




## Equality, Diversity and Inclusion Policy

Policy Owner	Maria Reason
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## 1. Introduction

**This policy is a high-level overarching policy and sits on top of detailed policies/procedures and guidance.**


- KS Training is committed to providing equal opportunities in education, training and employment for its learners, staff, and employers.  
This is shared and acted on by all KS Training staff and is the overall responsibility of the Managing Director, Head of Quality and the Board of Directors.  
The impact and effectiveness of our policy and the importance we place upon it, is central to our organisational values. We aim to prepare learners for successful life in modern Britain and promote the fundamental British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different backgrounds, faiths and beliefs. We will provide a safe environment where learners are able to speak out about radicalisation, extremism and harassment.  
KS Training are committed to learners, supporting them to gain knowledge and understanding on how to protect themselves from the risks associated with radicalisation, extremism, forms of abuse, grooming and bullying, including through the use of social media.

The policy reflects national legislation and guidelines on good practice:

- Equality Act 2010
- Human Rights Act 1998

KS Training is committed to fully implementing all current equality legislation. We keep legislation under review to ensure full compliance.

As part of our accountability as an employer, KS Training will ensure all staff receive appropriate induction in relation to their personal rights and responsibilities regarding equal opportunity legislation and the implementation of our own policy and procedures.

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**Protected characteristics:**

- 1. Age
- 2. Disability
- 3. Gender reassignment
- 4. Marriage & civil partnership
- 5. Pregnancy and maternity
- 6. Race
- 7. Sexual orientation
- 8. Religion and belief
- 9. Sex

*KS Training is committed to removing conditions which place people at a disadvantage and will actively work to prevent prejudice and discrimination. KS Training will, where reasonably possible, focus public funding on individuals who are disadvantaged and least likely to participate in education and training and will work with other partners to widen participation and support learners' progression for further learning working towards career aspirations.*

KS Training promotes and expects all Directors, employees, learners, employers, and stakeholders to implement this policy.

The 2010 Act now includes some of these protections to characteristics to which employers and business owners must be aware of the seven different types of discrimination under the new legislation.

These are:

**1. Direct Discrimination**


Direct Discrimination occurs when someone is treated less favorably than another person because of a protected characteristic they have or are thought to have (see Perceptive Discrimination below), or because they associate with someone who has a protected characteristic (see Associative Discrimination below).

**2. Associative Discrimination**

This already applies to Race, Religion or Belief and Sexual Orientation. It is now extended to cover Age, Disability, Gender Reassignment and Sex. This is direct discrimination against someone because they associate with another person who possesses a protected characteristic.

**3. Perceptive Discrimination**

This already applies to Age, Race, Religion or Belief and Sexual Orientation. It is now extended to cover Disability, Gender Reassignment and Sex. This is direct discrimination against an individual because others think they possess a particular protected characteristic.

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It applies even if the person does not actually possess the characteristic.

#### 4. Indirect Discrimination

This already applies to Age, Race, Religion or Belief, Sex, Sexual Orientation and Marriage and Civil Partnership. It is now extended to cover Disability and Gender Reassignment.

Indirect Discrimination can occur when you have a condition, rule, policy or even a practice in your organisation that applies to everyone but particularly disadvantages people who share a protected characteristic.

#### 5. Harassment

Harassment is "unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating an individual's dignity or creating intimidating, hostile, degrading, humiliating or offensive environment for that individual".

Employees will now be able to complain of behavior that they find offensive even if it is not directed at them, and the complainant need not possess the relevant characteristic themselves. Employees are also protected from harassment because of perception and association.

#### 6. Third Party Harassment

This already applies to Sex. It is now expected to cover Age, Disability, Gender Reassignment, Race, Religion or Belief and Sexual Orientation.

The Equality Act makes you potentially liable for harassment of your employees by people (third parties) who are not employees of your company, such as customers or clients.

#### 7. Victimisation


Victimisation occurs when an employee is treated badly because they have made or supported a complaint or raised a grievance under the Equality Act; or because they are suspected of doing so. The Equality Act amends the definition 'victimisation', so that no longer needs to point to a comparator.

## 2. Breadth of this Policy

All areas of KS Training provision and working partnerships both internal and external, such as learners and employers are covered by this policy.

## 3. Implementation and Accountability

The CEO, Directors and Head of Quality are responsible for promoting equal opportunities on behalf of KS Training. They are also responsible for ensuring that effective policies and procedures are in place to ensure the continued improvement of equality, diversity, and Inclusion throughout the organisation to the benefit of all its users. At a strategic level, our policy will be reviewed periodically in conjunction with statistics, emerging trends, and legislation to ensure it remains relevant, current,

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and reflective of internal and external influencing factors.

4. How we monitor the promotion, implementation and effectiveness of this policy with Staff, Learners and Employers

**The Managing Director and HR** is responsible for implementing, reviewing and the effectiveness of KS Training's Equal Opportunities Policy relating to the employment of staff.

**The Managing Director, Head of Quality and HR** is responsible for ensuring that equal opportunities are continuously promoted. Which includes monitoring and evaluation of its overall effectiveness both internally and externally, with staff, learners, employers, and subcontractors. External specialist companies maybe sourced to complete and external review further.

