. Consortia Training funded personnel requiring further information or support on dealing with issues can refer to management only with the learner's agreement.

### **Personnel Responsible for Consortia Training Funded Delivery**

#### **Consortia Training's commitment to equality & diversity will be demonstrated by.....**

- Advertising all available positions using positive action to promote to under-represented groups (where appropriate and agreed by company directors) internally or externally.
- Giving full consideration to and comply with the Equality and Diversity Policy to assist all personnel to reach their full potential.
- Ensuring all personnel responsible for Consortia Training funded delivery will be promoted and appointed solely based on their merits and abilities in relation to the job.
- Ensuring all personnel responsible for Consortia Training funded delivery will be aware they have the right to be treated with dignity and that sexual or racial harassment at work will not be permitted or condoned.

- Providing training and guidance on the implementation of this policy. Ensure personnel are fully aware of terms such as stereotyping, diversity, discrimination, harassment, bullying and victimisation.
- Promoting a harmonious working environment and atmosphere in which no employee feels under threat or intimidated because of his/her disability, race, age, gender, sexual orientation, religion or belief, transgender status, pregnancy, maternity, marital status or partnership or background.
- Providing (as part of the personnel induction procedures), all new employees to Consortia Training funded provision with training and guidance on Consortia Training's Equality and Diversity Policy and Practices, highlighting the importance of the policy and the seriousness of non-compliance.
- Encouraging any Consortia Training funded employee who believes that unfair treatment has been applied to him or her, within the scope of the policy, to raise the matter through the appropriate grievance procedure, without fear of subsequent victimisation. Therefore encouraging a positive culture for whistle blowing and safeguarding.
- Initiating disciplinary action if a Consortia Training funded personnel is found to be acting unlawfully, by breaching the equality & diversity legislation or Consortia Training Policy, or when a complaint about harassment or victimisation is proved founded.
- Issuing all Consortia Training funded personnel with notification and access to the new policy annually.
- Training and updating Consortia Training funded personnel annually on equality and diversity. To review the introduction of new legislation/update. Attendance at external courses on equality and diversity will be encouraged where possible and relevant.
- Ensuring Consortia Training funded personnel use linguistic equality and diversity positively and are aware of language and dialect spoken by their learners. They will promote non-biased language and challenge racist or sexist comments by others.

### **Sub-Contractors & Consortia Training Associated Employers**

Any of the above that recruit learners, deliver training or support Consortia Training in that process, will have a copy/access to the Consortia Training Policy and will agree to work in line with the ethos of the policy or produce their own policy, which will be checked by the Consortia Training for content, alongside Consortia Training's own policy.

Consortia Training will aim to focus employers' attention on underrepresented groups and their needs along with guiding employers on diverse recruitment practices and fair and appropriate procedures.

Consortia Training will track the recruitment of each learner to monitor the equality & diversity of Consortia Training funded learner recruitment by employers. From this process, statistics will be compiled to monitor the background and origins of all learner applicants.

Consortia Training funded personnel will monitor learners to oversee the implementation of this policy within the learners' working environment during their learner review.

Equality and Diversity will be continuously promoted using the all forms of communication, e.g. electronic, paper-based and face –to-face.

### **Requests for Information**

Requests for information will be responded to within two working weeks. Directors/Management will approve the release of information to ensure it does not contravene data protection legislation or could be used in any way that contradicts the Freedom of information Act.

### **Confidentiality and Data Protection**

Consortia Training is registered under data protection and will comply with all requirements for confidentiality of personal data in line with the legislation requirements.

### **Monitoring, Review and Evaluation**

#### **Monitoring of Process and Information**

The process of monitoring will build on the process of listen, consult and learn from actions and experiences of all involved and focus on improvement from the information obtained. The Consortia Training Directors and the Quality Team will monitor the Equality and Diversity Policy implementation.

#### **Learner Recruitment Monitoring**

In the case of learner recruitment, Consortia Training, led by the Quality Team will be involved in the monitoring process and will review the statistical outcomes(where permitted) from the recruitment processes and any issues raised from the learner review processes.

#### **Learner Participation, Success and Timely Success Monitoring**

Consortia Training funded learners' 'participation, success and timely success' will be monitored statistically in relation to the permitted range of protected characteristics. Data will be monitored and outcomes in relation to equality and diversity will be identified and actioned as necessary.

#### **Learner Feedback**

Questionnaires will also be used to monitor learner equality & diversity. This will be fed back to the Consortia Training Directors and included in the self-assessment process. Any necessary actions identified will be included in the subsequent Quality Improvement Plan.

Monitoring of equality & diversity is also covered in auditing of learner reviews, which will also monitor any issues of equality being raised during reviews.

#### **Impact Assessment**

This policy will be impact assessed for equality and diversity and records will be maintained.

#### **Safeguarding**

This policy will be reviewed to ensure it fully safeguards learners, personnel and other partners in relation to their levels of safety, health, achievement, enjoyment, contribution and wellbeing.

#### **Monitoring of Documentation and Policy**

The Quality Team will review the policy and documentation annually. Communications will notify Consortia Training funded organisations and associated employers of all reviews and any outcomes from the reviews. The updated policy will be submitted to the Consortia Training directors for approval/ratification. The completed policy will then be displayed in all subcontractor training rooms and distributed to each employer, and where appropriate available electronically on subcontractor VLE.

### Grievances/Complaints in Relation to Equality & Diversity

Consortia Training funded personnel, learners or associated employers have the right to lodge a complaint or grievance about any of the areas covered under the Equality and Diversity Policy. If discrimination is alleged the incident should be dealt with under the Grievances or Complaints.

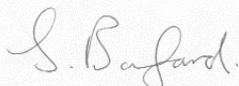
A Consortia Training funded learner or personnel who is not satisfied with the action taken by Consortia Training and feels it right to question the matter further, s/he may consider the following possible contact points:

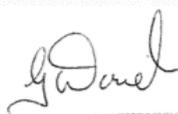
- ACAS
- Education and Skill Funding Agency
- Ofsted
- The Equality and Human Rights Commission
- The employee's Trade Union
- The Citizens Advice Bureau and/or law centre/firm
- Relevant professional bodies or regulatory organisations

All Consortia Training funded organisations will either adopt this policy with any necessary approved addendum added to personalise as required or alternatively, they will produce their own Equality and Diversity policy, which Consortia Training will approve as suitable.

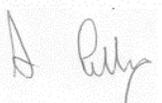
Consortia Training will monitor all of its funded organisations in line with this policy, therefore any individually produced policy will have to meet all of the above policy requirements as a minimum. A checklist has been produced for this purpose.

Approved by the Directors of Consortia Training on 20<sup>th</sup> September 2017

Signed:  S. Bamford

Signed:  G. Daniels

Signed:  G. Iannantuoni

Signed:  S. Lilley