

N-GAGED

Training

N-Gaged Training and Recruitment

Equality and Diversity Policy

May 2017

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Signed:



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Managing Director

N-GAGED Training Equality and Diversity Policy

Introduction

N-Gaged Training is committed to providing equality and diversity throughout its activities and this policy sets out its aims in this regard. This Policy provides details of:

- our overall **aims** in relation to Equality, Diversity and Community Cohesion;
- the underlying **principles** which guide our approach to Equality and Diversity issues;
- roles** and **responsibilities** for the Policy and its implementation;
- legal** duties and responsibilities.

We monitor our progress, continually review the actions we take and we proactively revise our approaches where required. We do this so that we can be sure that we are consistently progressing towards the achievement of our aims and principles for equality and diversity.

An overview of key legislation is shown in Appendix 1, and in particular we have a positive commitment to address our responsibilities and duties under *The Equality Act 2010*. In addition, we also realise that the legislation includes '*the public sector equality duty*' - this duty has a significant impact for us, (for example, via contracting with public authorities) and we will ensure that we adhere to any requirements in any areas of our work as a result of legislation.

N-Gaged Training is fully committed to the view that discrimination is unacceptable on any grounds, whether covered by the above legislation or not, and will positively seek to ensure that it does not occur.

This Policy does not exist solely as a response to legal requirements; N-Gaged Training sees Equality and Diversity as fundamental considerations underpinning all our activities. Therefore, this Policy applies to all members of the N-Gaged Training community (learners, staff, parents, visitors, employers, community members and any other individual or organisation working with us). N-Gaged Training is committed to promoting policies whereby no employee, learner or potential employee or learner is unfairly discriminated against.

AIMS

Our core aim is to provide education for all, acknowledging that the society within which we live is enriched by diversity.

We will strive to ensure that the culture and ethos of N-Gaged Training reflects and celebrates the diversity of ALL members of the organisation and wider community.

We will also seek to ensure that everyone is equally valued and treats one another with respect and fairness. Learners and other members of our organisation will be provided with the opportunity to experience, understand and celebrate diversity.

Our core values are:

- to encourage mutual respect for all
- recognise and work with every diverse group
- provide high quality inclusive services and facilities
- ensure our employment policies and practices are fair and;
- challenge harassment, victimisation and discrimination.

We will proactively seek to review and restructure the cultures, policies and practices in our organisation, so they can be welcoming and responsive to the full diversity of people locally, nationally and globally.

Principles

In working towards the realisation of our aims, we will be guided by the following principles:

i. All learners are valued equally

We see all learners and potential learners as of equal value regardless of disability/impairment, ethnicity, colour, creed, nationality, national origin or status, culture, religion or belief, gender, sexual orientation, gender identity, marriage or civil partnership or pregnancy and maternity status.

ii. Welcoming and celebrating diversity

Treating people equally does not necessarily mean treating them all *the same*. Our policies, procedures and activities must not discriminate, but are differentiated, as appropriate, to take account of differences of life-experience, outlook and background, and in the kinds of barriers and disadvantage which people may face, in relation to disability/impairment, medical needs, ethnicity, colour, creed, nationality, national origin or status, culture, religious affiliation, sex, sexual orientation, gender identity, marriage or civil partnership or pregnancy and maternity status.

iii. Fostering positive attitudes and relationships, and a shared sense of cohesion and belonging

We intend that our policies, procedures and activities should promote positive attitudes, an absence of harassment, positive interaction, good relations and dialogue between groups and communities different from each other, global citizenship, an absence of prejudice-related bullying and harassment and mutual respect.

iv. N-Gaged Training as an employer

Policies and procedures should benefit all employees and potential employees, for example in recruitment, promotion, and in continuing professional development.

v. Proactively reviewing what we do in order to reduce and remove inequalities and barriers

We proactively ensure that we make progress in regard to ensuring equality of opportunity for all, and we regularly review our actions. We will not simply seek to avoid discriminatory practices, we will take opportunities to maximise positive impacts by actively going about reducing and removing inequalities and barriers to equality and taking positive actions towards promoting and enhancing equality of opportunity for all.

vi. Creating Opportunity

We recognise the needs of every individual along with our commitment to enabling them to achieve their full potential. In doing this we recognise the need to raise aspirations for all.

