

## Equality and Diversity & Inclusion Policy

Keyturn Training is committed to encouraging equality, diversity and inclusion among our workforce and learner intake, eliminating unlawful discrimination. All employment and learner recruitment decisions are the legitimate business decisions of Keyturn Training.

The aim is for our workforce and learner intake to be truly representative of all sections of society and our customers, and for each employee to feel respected and able to give their best.

Keyturn Training - in providing goods and services - is also committed against unlawful discrimination of customers or the public

### The policy's purpose is to:

- Ensure we do not unlawfully discriminate because of the Equality Act 2010 protected characteristics of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality, and ethnic or national origin), religion or belief, sex (gender) and sexual orientation and set out the guidelines of what to do should someone feel they have been discriminated against.
- Identify, monitor, oppose and avoid all forms of unlawful discrimination. This includes in pay and benefits, terms and conditions of employment, dealing with grievances and discipline, dismissal, redundancy, leave for parents, requests for flexible working, and selection for employment, promotion, training or other developmental opportunities
- Promote and encourage equality, fairness and respect for all in our employment, whether temporary, contracted, part-time or full-time in practice as a legal requirement creating a working environment free of bullying, harassment, victimisation and unlawful discrimination, promoting dignity and respect for all, and where individual differences and the contributions of all staff are recognised and valued.
- Clarify ways to support learners/apprentices throughout their training to be treated fairly within the same parameters of the employees mentioned above

### The organisation commits to:

- Promoting equality of opportunity for all persons.
- Promoting a good and harmonious learning/training environment.
- Learners being treated with respect.
- Preventing and acting upon occurrences of unlawful direct discrimination, indirect discrimination, harassment and victimisation.
- Taking lawful affirmative or positive action, where appropriate.

- Regarding all breaches of equal opportunities policy as misconduct, which could lead to disciplinary proceedings.
- Fulfilling all our legal obligations under the equality legislation and associated codes of practice.

## Responsibilities:

- Managing Director to ensure their CPD is maintained up to date in line with changes to the legislation surrounding Equality Act 2010, Human Rights Act 1998 and Protection from Harassment Act 1997.
- Managing Director to ensure that training of the managers and all other employees about their rights and responsibilities under the equality policy. Responsibilities include staff conducting themselves to help the organisation provide equal opportunities in employment, and prevent bullying, harassment, victimisation and unlawful discrimination, this is discussed at induction, outlined in the staff/ employee handbook and updated yearly (or as changes occur) through annual training or bulletins. Making opportunities for training, development and progress available to all staff, will help and encourage individuals to develop their full potential, so their talent
- All staff and learners should understand they, as well as their employer, can be held liable for acts of bullying, harassment, victimisation and unlawful discrimination, in the course of their employment, against fellow employees, customers, suppliers and the public.
- Keyturn Training take seriously complaints of bullying, harassment, victimisation and unlawful discrimination by fellow employees, customers, suppliers, learners, visitors, the public and any others in the course of the organisation's work activities. Such acts will be dealt with as misconduct under the organisation's grievance and/or disciplinary procedures, and any appropriate action will be taken. Particularly serious complaints could amount to gross misconduct and lead to dismissal without notice

Further, sexual harassment may amount to both an employment rights matter and a criminal matter, such as in sexual assault allegations. In addition, harassment under the Protection from Harassment Act 1997 - which is not limited to circumstances where harassment relates to a protected characteristic - is a criminal offence

- Decisions concerning staff progression being based on merit (apart from in any necessary and limited exemptions and exceptions allowed under the Equality Act)
- Review employment practices and procedures when necessary to ensure fairness, and also update them and the policy to take account of changes in the law, this will be reviewed on an annual basis at board meeting, or when a change of law is passed
- Monitor the make-up of the workforce regarding information such as age, gender, ethnic background, sexual orientation, religion or belief, and disability in encouraging equality and diversity, and in meeting the aims and commitments set out in the equality policy. This is monitored and reviewed on an annual basis by both the company directors. *For qualifications this is also reviewed by the qualification provider. This is linked to the company KPI's, Ofsted self-assessment report and ILM's diversity policy.*

Monitoring will also include assessing how the equality policy, and any sporting action plan, are working in practice, reviewing them annually, and considering and taking action to address any issues. This is monitored and assessed by the directors at board meetings

- Creating a safe learning environment for learners/apprentices by giving them the opportunities available without discrimination. Adapting the learning to best fit the needs of the learner and reviewing the delivery and administration to assist in the learner journey.

Reviewing and adapting will also include keeping in regular contact with customer to review the development to make sure all needs are being met. Support for the assessor and training team will be given by the company directors and any additional need for training will be met.

The equality policy is fully supported by senior management and has been agreed with the board of directors Cheryl Shepherd, Managing Director and Brian Trott, Learning and Development Director

Details of the organisation's grievance and disciplinary policies and procedures can be found in the employee handbook. This includes with whom an employee should raise a grievance - usually their line manager.

Use of the organisation's grievance and/or disciplinary procedures does not affect an employee's right to make a claim to an employment tribunal within three months of the alleged discrimination.

For learners and employers, the complaints and appeals policy can be found in the candidate handbook and on the website at [www.keyturn.co.uk/policies/](http://www.keyturn.co.uk/policies/)

## Promoting the Policy:

This policy is promoted through the following:

- Website: the policy is available to view on the Keyturn website - [www.keyturn.co.uk/policies/](http://www.keyturn.co.uk/policies/)
- Apprentice/Learner Handbook: the link to this policy is referenced in the handbook that is given to each apprentice/learner at the beginning of their training session
- Apprentice/Learner Induction: all learners who attend an apprenticeship or ILM programme are given details of this policy to familiarise themselves with equality and diversity both within their workplace and throughout their learning with Keyturn. As part of the apprenticeship induction apprentices are given some online training on the Equality Act to help develop understanding
- Apprentice Reviews: Each month the apprentice has a review meeting with their assessor, as part of this review the apprentice has an opportunity to feedback to the assessor any issues they may be having with regards to Equality and Diversity in the workplace and within their apprenticeship training programme.
- Staff Induction: This policy forms part of the induction process for any new staff or training team.
- Employee Handbook: the employee handbook is given to new employees to read through prior to starting their role. They are then asked to sign to confirm they have read and understood the policy
- Trainer Handbook: the trainer handbook is given to new trainers to read through prior to starting their role. They are then asked to sign to confirm they have read and understood the policy
- Staff Training - for new staff or trainers, in addition to the induction process, Keyturn also offer training using our Videotile training programme - <https://keyturn.co.uk/business-skills-online-training/>

- Notification of updates: All staff, trainers, apprentices are contacted with any changes made to the policy

Updates/Reviews		
6/3/2020	Document reviewed and updated to meet ESFA requirements	CJS
21/4/2021	Document reviewed - Promoting the policy section	CJS
10 May 2022	Document reviewed	CJS
November 2022	Next review - to add how we monitor quality and diversity	CJS
July 2023	Updated to adjust responsibilities point 7	CJS

Signed: 

Date: 26/07/2023