**All Directors, Managers and Staff** are responsible for creating a safe, welcoming and inclusive environment free from any direct or indirect discrimination promoting equal opportunities at all times.


KS Training Ltd are responsible for promoting equal opportunities and putting our policy into practice within all aspects of their work, creating an inclusive and welcoming environment for all. We aim to provide a safe environment free from any form of direct or indirect discriminatory behaviour. All will not tolerate prejudiced behaviour. The promotion of fundamental British values is at the heart of our work.

KS Training will work to protect learners from radicalisation and extremism and respond swiftly where learners are vulnerable to these issues.

**All Learners** receive teaching and learning in relation to Equality, Diversity, and Inclusion as part of their program. Throughout teaching and learning activities learners understanding, commitment to Equal Opportunities and its implementation is contextualized enhancing learners knowledge.

**All Employers** receive Information, Advice & Guidance about the apprenticeship program that learners will be enrolling onto with KS Training. Each employer will receive a contract, TNA and Health and Safety questionnaire as part of the onboarding process. This includes knowledge and accessibility to KS Trainings Equality, Diversity and Inclusion Policy. In addition, employer's understanding and commitment to equal opportunities and its implementation is monitored throughout the learner's program and captured in reviews, training, employer surveys and any other relevant opportunities.

5. Policy Content and Breaches To Our Policy

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- KS Training seeks to ensure equality of opportunity and the fair treatment for all those involved in our activities.
- KS Training will not tolerate, and will eliminate, any discrimination, harassment victimisation or bullying. This applies to all regardless of seniority, gender, religion, age, race/ethnicity, disability, religious or belief persuasion, marital status, and sexual orientation, gender reassignment or any other grounds. All parties are open to challenge any breach of this policy by making a formal complaint as per KS Trainings Complaints Policy.

## KS TRAINING Ltd WILL WORK ACTIVELY TO ADVANCE PROGRESSION IN THE BELOW KEY AREAS


### Participation of Learners, Retention and Achievement

KS Training supports learners regardless of gender, age, ethnicity, disability, religious or belief persuasion, gender reassignment, marital/civil single status, sexual orientation, or pregnancy/maternity. We understand that sometimes your background can determine some of your learning needs. KS Training will work to ensure these are met.

KS Training Ltd will make all reasonable efforts to meet the special needs of any individual arising from religious or cultural obligations.

### Monitoring, Evaluation and Targeting Achievement

- KS Training will monitor full learner data on the basis of race, gender, disability, and age and other protected characteristics to ensure that all groups of learners achieve and that any gaps in progress and attainment between different groups of learners are reviewed, and narrowed. Where variation is found in the achievement of different groups of learner’s interventions will be taken.
  - Learners make progress during their program compared with their starting points, with particular attention to progress by different groups of learners.
1. KS Training monitors staff in relation to a number of protected characteristics including religion and sexual orientation and is expanding its scope to include other protected categories. Any indication of inequality will be investigated and acted upon, such as under-representation of groups.
  2. Feedback from quarterly/annual learner/employer surveys will be used to ascertain the effectiveness of our policy. Monthly learner retention and achievement data will be collected to underpin the survey results and formally reviewed to assist target setting; these processes will assist in confirming the success of our policy in terms of recruitment, retention and achievement. This will also identify any themes for specific action and assist benchmarking our performance against previous years. Leaver analysis will be collected monthly and reviewed alongside the above; any identified trends will be used to make targeted improvements.

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Learners with severe and complex special educational needs will be encouraged to gain skills and progress to become more independent in their everyday life and/or progress to positive destinations such as work trials, employment, or further education.


- We will assist learners with special educational needs to become more independent in their everyday life by providing an enriching and relevant curriculum.
  - Learners will be encouraged to provide feedback and/or raise concerns through our safeguarding team.
3. Monitor staff religion/belief and sexual orientation and expand to include all nine protected characteristics to remove any unforeseen barriers to learning and employment.

### Harassment and Discrimination

KS Training will protect learners from harassment, victimisation, discrimination or bullying of any kind. All learners, staff, employers and Subcontractors and Suppliers are required and expected to uphold these values.

### Meeting the needs of the Learner, Recruitment and Widening Participation

- The selection criteria applied to both staff and learners internally and by an employer will be assessed against how well a candidate can meet the requirements of the job description; meaning selection is made on ability to do the job/undertake training for the job.
- Recruitment of staff and volunteers will be subject to DBS checks appropriate to safeguarding principles.
- We will actively monitor our recruitment and staff development practice to measure our effectiveness in applying equality, diversity and inclusion to the recruitment, development and promotion of employees.
- Records of interviews are stored according to the company's procedures and include the reasons why applicants were not selected.
- Positive Action - Employers have been entitled to encourage applications from groups they reasonably consider to be under-represented in their industry. KS Training will use this option where relevant.
- KS Training respect the diversity of learners and wherever possible will draw on examples of cultural community backgrounds within teaching, training or assessment materials and marketing activities. Materials will NOT contain negative insulting stereotypes on any grounds.