vii. Consulting widely

People affected by a policy or activity should be consulted and involved in the design of new policies, and in the review of existing ones.

viii. Society as a whole should benefit

We intend that our policies and activities should benefit society as a whole, both locally and nationally, by fostering greater social cohesion, and greater participation.

ix. Safeguarding

Everyone in our organisation has responsibility for the welfare of young people, vulnerable adults, and indeed all learners and staff. We proactively ensure that arrangements are in place to safeguard and promote the welfare of children, young people and vulnerable adults. This includes protecting people from any forms of bullying, harassment or any other maltreatment based on equalities issues.

Objectives & Actions

This Policy has so far stated our overall aims and the underlying principles by which we will work. In order to deliver on these, we need to ensure that the way in which we *act* proactively contributes to their achievement. Therefore:

- i. We will keep all aspects of learning and indeed, all our activities, under review in order to ensure that they reflect our aims and principles.
- ii. We will use quantitative and qualitative data relating to the implementation of this policy, and take action as appropriate. In particular we collect, analyse and use data in relation to achievement and employment, broken down according to impairment and special educational needs, age, ethnicity and gender, as well as other equalities 'strands' where appropriate to do so.
- iii. Prejudice-related incidents will be identified as such when anyone involved with the incident feels that it is motivated by prejudice. All such incidents are referred to the **Operations Director or Quality Manager**, whose role it is to assess, record and deal with all incidents. We take seriously our commitment to report regularly to the Senior Management Team about the numbers, types and seriousness of any prejudice-related incidents at our organisation and how they were dealt with.
- iv. We respect the diversity of all staff, learners and parents/carers, and comply with reasonable requests relating to a full range of equalities issues.
- v. We ensure that the content of this policy is known to all staff and all learners and parents/carers, through induction process and training. All staff have access to a selection of resources, which discuss and explain concepts of equality, diversity and community cohesion in appropriate detail.
- vi. It is our policy that all staff receive training in Equality and Diversity principles, legislation and issues on an on-going basis. We will ensure that all staff are fully aware of their responsibilities towards the promotion of equality and diversity and take account of the different and differing needs of individuals/groups in all of their activities.
- vii. We will maintain records of the ethnic origin, sex and any disability of our learners and staff as a means of monitoring and identifying possible areas of inequality.
- viii. We will include Equality and Diversity on agendas for team meetings across N-Gaged Training & Recruitment, including at board level.
- ix. It is the individual responsibility of every member of staff to seek to ensure the practical application of this policy. In addition, special responsibility falls upon management and those involved in staff recruitment and training delivery to ensure its effectiveness.
- x. We ensure that the core principles listed above apply also to the full range of our policies and practices and our key mechanism for ensuring this is via our policy review process.

Rights of staff and learners

Recruitment, appraisal, job allocation and promotion will be conducted on a fair and lawful basis; assessment of merit must be based on clear work related criteria.

Access to a complaint's procedure which incorporate equality and diversity related issues. This will ensure that any complaints are taken seriously and investigated at senior management level.

Equality of access to training and other career development opportunities.

An environment free from discrimination, bullying or harassment.

An environment that is consistent with and adaptable to the needs of the individual.

To complain, without fear of victimisation, should an individual or group feel they have been subject to discrimination, victimisation, bullying or harassment.

Responsibilities of Staff & Learners

All members of N-Gaged Training should:-

Be aware of and critically examine their attitudes to people and groups to ensure that prejudices, stereotypes, presumptions and generalisations do not affect their judgement during selection, appraisal, career development or the delivery of the organisation's services.

Irrespective of their position within the organisation recognise that they are personally and individually responsible for ensuring that they act in accordance with the principles of Equality and Diversity as outlined in this Policy and its provisions. Failure to do so may result in disciplinary action.

Everybody involved with N-Gaged Training is expected to:

- promote an inclusive and collaborative ethos and learning and working environment.
- deal appropriately with any prejudice-related incidents that may occur.
- identify and challenge bias and stereotyping.
- support the diversity of learners based on individual need.

