



Elysium Training

Equality, Diversity and Inclusion Policy

Statement of Intent

Our aim at Elysium Training is to develop, maintain and support a culture of equality, diversity and inclusion in employment in which staff are treated equitably, and where they can realise their potential whatever their age, race, colour, nationality, ethnic origin, creed, disability, sexual orientation, sex, gender identity, marital or civil partnership status, parental status, religion, belief or non-belief, social or economic class, employment status, or any other criteria that cannot be shown to be properly justifiable. Elysium Training ensure that, throughout their employment, all employees of the company are treated fairly and with dignity and respect. This policy interfaces with all relevant Recruitment Procedures with respect to job applicants, and Elysium Training will make best endeavours to ensure that policies, procedures and practices always comply with current legislative requirements.

It is also the aim of Elysium Training and this policy to ensure that, throughout their journey with us, all apprentices and employers are treated fairly and with dignity and respect and are provided with an equality of opportunity to achieve. Elysium Training is committed to developing, maintaining and supporting a culture of equality, diversity and inclusion in service and learning provision in which apprentices feel free from harassment and bullying of any description, or any other form of unwanted behaviour, and are also treated equitably and can realise their potential.

Equality of opportunity and inclusivity is fundamental to the vision and values of Elysium Training. The principles of equality, diversity and inclusion are at the very heart of every operational aspect from recruitment and selection through to teaching and learning, and are supported by appropriate policies, procedures and good practice. Elysium Training will not tolerate any form of discrimination, bullying, harassment or victimisation and aims to promote a culture in which apprentices, employers and staff feel supported and encouraged to challenge discriminatory and/or unacceptable behaviour at all levels.

Equality is not about treating everyone the same, it is about ensuring that access to opportunities are available to all by taking account of differing needs and capabilities. Diversity is about recognising and valuing differences through inclusion, regardless of age, disability, gender, racial origin, religion, belief, sexual orientation, perspectives, opinions and personal values.

Scope

This policy applies to all Elysium Training, offices, operations, activities and services, without exception, and to all Elysium Training employees at all levels of the organisational structure. The Aims of this policy will equally apply to all Elysium Training operations and activities conducted on sites beyond Elysium Training control wherever its employees are designated to perform their contractual duties.

Definitions

The Equality Act 2010 makes it unlawful for employers to discriminate on the grounds of race, religion or belief, disability, gender or gender reassignment, age, sexual orientation, marriage or civil partnership, pregnancy or maternity; all of which are referred to as individuals or groups with 'protected characteristics'. Elysium Training and this policy aims to protect all employees and all individuals who use Elysium Training services, such as apprentices, in relation to the following aspects.

1.3 Discrimination: The Equality Act (2010) expands upon previous definitions of Discrimination and circumstances in which this may arise as follows:

- a) **Direct discrimination:** Direct discrimination occurs when someone is treated less favourably than another person because of a protected characteristic they have or are thought to have (see perception discrimination below), or because they associate with someone who has a protected characteristic (see discrimination by association below).

- b) **Discrimination by association:** This is direct discrimination against someone because they associate with another person who possesses a protected characteristic.
- c) **Perception discrimination:** This is direct discrimination against an individual because others think they possess a protected characteristic. It applies even if the person does not actually possess that characteristic.
- d) **Indirect discrimination:** Indirect discrimination can occur when a condition, rule, policy or practice is applied equally to all staff or apprentices, but particularly disadvantages people who share a protected characteristic

Harassment: The Equality Act (2010) defines harassment as *“unwanted conduct related to a relevant 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”*. It expands upon previous definitions of harassment and circumstances in which this may arise as follows:

- a) **‘Harassment’.** The expanded definition above enables staff or apprentices to complain of behaviour that they find offensive even if it is not directed at them, and the complainant need not possess the relevant characteristic themselves.
- b) **‘Third Party Harassment’.** The Equality Act makes Elysium Training potentially liable for harassment of its staff or apprentices by people (third parties) who are not other employees, such as apprentices, contractors, visitors, etc. This could arise when harassment has occurred and Elysium Training has been made fully aware of this on previous occasions, but reasonable steps have not been taken to prevent it from happening again.
- c) **‘Victimisation’.** Victimisation occurs when an employee or apprentice is treated unfairly or unreasonably because they have made or supported a complaint or raised a grievance under the Equality Act; or because they are suspected of doing so. An employee or apprentice is not protected from victimisation if they have maliciously made or supported an untrue complaint.

Age: The Act protects people of all ages. However, different treatment because of age is not unlawful direct or indirect discrimination if it can be justified i.e., if it can be demonstrated that it is a proportionate means of meeting a legitimate aim. Age is the only protected characteristic that allows employers to justify direct discrimination.

