

# Equality & Diversity Policy

Version 7

Completed Date: 30<sup>th</sup> August 2024

Review Date: 30<sup>th</sup> August 2025

## 1. Policy Statement

### 1.1 Aims and values

First Step Training is committed to advancing equality of opportunity for all. First Step Training celebrates and values the diversity brought to its workforce and student body by individuals and is committed to meeting the needs of a diverse apprentice population within a multi-cultural society. First Step Training seeks to ensure that individuals and communities have equal access to learning programmes and facilities, to be responsive to the changing demographic of the local area, and to play an active role in community cohesion.

First Step Training will treat all employees, workers and apprentices with respect and dignity, and seeks to provide a working environment free from discrimination, harassment or victimisation. First Step Training will seek to eliminate discrimination on grounds of age, class, disability, employment status, ethnic origin, gender, marital status, pregnancy and maternity, nationality, religion, sexual orientation, gender reassignment or special needs.

First Step Training aims to create a working and learning environment where there are positive relations between different groups of people. To this end, First Step Training undertakes to provide training and support for staff, to consult with staff about their experience of the working environment, and to provide diverse images in any material that it produces. The aim is to create an inclusive ethos where issues of racism, bullying, stereotyping and discrimination can be discussed openly, where there is a shared commitment to challenging and preventing all kinds of discrimination, and where there is respect for diversity and difference.

**1.2 Scope of the equality policy:** This equality policy covers all issues relating to equality, diversity, and inclusion in First Step Training. This policy seeks to comply with the requirements of the Equality Act 2010 and best practice.

**1.3 Communication to staff, apprentices, and other stakeholders:** Our commitment to equality, diversity and inclusion will be highlighted in our prospectus, annual self-assessment report, annual equality information report, and annual financial statement. Our equality policy will be published on First Step Training website.

First Step Training will seek to ensure that:

- Senior leaders, staff, apprentices and employers are aware of our equality policy and the action needed for its implementation.
- Staff, apprentices and employers are aware of the value placed upon equality of opportunity and that action will be taken in the event of any breach of this scheme.
- Senior leaders and staff have access to comprehensive information, which assists them to plan, implement and monitor actions to carry out their responsibilities under this policy.



#### 1.4 Dealing with complaints

First Step Training will seek to provide a supportive environment for those who make claims of discrimination or harassment. Acts of discrimination (direct or indirect), harassment, victimisation or abuse will be treated as serious disciplinary offences (see Section 5 'Compliance').

#### 1.5 Review

The equality policy will be reviewed periodically to ensure that it is up to date, relevant, effective and compliant with current legislation.

### 2. Duty identification and Responsibilities

#### 2.1 Protected Characteristics

The following characteristics are the protected characteristics defined by the Equality Act 2010 (in alphabetical order):

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion and belief
- Sex
- Sexual orientation

#### 2.2 General and specific duties

Under current equality legislation First Step Training has a general duty to have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation
- Advance equality of opportunity between people who share a protected characteristic and those who do not
- Foster good relations between people who share a protected characteristic and those who do not
- Remove or minimise disadvantages suffered by people due to their protected characteristics
- Take steps to meet the needs of people from protected groups where these are different from the needs of other people

First Step Training acknowledges it has specific duties to:

- Within its SAR and QIP - publish an annual report to demonstrate compliance with general equality duties
- Within its SAR and QIP - prepare and publish one or more objectives that First Step Training thinks it needs to achieve to further any of the aims of the
- general equality duty, and review these at least every four years



## 2.3 Meeting the specific duties

In order to meet the specific duties described above First Step Training will:

- Where necessary, assess the impact of its policies on apprentices and staff across the nine protected characteristics
- Monitor the admission and progress of apprentices and the recruitment and career progress of staff by ethnicity, disability, gender, age, faith and sexual orientation
- Set out arrangements for publishing the results of assessments and monitoring
- Monitor the diversity within apprenticeship provision against national averages.

## 2.4 Other types of discrimination

First Step Training has a responsibility to address other types of discrimination that are not direct. These include:

- Indirect discrimination – this can occur if a rule or policy disadvantages a particular protected characteristic.
- Associative discrimination – this is discrimination against an individual because he/she associates with another person who possesses a protected characteristic.
- Discrimination by perception – this is discrimination against a person because others think he/she possess a protected characteristic.
- Harassment – College employees are entitled to complain of behaviour they find offensive even if it is not directed at them.
- Harassment by a third party – First Step Training is potentially liable for harassment of their staff or apprentices by people not employed by First Step Training. e.g harassment of an apprentice on work experience.