Everybody involved with N-Gaged Training must not:-

- Discriminate against colleagues, other employees, job applicants or learners.
- Bully or harass them or attempt to induce or attempt to induce other employees to practice unlawful discrimination.
- Victimise a colleague, learner or applicant.

Responsibilities of Management and Supervision

Managers and supervisors are responsible for promoting equality and diversity within their own commands and for ensuring that the business is conducted in accordance with our equality and diversity policies.

While in-service training programmes may be directed at specific staff groups or learners, particular attention will be paid to ensure that training courses and access to them are not discriminatory.

Those responsible for organising training will ensure regular monitoring of participants on all training courses, to determine whether any particular group is under-represented.

A regular process of reviewing the work of each staff member will be carried out by those staff having supervisory and management responsibilities. Training needs will be identified in conjunction with employees. It is the responsibility of those who are identifying training needs to look at suitable ways of meeting those needs.

Overall responsibility for the implementation and enforcement of our equality and diversity policy lies with the Managing Director.

Managers have a particular responsibility to oversee equality and diversity in employment practices, to provide advice and guidance and to develop good practice.

Monitoring will take place regularly to ensure that every section has taken action to implement and discuss the policy with their staff and learners.

We commit to ensuring that all staff and learners that we are responsible for do not suffer discrimination, harassment or bullying.

Staff and Learner Recruitment

Recruitment and selection procedures and practices throughout our organisation are regularly reviewed to ensure that no group is put at a disadvantage either directly or indirectly. To assist us in the process, a monitoring system will be maintained with regard to the ethnic origin, sex and disability of those applying, short listed for and appointed posts and training positions.

The company's aim is that the composition of the workforce should reflect that of the community. Where necessary, special steps as permitted by law will be taken to help disadvantaged and/or under-represented groups to compete for jobs on a genuine basis of equality.

All job descriptions will stipulate a commitment to the organisation's equality and diversity policy and specify any particular responsibilities for the post-holder in implementing it.

Every person appointed must be made aware, as part of the induction process, of the equality and diversity policy, and how it is applied.

To avoid racist, sexist or other discriminatory practices in staff recruitment, we will ensure:-

- That where possible those staff involved in interviewing and selection are given special training to avoid discrimination in these processes.
- That staff and learners are given an equal opportunity to progress within the organisation and, where appropriate, may be offered special training to ensure that they are able to achieve their full potential.

Grievance and Disciplinary Procedure

No staff or learner at N-Gaged Training should have to suffer discrimination, victimisation, bullying or harassment. All complaints of discrimination, victimisation, harassment or bullying etc. will be treated seriously and investigated with all possible speed, confidentially and sensitivity.

Such activities, if established against N-Gaged Training staff and learners, will be dealt with as misconduct.

Anyone believing that a complaint has not been properly acted upon is entitled to and should initiate **the Grievance Procedure**. The procedure explains in detail how to do this and staff and learners are entitled to receive copies of the Grievance Procedure.

GENERAL

This policy should not be read in isolation, but cross-referenced with all relevant N-Gaged Training employment and learner policies.

REVIEW

Policy Reviewed:	May 2017
Agreed:	May 2017
Next Review:	May 2018

APPENDIX 1

THE EQUALITY ACT 2010

The Equality Act 2010 has brought together and replaced the major pieces of Equal Opportunities legislation as well as bringing together around 100 other instruments within **a single Act**. It covers the same groups that were protected by previous equalities-based legislation and refers to these as “Protected Characteristics”.

The nine “Protected Characteristics” as set out in the Equality Act 2010 are:

1. Age
2. Disability
3. Gender Reassignment
4. Marriage and Civil Partnership
5. Pregnancy and Maternity
6. Race
7. Religion or Belief
8. Sex
9. Sexual Orientation

TYPES OF DISCRIMINATION

The Act defines the following different types of discrimination.

