



## Equality and Diversity Policy

Always Consult Ltd is an Equal Opportunity Employer. As such it wishes to secure genuine equality of opportunity whether required by legislation or not, in all aspects of recruitment, employment, training, service delivery and relationships between business partners, clients, apprentices, learners, Associates and others. Selection for employment, promotion, training, or any other benefit will be based on aptitude and ability. All will be helped and encouraged to develop their full potential and will be fully utilised to maximise the efficiency of the organisation.

### Purpose

The purpose of this policy is to provide equal opportunities to all, and value the diversity of everyone. To this end, Always Consult Ltd will take every reasonable and practicable step to ensure that there is no unwarranted discrimination against employees, Associates, apprentices or learners on account of their gender, race, ethnic origin, disability, age, nationality, national origin, sexual orientation, religion, belief, marital status, criminal record social class or any other individual characteristic. Always Consult opposes all forms of unlawful and unfair discrimination.

Always Consult Ltd recognises that primary responsibility at law rests with the employer to ensure that there is no unlawful discrimination. Promoting equality of opportunity should be understood, supported and implemented by all employees, apprentices, learners and Associates.

This policy will help to embed in our company a culture that values openness, fairness and transparency.

### Objectives

This policy aims to ensure that:

1. The company has access to the widest labour market and is able to secure the best employees, apprentices, learners and Associates for its needs.
2. No applicant, apprentice, learner, Associate, or employee receives less favourable treatment; and, wherever possible, they are given the help they need to attain their full potential to the benefit of the company, themselves and their employer where appropriate.
3. No candidate for training receives less favourable treatment during selection.



4. The company can achieve an ability-based workforce, which is in line with the working population mix in the relevant labour market areas.

## Responsibilities

The Senior Leadership Team (SLT) is responsible for overseeing implementation of the Equality and Diversity Policy and amending it as required and securing compliance with the Policy.

The SLT is responsible for:

- Monitoring relevant legislation and publicising new information to staff, apprentices, learners, Associates and others
- Ensuring that staff, apprentices, learner and Associates are trained in the application of equal opportunities and diversity law and policies.
- Preparing and delivering relevant training to staff and others.
- Reporting on Equal Opportunities Legislation and training at SLT Meetings.
- Distributing the Equal Opportunities Policy to any employers, apprentices, learners and Associates who request it.
- Collecting and collating data on referrals in respect of Equal Opportunities issues (gender, disability, ethnic origin) and providing a summary to the management meeting.
- Attending relevant external courses and seminars in support of this role.

All staff, apprentices, learners and Associates are responsible for ensuring that this Policy is embedded in their duties and functions. This includes attending relevant training courses and ensuring that the operation of their duties conforms to and promotes the Policy. All staff, apprentices, learners and Associates will champion Equal Opportunities as a matter of course. Staff involved with apprentices or learners will additionally verify their candidates' awareness of Equal Opportunities, discuss instances of possible discrimination with candidates, and if necessary, take appropriate action to help remedy the problem.

## Legal obligations

Always Consult Ltd recognises that it has a broader duty that is required by legislation, and the company's Equality and Diversity Policy is not limited to the demands of relevant legislation. Everyone is entitled to a working environment that

promotes dignity and respect for all. No form of intimidation, bullying or harassment will be tolerated. The policy will be implemented within the framework of the relevant legislation which includes: -

- Equal Pay Act 1970 (Equal Value Amendment 1984)
- Rehabilitation of Offenders Act 1974
- Sex Discrimination Act 1975 (Gender Reassignment Regulations 1999; Indirect Discrimination & Burden of Proof Regulations 2001; Employment Equality (Sex Discrimination) Regulations)
- Race Relations Act 1976 (Race Relations Amendment Act 2000)
- Disability Discrimination Act 1995
- SENDA 2001
- The Protection from Harassment Act 1997
- Human Rights Act 1998
- Employment Act 2002
- Employment Equality (Sexual Orientation) Regulations 2003
- Employment Equality (Religion or Belief) Regulations 2003
- Employment Equality (Age) Regulations Act 2006
- Equality Act 2010
- Equality Act (Sexual Orientation Regulations) 2007
- Civil Partnership Act 2004
- Gender recognition Act 2004
- Disability Act 2005
- Equality Bill 2010
- GDPR 2018