Disability: The Act has made it easier for a person to show that they are disabled and protected from disability discrimination. Under the Act, a person is disabled if they have a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities, which would include things like using a telephone, reading a book or using public transport.

As before, the Act puts a duty on an employer to make reasonable adjustments for staff to help them overcome disadvantage resulting from an impairment (e.g., by providing assistive technologies to help visually impaired staff use computers effectively). The Act includes a new protection from discrimination arising from disability. This states that it is discrimination to treat a disabled person unfavourably because of something connected with their disability (e.g., a tendency to make spelling mistakes arising from dyslexia). This type of discrimination is unlawful where the employer or other person acting for the employer knows, or could reasonably be expected to know, that the person has a disability. This type of discrimination is only justifiable if an employer can show that it is a proportionate means of achieving a legitimate aim. Additionally, indirect discrimination now covers disabled people. This means that a job applicant or employee could claim that a rule or requirement that an employer has in place disadvantages people with the same disability. Unless this could be justified, it would be unlawful. The Act also includes a new provision which makes it unlawful, except in certain circumstances, for employers to ask about a candidate’s health before offering them work.

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 no longer requires a person to be under medical supervision to be protected – so a woman who decides to live as a man but does not undergo any medical procedures would be covered. 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.

Marriage and Civil Partnership: The Act protects individuals who are married or in a civil partnership against discrimination. Single people are not protected by this act.

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. An employer must not consider an employee's period of absence due to pregnancy-related illness when making a decision about her employment.

Race: For the purposes of the Act 'race' includes colour, nationality and ethnic or national origins.

Religion and Belief: In the Equality Act, religion includes any religion. It also includes a lack of religion, in other words employees or jobseekers are protected if they do not follow a certain religion or have no religion at all. Additionally, 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. Discrimination because of religion or belief can occur even where both the discriminator and recipient are of the same religion or belief.

Gender and Sexual orientation: The Act protects all people regardless of how they identify.

Complaints

All complaints of discrimination will be treated seriously and dealt with promptly, efficiently and where possible in confidence. The aim of the procedure is to resolve complaints of discrimination. Any employee or apprentices may use this procedure if they believe they have:

- Been treated unfavourably in contravention of the equal opportunities policy on the grounds of any protected characteristic.

Any employee or apprentices who believes they have been the victim of discriminatory treatment, or who has witnessed discrimination or harassment, may choose to take informal or formal action.

Informal action: Where possible the employee or apprentices should talk directly and informally to the person; they believe has discriminated against them and explain their objection to their actions or conduct. It may be that the person whose conduct is causing offence is genuinely unaware that their behaviour is unwelcome or objectionable.

If the apprentice feels unable to approach the person or if they have already done so without any resolution, they may elect to raise a formal complaint with the Managing Director.

Alternatively, the complaint can be raised informally with the line manager who will try to assist the employee or apprentices to find an appropriate solution to the problem and give sign posting to pastoral care.

Formal action: The employee or apprentices may raise the complaint in writing for the attention of the Managing Director. The complainant must identify the person who is alleged to have perpetrated discriminatory treatment and

give specific examples of actions or conduct that the apprentice believes constitutes discrimination. In the event of serious allegations, it may be necessary to consider whether to suspend the alleged perpetrator to prevent any further contact between parties until the matter could be fully dealt with.

An investigation will be conducted and will be handled with due respect to the rights of the complainant and alleged perpetrator. Both parties will be interviewed separately where they will be provided with the opportunity to state their side of events and explain any conduct that forms the basis of the employee's or apprentices complaint against them.

If following the investigation, the complaint is founded, prompt action will be taken to remedy the discrimination and prevent any recurrence.

The organisation regards all forms of discrimination as gross misconduct (except unintentional behaviour of a mild nature) and any employee or apprentices found guilty of this behaviour will be liable to disciplinary action up to and including summary dismissal. Disciplinary action will also be taken against any apprentice or employee who is found to have made a deliberately false or malicious complaint of discrimination.

Responsibilities

Overall responsibility for implementation and overseeing this Policy rests with the Elysium Managers. The Managing Director is responsible for ensuring that Elysium Training complies with equalities legislation and promotes equality of opportunity and diversity throughout the organisation.

Managers are responsible for developing an open and inclusive culture in which apprentices, employers and staff feel able and encouraged to report any incidents of discrimination, harassment and bullying in the workplace. Managers are expected to actively support apprentices, employers and staff making a complaint and ensure that any such allegations are fully and thoroughly investigated and dealt with appropriately.

Managers will be responsible for ensuring that awareness is raised with third parties that harassment will not be tolerated, and that complaints of discrimination and harassment will be investigated, and action taken against offenders found guilty of such as appropriate to protect apprentices, employers and staff from further occurrences.