Direct Discrimination	This occurs when a person is treated less favourably because of a protected characteristic they have.
Indirect Discrimination	This occurs when a condition, rule, policy or practice that an organisation has in place disadvantages people who share a protected characteristic - even if the condition, rule, policy or practice is applied to everyone.
Discrimination arising from Disability	This occurs when a disabled person is treated unfavourably because of something connected with their disability and the unfavourable treatment cannot be justified.
Associative Discrimination	This occurs when a person is treated less favourably than another person because they associate with another person who possesses a protected characteristic.
Victimisation	This occurs when someone is treated badly because they have made or supported a complaint or raised a grievance under the Equality Act.
Perceptive Discrimination	This occurs when a person is treated less favourably than another person because others think they possesses a protected characteristic – even if the person does not actually possess that characteristic.
Harassment	This is unwanted conduct related to a 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.
Third Party Harassment	This is when an employee faces unwanted conduct related to a 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 by people who are not employees of the organisation.

PROTECTED CHARACTERISTICS – KEY POINTS

Age

The Equality Act protects people of all ages.

Different treatment because of age is not unlawful if it can be objectively justified i.e. it can be demonstrated that it is a **proportionate means of achieving a legitimate aim**.

Gender Reassignment

The Act provides protection for transsexual people.

A transsexual person is someone who proposes to, starts or has completed a process to change his or her gender.

The Act does not require a person to be under medical supervision to be protected – so a woman who decides to live permanently as a man but does not undergo any medical procedures would be covered.

Transgender people such as cross dressers, who are not transsexual because they do not intend to live permanently in the gender opposite to their birth sex, are not protected by the Act.

It is discrimination to treat transsexual people less favourably for being absent from work because they propose to undergo, are undergoing or have undergone gender reassignment than they would be treated if they were absent because they were ill or injured. Medical procedures for gender reassignment such as hormone treatment should not be treated as a 'lifestyle' choice.

Sex

Both men and women are protected under the Act.

Marriage and Civil Partnership

The Act protects people who are married or in a civil partnership.

Single people are not protected.

Sexual Orientation

The Act protects bisexual, gay, heterosexual and lesbian people

Disability

The Equality Act protects anyone who has, or has had, a disability, for example, if a person has had a mental health condition in the past that met the Act's definition of disability and is harassed because of this, it would be unlawful.

The Act defines disability as a physical or mental impairment which has a substantial and long-term adverse effect on his/her ability to carry out normal day-to-day activities.

'Substantial' means more than minor or trivial.

'Impairment' covers, for example, long-term medical conditions such as asthma and diabetes, and fluctuating or progressive conditions such as rheumatoid arthritis or motor neurone disease. A mental impairment includes mental health conditions such as bipolar disorder or depression, learning difficulties such as dyslexia and learning disabilities such as autism and Down's syndrome. Some people, including those with cancer, multiple sclerosis and HIV/AIDS, are automatically protected by the Act. People with severe disfigurement will be protected without needing to show that it has a substantial adverse effect on day-to-day activities.

Discrimination is not unlawful if a service provider can show that it did not know, or could not reasonably be expected to know that the person was disabled. This means that employers and service providers need to take reasonable steps to find out whether someone is disabled, though care needs to be taken to ensure that any enquiries do not infringe the disabled person's privacy or dignity.

There is a legal requirement to make reasonable changes to the way things are done; this could include changing a policy, making changes to the built environment, such as making changes to the structure of a building to improve access, and providing auxiliary aids and services, such as providing information in an accessible format, an induction loop for customers with hearing aids, special computer software or providing additional support for employees or customers using a service.

Where a service is delivered from a building that cannot be made accessible through reasonable adjustments, it may be a reasonable adjustment to provide the service at a different venue, which, as an example, could include a home visit.

Reasonable changes are required wherever disabled employees, potential employees or potential customers would otherwise be at a substantial disadvantage compared with non-disabled people. A substantial disadvantage is more than a minor or trivial disadvantage. Service providers and employers cannot charge disabled customers for reasonable adjustments. What is reasonable will depend on all the circumstances, including the cost of an adjustment, the potential benefit it might bring to others (for example, ramps and automatic doors benefit people with small children or heavy luggage), the resources an organisation has and how practical the changes are.

The Equality Act 2010 requires that service providers must think ahead and take steps to address barriers that impede disabled people. It is not acceptable to wait until a disabled person experiences difficulties using a service, as this may make it too late to make the necessary adjustment (this is an anticipatory and continuing duty owed to disabled people generally, regardless of whether it is known that a particular person is disabled or whether there are currently any disabled service-users).