## Implementation

It is essential that all apprentices, learners and employees play their part in implementing this policy. To this end **we** will ensure that:

- All employees, apprentices, learners, contractors, customers, and Associates/Partners have read and understood the policy and related policies such as Health & Safety and Safeguarding.
- Development training and related activities are provided on a regular basis.
- Employment and assessment procedures are non-discriminatory and are designed to meet the needs of a diversity of candidates.

- Documentation and electronic communication are readily understood and accessible and does not re-enforce stereotypical or biased attitudes in style or language.
- Advertising and marketing meet statutory requirements regarding accessibility as well as promoting and reflecting diversity.
- Examiners, Assessors and Verifiers apply fair and unbiased processes.
- Equal opportunities and diversity are addressed as an ongoing and integral part of the business.
- Action is taken when noncompliance with the policy is identified.

## **Commitment**

### **Staff Recruitment**

We will ensure that the selection criteria used is clear, relevant, and objective. There will be no requirements or criteria that are unnecessary, and which may exclude applicants from any particular section of the population.

We will:

- Use a job description and person specification as part of our recruitment process to help us focus on what the job involves and the skills, experience and qualifications needed to do the job well.
- Avoid unnecessary tasks or overstated responsibilities or jargon, acronyms, and abbreviations, which may exclude people who do not understand what they mean, unless understanding certain technical terms is a necessary part of the job.
- If a disabled person applies for the job, make reasonable adjustments to remove barriers that non-disabled people would not face in being able to do the job.
- Select applicants for interview solely based on their qualifications, skills and experience and assess everyone according to his/her personal capability to carry out a given job.
- Establish in advance a clear criterion for short listing which will be applied equally to all applicants.
- Avoid making assumptions about an individual's ability to do the job based on the protected characteristics of age, disability, gender reassignment, marriage

and civil partnerships, race, religion or belief, pregnancy or maternity, sex, or sexual orientation.

- Interview all disabled applicants that meet the minimum requirements of the job in line with our commitment.
- Ask relevant interview questions based on the applicant's competence to carry out the requirements of the role. Pre-employment health questions will not be used until an applicant has been either offered the job or included in a pool of successful candidates to be offered a job when a position becomes available (for example, if we are opening a new workplace or expect to have multiple vacancies for the same role but do not want to recruit separately for each one). However, all applicants will be asked if they need any adjustments for the interview process.
- Ensure, where selection tests are used, they correspond to the requirements of the job and are applied equally to all applicants. If requested, reasonable adjustments will be made to selection tests for applicants with disabilities.
- Ensure that any applicant who makes a complaint of discrimination is asked to explain how they believe they were discriminated against. Any complaints of discrimination will be escalated to the SLT to ensure that notes are made of all conversations and kept on file.
- Ensure all discrimination claims are tracked and monitored by the SLT.

### **Training and development**

We will:

- Treat all apprentices, learners and staff equally in the provision of training and development opportunities and selection will be against clearly defined criteria. Related decisions will be based on merit and the benefit to both the Company and the apprentice/learner, not due to the individual's personal circumstances.
- Not deny training because they have commitments outside of work that make it difficult for them to take advantage of those opportunities. Therefore, when assessing who can attend a training/development course, those who work part-time will be treated the same as full time.
- Offer an explanation to staff and apprentices/learners who are not granted a training or development opportunity. Any related decisions that have been

taken on a discriminatory basis will not be tolerated and could lead to disciplinary action being taken against the manager concerned.