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- KS Training will engage Learners know how to keep themselves fit and healthy, both physically and emotionally.
- Enrichment activities will allow all learners to explore personal, social and ethical issues and take part in life in community activities and the wider society in Britain.
- All Staff respect each other and learners, and learners are expected to respect all staff and each other.


#### Celebrating diversity and promoting positive role models

- KS Training will reflect and promote positive contributions of all regardless of gender, age, race/ethnicity, disability, religious or belief persuasion, marital/civil or single status, sexual orientation or gender reassignment. It will ensure that our marketing plans reflect our policy and any special incentives to highlight under-represented groups/occupational areas. Where relevant, advertising will include our statement: “KS Training –We are an equal opportunities employer and training provider, and we encourage applications from underrepresented groups”.
- KS Training will actively promote staff and training development in equal opportunities for all employees.
- KS Training will monitor and review the course materials and learning resources to ensure they are appropriate and promote, where appropriate, equal opportunities and do not contain any stereotypical or insulting images.
- We will ensure our teaching, learning and assessment promote equality, raise awareness of diversity and tackle discrimination, victimisation, harassment, stereotyping, radicalisation and bullying.
- KS Training will review on an annual basis the effectiveness of our complaint’s procedures designed to assist learners, employers, staff and Suppliers which will raise any issue under equal opportunities or any other grievances.
- KS Training will ensure that our policy is understood and upheld by all those who work with us including staff, learners, employers, Suppliers and partner organisations.

#### Review of KS Training’s Equal Opportunities Policy

The policy will be reviewed in full on an annual basis to ascertain its effectiveness. Where fundamental changes are made, stakeholders will be informed. This report will in part inform the Self-Assessment Report and the Quality Improvement Plan. Revision of Performance Indicators may be adjusted following this process.

#### 6. Training of Staff to Ensure Implementation Of Policy


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All KS Training staff will receive training on the policy and its implementation during their induction period. They will then receive refresh training on an annual basis and implementation of the policy will be monitored during the OTLA process.

### Associated Policies

There are further policies in support of this Equality, Diversity and Inclusion policy covering areas such as discipline and grievance, safeguarding, data protection, Code of conduct behaviour and harassment and disabilities which can be requested if required.

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## ANNEX 1

### EQUALITY, DIVERSITY & INCLUSION DEFINITIONS

#### Understanding Equality, Diversity & Inclusion

By the proactive use of equal opportunity, experiencing discrimination or being disadvantaged can be prevented or stopped through legislation and positive intervention. Equality of Opportunities is to ensure that no group receives less favorable treatment and encompasses the nine protected characteristics.

#### **Racism**

All attitudes, procedures, and patterns – economic, social and cultural – whose effect (though not necessarily whose conscious intention) is to create, maintain and extend the power, influence and privilege of one group of people over another. An implicit set of negative beliefs about a racial or ethnic group can result in offensive or violent behaviour towards members of a racial or ethnic group.

#### **Sexism**

All attitudes, procedures, and patterns – economic, social and cultural – whose effect (though not necessarily whose conscious intention) is to create, maintain and extend the power, influence and privilege of people of one sex over people of the other.

#### **Prejudice**

An opinion or feeling about people of a different group, which is formed beforehand, without informed knowledge, thought or reason and which is likely to be sustained even in the face of evidence to the contrary.

#### **Discrimination**

Less favorable treatment of an individual or group, which is not based on their work performance or conduct as a member of staff or student.

#### **Indirect Discrimination**

This occurs when a requirement or condition is applied which, whether intentionally or not, adversely affects a particular individual or group considerably more than others and cannot be justified.

#### **Disability Discrimination**


Less favorable treatment of an individual or group on account of their disability or, if without justification, a reasonable adjustment is not made.

#### **Institutional Discrimination**

This occurs when a person or a group of people become discriminated against on the basis of any of the nine protected characteristics as a result of the arrangements and accepted practices within an institute.

#### **Racial Discrimination**

Less favorable treatment of an individual or group on account of their racial origin or colour.

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**Sexual Discrimination**

Less favorable treatment of an individual or group on account of their gender, marital status or sexual orientation.

**Age Discrimination**

Age Regulations make it unlawful to discriminate against an individual or a group on account of their age.

**Harassment**

Can be directed at any group or individual and can include unnecessary touching, unwanted physical contact, leering, personal remarks, verbal or written abuse, visual displays, coercion, isolation or non-co-operation.

**Sexual Harassment**

Unwanted conduct of a sexual nature or other conduct based on sex affecting the dignity of men or women at work. Repeated and/or unwanted verbal or sexual advance, sexually explicit or derogatory statements or sexually discriminatory remarks.

**Racial Harassment**

Conduct (whether by act or omission) which is intended to cause or does cause, physical or mental distress to an individual or group on account of their colour, race, nationality, or ethnic origins.

**Victimisation**

This occurs when a person is treated less favorably than others because that person has made a complaint or allegation of discrimination or has acted as a witness or informant in connection with proceedings under any of the relevant Acts or has been involved in any other way in their enforcement or intends to do any of these.

**Equal Rights**

The achievement and respect of equal civil rights for all.