Pregnancy and Maternity

A woman is protected against discrimination on the grounds of pregnancy and maternity during the period of her pregnancy and any statutory maternity leave to which she is entitled. During this period, pregnancy and maternity discrimination cannot be treated as sex discrimination.

It is unlawful to take into account an employee's period of absence due to pregnancy-related illness when making a decision about her employment.

It is unlawful to discriminate against a woman because she is breastfeeding. Women to whom an organisation is providing goods, facilities and services should be able to breastfeed should they so wish.

Race

'Race' includes colour, nationality, and ethnic or national origins. A racial group can be made up of two or more different racial groups, for example, Black Britons.

'Ethnicity' is where a group has a long shared history and cultural tradition, come from a common geographical area, descend from a small number of ancestors, have a common language or literature and a common religion.

Religion or Belief

Religion includes any religion. It also includes a lack of religion, in other words people are protected if they do not follow a certain religion or have no religion at all.

A religion must have a clear structure and belief system.

Belief means any religious or philosophical belief or a lack of such belief. To be protected, a belief must satisfy various criteria, including that it is a weighty and substantial aspect of human life and behaviour.

Denominations or sects within a religion can be considered a protected religion or religious belief.

Humanism is a protected philosophical belief.

Political beliefs would not be protected.

Discrimination because of religion or belief can occur even where both the discriminator and recipient are of the same religion or belief.

OTHER POINTS TO BE AWARE OF

Equal Pay

In most circumstances a challenge to pay inequality and other contractual terms and conditions had to be made by comparison with a real person of the opposite sex in the same employment. However, the Equality Act allows a claim of direct pay discrimination to 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 the Protected Characteristic of "Sex".

Positive Action

For all groups of people with characteristics protected under the Equality Act to benefit equally from employment and services provided by organisations, some groups may need more help or encouragement than others. This is because some groups are disadvantaged or under-represented, or have different needs from the population as a whole due to past or present discrimination or exclusion or particular experiences.

The Equality Act allows employers and service providers to take action that may involve treating one group more favourably where this is a **proportionate way** to help members of that group overcome a disadvantage or participate more fully, or in order to meet needs they have that are different from the population as a whole. This is called 'positive action'.

Positive action can be taken when three conditions are met:

1. The organisation must reasonably think that a group of people who share a protected characteristic:
 - suffer a disadvantage linked to that characteristic;
 - have a disproportionately low level of participation in this type of employment, service or activity, or;
 - need different things from this employment or service from other groups.'Reasonably think' means that the disadvantage, low level of participation or different needs can be seen (detailed statistical or other evidence of this does not need to be shown).
2. The action taken is intended to:
 - meet the group's different needs;
 - enable or encourage the group to overcome or minimise that disadvantage, or;
 - enable or encourage the group to participate in that activity.
3. The action taken is a **proportionate way** to increase participation, meet different needs or overcome disadvantage. This means that the action is appropriate to that aim and that other action would be less effective in achieving this aim or likely to cause greater disadvantage to other groups.

Positive action is always voluntary – not compulsory.

Pay Secrecy

The Act makes it unlawful for an employer to prevent or restrict employees from having a discussion to establish if differences in pay exist that are 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.

Pre-employment health-related checks

The Equality Act limits the circumstances when employers can ask health-related questions before offering an individual a job. Up to this point, employers can only ask health-related questions to help them to:

- decide whether any reasonable adjustments need to be made for the person to the selection process,
- decide whether an applicant can carry out a function that is essential ('intrinsic') to the job,
- monitor diversity among people making applications for jobs,
- take positive action to assist disabled people,
- ensure that a candidate has the disability where the job genuinely requires the jobholder to have a disability.

A jobseeker cannot take an employer to an Employment Tribunal if they think the employer is acting unlawfully by asking questions that are prohibited, though they can complain to the Equality and Human Rights Commission.

Once a person has passed the interview and have been offered a job (whether this is an unconditional or conditional job offer) the employer is permitted to ask appropriate health-related questions.

Occupational requirements

If an employer can show that a particular Protected Characteristic is central to a particular job, they can insist that only someone who has that particular protected characteristic is suitable for the job. This would be an 'occupational requirement'. For example, a women's refuge may want to say that it should be able to employ only women as counsellors; its client base is only women who are experiencing domestic violence committed by men - this would probably be a genuine occupational requirement.