- Use one to one meetings or staff appraisals to consider the skills and knowledge of our staff to determine training needs analysis for the individual in line with their role.
- Advertise training and other development opportunities as widely as possible throughout the company by using the company intranet sites and cascaded through staff meetings.
- Encourage staff to apply for relevant training and other development opportunities, including those on maternity/paternity leave (providing the training does not occur during the leave or can be fitted into any agreed keeping in touch days), so that no one is overlooked.
- Monitor the take up of training and other development opportunities to ensure procedures operate consistently.
- Investigate any significant differences in take-up between different groups and follow up with appropriate action.
- Enable as wide a range of people as possible, to participate in training by offering training in different styles, at different times, and in different locations so we do not put anyone with a protected characteristic at a disadvantage.

### **Promotion**

- It is in our best interest to provide an equal opportunity for promotion to all our staff.
- Therefore, managers should continually appraise the promotion potential of their team, giving due consideration to any special training and development needs an individual may require.
- All opportunities will be published on the company intranet (internal) and the company webpage and social media (external).
- All promotion decisions will be made in conjunction with objective and equally applied selection criteria, irrespective circumstances.
- For learners or job applicants with disabilities, efforts will be made to provide 'reasonable adjustments' to lessen any effects of the disability during recruitment and selection and to provide equality of opportunity, e.g., recruitment information available in large print or Braille.
- It is advisable that applicants are asked, prior to interview, if they have specific requirements so that reasonable adjustments can be made in advance.

- At interview, any impairment should only be discussed objectively in relation to the intrinsic job requirements. This should provide an opportunity for the applicant to describe any adjustments, for example adapted computer equipment, which may be required to undertake the role.
- If necessary, we will seek expert help in assessing disability and exploring possibilities for appropriate and practical adjustments.
- We will endeavour to help apprentices, learners or staff who become disabled during their working life and wherever possible will assist in their rehabilitation and training.
- We will audit our premises on a regular basis to assess disability access. Where it is not possible to make changes to premises in the short term, alternative accessible venues will be identified that do not disadvantage the candidate.
- Access requirements will be routinely determined prior to any applicant/client visits.
- We will review the company property portfolio with a view to migrating to accessible properties wherever it is appropriate to do so.

### **Reasonable adjustments**

We will always consider what changes or 'reasonable adjustments' we could make to the workplace, or to the way work is done, which would assist towards overcoming the effects of the disability for our staff, apprentices and learners. Because of the diverse nature of disabilities, it is very difficult to generalise about what adjustments could be considered reasonable therefore every case will be assessed individually, (this applies to job applicants and learners).

### **Cultural and Religious needs**

Where staff and learners have a cultural or religious need which may conflict with existing job requirements, we will consider if it is possible to vary or adapt those requirements. When considering such matters, Managers must seek to balance the operational requirements of the business with the needs of the individual.

## Monitoring

The purpose of monitoring is to check that discrimination does not occur, either directly or indirectly in relation to all apprentice and learner undertakings. The monitoring is carried out via Equal Opportunity forms that are completed on joining the Company and analysed annually in relation to starter, leavers, training opportunities and promotion opportunities.

The SLT is responsible for monitoring and reviewing the Equality Policy and all related policies.

## Procedure

Any member of staff who fails to observe and comply with, the requirements of the Equality and Diversity Policy, will be subject to the Company's disciplinary procedure. Additionally, we will take appropriate action in the event that any of our apprentices or learners feel they have been mistreated. In situations where it is believed that discrimination has occurred, any complaint will be instigated initially through the following grievance procedure:

A formal written complaint should be made either to the Line Manager, Skills Coach or the SLT. This should include:

- The nature of the alleged discrimination.
- The other person/s involved in the alleged discrimination.
- Dates and times when the incident/s occurred.
- Names of any witness.
- Any supporting documentation that is relevant.

The individual will be asked by the SLT to provide a full statement in order that a formal investigation may be conducted.

All complaints will be handled promptly in a strictly confidential manner, unless the complainant agrees to information gathered being disclosed to aid the investigation. If the complaint proves valid, prompt disciplinary action will be taken to prevent the recurrence of any such discrimination. In the event that the discrimination is found





to have taken place by parties external to the company, we will take appropriate action to support our staff, apprentices, learners and other Associates.

### **Review Cycle**

To be reviewed annually by the Quality Team. Next review date January 31<sup>st</sup> 2022.