## 2.5 Roles and Responsibilities

### *The Senior Leadership Team*

It is the responsibility of the SLT to ensure that First Step Training meets its legal obligations with respect to the general and specific duties. SLT members are responsible for ensuring that:

- First Step Training strategic plan includes a commitment to equality
- Equality training is mandatory for all staff
- They are aware of the SLT's statutory responsibilities in relation to equality legislation as an employer and service provider
- They receive and respond to the EDI monitoring information on apprentices and staff

### *Management*

Managers are responsible for putting policies into practice. They are responsible for implementing the equality policy. They must ensure they are aware of First Step Training's statutory duties in relation to legislation:

- All aspects of First Step Training policy and activity are sensitive to the issues faced by different protected characteristics
- Group monitoring information is collected and analysed
- Targets are set on the recruitment, retention and achievement of apprentices based upon the analysis of the EDI monitoring information
- Teaching observation reports include criteria on equality issues where appropriate



- Curriculum areas are required to assess performance in relation to protected characteristics as part of the programme review and self-assessment process, and to take action as appropriate
- The procedures for staff recruitment and career development enshrine best practice in equal opportunities

### *Staff*

All staff have responsibilities for promoting equality and fostering good relations between different groups. All staff have responsibilities to eliminate discrimination on grounds of race, gender, disability or any of the protected characteristics. Staff are responsible for ensuring that:

- They are aware of First Step Training's statutory duties in relation to legislation
- Their schemes of work, lesson content and teaching resources demonstrate sensitivity to issues of equality
- They challenge inappropriate behaviour by either apprentices, work placement providers or other members of staff
- It is the responsibility of First Step Training and each of its individual members of staff to confront discrimination, whether witting or unwitting, whenever it occurs

### *Apprentices*

Apprentices as key stakeholders also have a role and responsibility to comply with policies:

- apprentices should be made aware of First Step Training ethos and policies at induction, through publicity and events, and through the embedding of EDI in teaching and learning.
- apprentices should make every effort to understand and support First Step training's single equality scheme. They should treat all other apprentices, staff, and visitors with respect and dignity.
- apprentices must show respect for other people's cultural traditions and religious beliefs and participate in initiatives designed to promote good relations.
- apprentices should report any incidents of discrimination, harassment, or bullying
- using First Step Training's anti-bullying and harassment and complaints procedures.

### *Marketing*

First Step Training will ensure that all publicity materials present appropriate images that reflect our diversity and send out positive messages about different groups of people.

## **2.6 Positive action**

First Step Training undertakes, once the results of monitoring are available, to consider targets to reduce any disadvantage suffered by employees and apprentices due to any protected characteristic. If monitoring reveals that specific groups are especially disadvantaged, some targets may relate to those specific groups.

Positive action strategies are intended to be temporary measures only. They will be kept under regular review as they cannot be used once the special needs have been met or if the under-representation no longer exists. First Step Training will ensure that when using positive action as a strategy, it falls within the law.



### **3. Equality Policy Implementation**

#### **3.1 How the Policy is implemented**

First Step Training will seek to ensure that all policies and procedures (e.g. recruitment and selection procedures for staff and apprentices) are non-discriminatory, and that the monitoring and positive action processes are regularly reviewed and monitored.

#### **3.2 Action plan**

Equality and diversity objectives and an action plan will be produced annually. This should highlight First Step Training's progress in meeting its general and specific duties. Production of the action plan is the responsibility of the Training Manager. The SLT will regularly review progress on the action plan.

#### **3.3 Training**

SLT members receive equality and diversity training at induction. All staff must complete Equality and Diversity training on joining First Step Training. Additional bespoke equality training is organised or made available to staff at all levels within First Step Training. All staff involved in recruitment and selection attend recruitment and selection courses.

#### **3.4 Assessing the impact of the equality policy**

First Step Training has a duty to assess the effect of the equality policy on staff and apprentices with different protected characteristics. It will do this by setting and monitoring equality and diversity targets. Each curriculum area is required to comment on equality and diversity issues within their area in the annual Self -Assessment Report. Each area must include at least one Equality and Diversity target within their Quality Improvement Plan.