Obeying another law

An employer can take into account a Protected Characteristic where not doing this would mean they broke another law. For example, a driving school must reject a 19 year old who applies for a job as a driving instructor because to offer them a job – even if they are the best candidate – would involve breaking the law because a driving instructor must be aged at least 21.

Exceptions

There are exceptions that only apply to some employers:

A religion or belief organisation, may be able to say that a job requires a person doing the job to hold a particular religion or belief if, having regard to the nature or context of the job, this is an occupational requirement and it is objectively justified. For example, a Humanist organisation which promotes Humanist philosophy and principles would probably be able to apply an occupational requirement for its chief executive to be a Humanist.

An organised religion (or, when not an organised religion but a job is for the purposes of an organised religion) may be able to say that a job or role requires a person to have or not have a particular Protected Characteristic or to behave or not behave in a particular way. If:

- a job or role exists for the purposes of an organised religion, such as being a Minister or otherwise promoting or representing the religion, and
- because of the nature or context of the employment, it is necessary to avoid conflict with the strongly held religious convictions of a significant number of the religion's followers or to conform to the doctrines of the religion by applying a requirement to the job or role.

Employment may be refused to a person because:

- they are male or female,
- they are a transsexual person,
- they are married or in a civil partnership, including taking into account who they are married to or in a civil partnership with (such as someone who marries a divorced person whose former spouse is still alive),
- they manifest a particular sexual orientation, for example, a gay or lesbian or bisexual person who is in a relationship with a same-sex partner.

The requirement must be crucial to the job or role, and not merely one of several important factors. The job or role must be closely related to the purposes of the religion, and the application of the requirement must be proportionate.

- An employment service provider may be able to say that a person must have a particular Protected Characteristic to do vocational training, if the training leads to work for which having that characteristic is an occupational requirement.
- An educational establishment like a school or college, may be able to say that someone has to be of a particular religion or belief, or must be a woman.
- Recruiting to the civil, diplomatic, armed or security and intelligence services and some other public bodies, can specify what nationality a person has to be.
- Recruiting for service in the armed forces, may be able to exclude women and transsexual people if this is a proportionate way to ensure the combat effectiveness of the armed forces. In addition, age and disability are, in effect, not Protected Characteristics in relation to service in the armed forces. Disability can also be a reason to refuse someone work experience in the armed forces.

THE PUBLIC SECTOR EQUALITY DUTY

The Equality Act 2010 has replaced the three previous separate Duties (covering Race, Disability and Gender) with a single Public Sector Equality Duty. This single Equality Duty encompasses the following 9 protected characteristics:-

1. Age
2. Disability
3. Gender Reassignment
4. Marriage and Civil Partnership
5. Pregnancy and Maternity
6. Race
7. Religion or Belief
8. Sex
9. Sexual Orientation

The Public Sector Equality Duty states that a public authority must, in the exercise of its functions, have due regard to the need to:-

- 1. Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by the Equality Act 2010;**
- 2. Advance equality of opportunity between persons who share a protected characteristic and persons who do not share it;** this means:-
 - removing or minimising disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic.
 - taking steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it.
 - encouraging persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.
- 3. Foster good relations between persons who share a protected characteristic and persons who do not share it;** this means:-
 - tackling prejudice.
 - promoting understanding.

Implementation Plan

What	How	By When	By Whom	Evidence
Staff Training	Induction – all new staff to receive induction pack including policy statements and discussion with line manager	At Induction	By Line Managers	Signed Checklist
	Equality and Diversity Training	When required		Certificate
	Equality discussed as part of appraisal and actions recorded	Appraisal June/July 17 then yearly		Appraisal Records
Performance	Underrepresentation noted, and actions to consider individuals with specific protected characteristics by increase in recruitment activities for next cohort	When recruiting	Management team	HR Files
Communication	Positive imagery used in promotions – leaflets and posters	Ongoing on all promotional material	Management team	Copies
Delivery	Code of behaviour discussed complaints procedures, what equality means, etc.	Learner Induction Throughout Courses IAG	All delivery staff	Learner records Lesson plans
	Importance of equality, relevance to employment, education and training			