Managers will also be responsible for setting high standards for equality and diversity in all Elysium Training centres and workplaces, and for ensuring that all staff and apprentices are aware of the requirements of this policy and that it is applied fairly, rigorously and consistently.

Every member of staff carries personal responsibility for their own behaviour at work and for ensuring that this policy is translated into practice in all areas of employment and service provision.

All staff have a duty to report any incidents of discrimination, harassment or bullying that come to their attention, and to take part in any investigation into such allegations, to support Elysium Training in the development of a culture in which staff and apprentices feel able and supported to report such concerns and have them fairly and robustly addressed. Elysium Training gives an assurance that there will be no victimisation against an employee or apprentice making a genuine complaint in good faith or against employees or apprentices who assist or support colleagues or peers in making such a complaint.

The contents of this policy will be communicated to all employees during induction and thereafter at each subsequent policy review. Absolute compliance with this Equality, Diversity and Inclusion Policy is a condition of employment.

This policy is available, and will be communicated, to all interested parties, is agreed by the Managers/Directors and will be reviewed at least annually.

Introduction

The Equality, Diversity & Inclusion action plan has been developed through discussions with key staff. Equality, Diversity and Inclusion, is an agenda item on all meeting agendas. It will be updated and reviewed annually.

Objective	Actions	Responsibility	Reviewed	Impact
All imagery should reflect and celebrate the diversity of the local/national community.	Continue to ensure all imagery in publications, displays, materials, website and internal comms will reflect and celebrate the diversity of local/national community	Managing Director Managers	<ul style="list-style-type: none"> – Monthly Quality Meetings – Quarterly at staff and learner reviews – Quarterly at Board Meetings 	All staff, learners, employers and local/national communities visually see that Elysium Training is inclusive of all backgrounds. Elysium Training has attracted learners from all ethnicity and diversity backgrounds.
Monitor gender profiles	Continue to monitor gender profiles at qualification level and promote provision through imagery and course literature that challenges gender stereotypes e.g., Male carers	Managing Director Managers	<ul style="list-style-type: none"> – Quarterly at Board Meetings 	Higher number of males taking part and successfully completing courses, that are currently female dominated and vice-versa.
Analyse ethnic minority group learner success rate trends.	Continue to undertake a qualification level analysis to evaluate success rate trends for ethnic group learners to identify actions required to ensure any discernible gap analysis is addressed.	Managing Director Managers	<ul style="list-style-type: none"> – Quarterly at Board Meetings – Monthly Quality Meetings – Quarterly at staff and learner reviews – Bi-Monthly Standardisation Meeting 	Learners achieve in relation to their peers regardless of background of learners and staff.

Objective	Actions	Responsibility	Reviewed	Impact
Learners in receipt of Additional Learning Support to be discussed monthly to establish outcomes.	Establish a monthly discussion with delivery staff for the outcomes of learners in receipt of any additional support that integrates with qualification progress tracking to enable targeted interventions of for at risk learners.	Managing Director Managers	<ul style="list-style-type: none"> – Monthly Quality Meetings – Monthly Caseload Reviews 	Learners that receive additional support successfully achieve and progress well and complete their programme with positive outcomes.
Ensure Elysium Training as an employer is disability friendly.	<p>Ensure that Elysium Training supports staff to access work related opportunities (within reasonable adjustment)</p> <p>Ensure Elysium Training has buildings that are accessible (within reasonable adjustment)</p>	Managing Director Managers	<ul style="list-style-type: none"> – Quarterly at Board Meetings 	<p>Ensures that the best candidates are employed regardless of disability</p> <p>Promotion of disability awareness amongst staff and learners that breaks down stereotypes.</p> <p>Anyone with a disability will be able to access Elysium Training's premises (within reasonable adjustment)</p>

Objective	Actions	Responsibility	Reviewed	Impact
Ensure that all learners and staff promote British values	Embed into induction for all new learners and staff	Managing Director	<ul style="list-style-type: none"> – Quarterly at Board Meetings – Monthly Quality Meetings – Quarterly at staff and learner reviews – Bi-Monthly Standardisation Meeting 	<p>All staff and learners will understand British values, which will be contextualised to the real world and relatable to them personally.</p> <p>Learners will know where the relevant information is and how it impacts on them as learners.</p> <p>Improved tutor/coach embedding of British Values</p>
Democracy.	Staff to embed where appropriate into the strands of the learner journey.	Managers		
The rule of law.		Staff		
Individual liberty.	Staff to undergo training in relation to British Values and Equality, Diversity and Inclusion.			
Mutual respect for and tolerance of those with different faiths and beliefs and for those without faith.	Staff will support learners to develop an understand of British Values.			
	Embedding – part of wider Prevent Agenda into curriculum (where it fits naturally)			