Progress on these targets are monitored throughout the year at Performance Reviews. First Step Training will also monitor a wide variety of data according to race, gender and other protected characteristics. The range of data to be considered is outlined in Section

### **4. Impact assessment and monitoring**

#### **4.1 Apprentices**

First Step Training has a duty to monitor the admission and progression of apprentices. To inform the setting of targets and to assess the effect of the equality policy, First Step Training will collect and analyse the following information by ethnicity, gender, age, ability, and where applicable, sexual orientation and faith:

- Group profiles of apprentices
- Applications, and success and failure rates for admission to programmes
- Retention rates
- Achievement rates
- Work placements including success rates, satisfaction levels and job offers
- Disciplinary action
- apprentice satisfaction feedback
- Complaints by apprentices or their sponsors



## 4.2 Staff

First Step Training has a duty to monitor the recruitment and career development of staff. To inform the setting of targets and to assess the effect of the equality policy, First Step Training will collect and analyse the following information by ethnicity, gender, age, disability, sexual orientation and faith:

- Group profiles of employees by grade/salary scales and type of work
- Job application rates
- Selection success rates
- Type of contract (permanent, temporary)
- Training/Staff development
- Career progression, application and success rates
- Disciplinary/capability proceedings
- Grievances
- Exit surveys

## 4.3 Publishing the results

The detailed equality data described in sections 4.1 and 4.2 will be published annually and will be reviewed regularly by SLT.

A summary of the results of our monitoring information will be included in our annual self-assessment report, annual equality information report and annual financial statements, where this does not breach individual confidentiality.

## 5. Compliance

### 5.1 Sanctions

#### *Apprentices*

Any discriminatory behaviour by apprentices, including that directed against staff, will be dealt with under the apprentice disciplinary procedure. Any student who suffers discrimination, or who is aware of it happening to someone else, should report it to one of the following: their Tutor or the Training Manager. Disciplinary action can then be taken against those responsible. Incidents will be investigated according to First Step Training's anti-bullying and harassment or complaints procedures.

## Access to Fair Assessment

First Step Training is committed to providing ongoing support to learners with particular requirements and aspires to eliminate discrimination. On this basis, we ensure accessible services and make appropriate adjustments, where required, to facilitate learners in completing the course/programme as independently as possible. Our personnel are committed to contributing to this practice and the overall aims are to assist learners in managing their individual situation and create a more accessible learning and assessment environment for all. In order for this to be achieved, we aim to determine learners' particular requirements and requests for the provision of access arrangements at an early stage through initial assessment. In making sure our access to fair assessment statement is implemented effectively and all learners are treated fairly, we aim to:



- ensure the access to fair assessment statement and practice are understood and complied with by any personnel involved in assessment and also by learners
- promote equality in relation to the provision of the learning programme and assessment of the qualification
- adhere to related procedures and regulations regarding reasonable adjustments to assessment and special consideration
- ensure buildings and assessment sites used for delivery and assessment are accessible to all learners, as far as is practicable
- request permission for the implementation of specific adjustments from the awarding body where required
- ensure appropriate equipment/personnel (technological equipment or any assistant personnel, i.e. reader, scribe, practical assistant, etc.) is available for selected adjustments to delivery and/or assessment
- use assistive equipment and personnel within the reasonable adjustments framework, as outlined by 1st4sport, without disadvantaging others who are not affected by particular requirements.

Learners have the right to raise any issues related to the implementation of access arrangements or make a formal complaint via the First Step Training learner complaints procedure or the First Step Training learner appeals procedure, if they are not satisfied with the outcome of the decision in relation to the access arrangements applied.

#### Procedure for Access Arrangements

##### *Stage 1:*

First Step Training evaluates and identifies the need for the implementation of access arrangements due to a learner's particular requirements, where a learner reports the request to the tutor/assessor or where it is identified via other acceptable means. At this stage, the learner must provide all necessary evidence (medical evidence/certification, diagnostic test results, a statement from the Invigilator/Tutor/Assessor or any other appropriate information) to demonstrate the condition or reason(s) affecting his/her performance.

##### *Stage 2:*

The Tutor/Assessor communicates the request to Training Manager who checks the learner's eligibility. The manager collates all evidence required and helps the learner to make the application for reasonable adjustments/special consideration.

##### *Stage 3:*

If access arrangements as requested by the learner are not appropriate and the application is rejected by First Step Training or the Awarding Body, other alternatives will be suggested, where required. If the application for access arrangements is accepted, the decision is communicated to all personnel involved in the delivery and/or assessment and arrangements are made as soon as practicable to assist the learner.



*Stage 4:*

Monitoring of the eligibility of decisions made, outcomes of the applications and effectiveness of the procedure is conducted via the established Awarding body procedure. The Training Manager will ensure that the learner completes an evaluation of the effectiveness of the access arrangements and reports this via Athena.

All records relating to the application, relevant evidence and monitoring forms are securely retained in line with the General Data Protection Regulations.

