



**MONTEBELLO**  
TRAINING

**P01**

# **Equality & Diversity Policy** **(Including Disability Statement and** **Preventing Radicalisation)**

Details of person responsible for this policy

Name Erika Crellin Position Hairdressing Tutor  
Signature *E. Crellin* Date April 24  
Review Date April 25



## **Equality & Diversity**

The purpose of this policy is to provide equality and fairness for all in their employment and training and not to discriminate because of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, ethnic origin, skin colour, nationality, national origin, religion or belief, sex and sexual orientation. We oppose all forms of unlawful and unfair discrimination.

All employees will be helped and encouraged to develop their full potential and the talents and resources of the workforce will be fully utilised to maximise the efficiency of the organisation. Selection for employment, promotion, training, or any other benefit will be based on aptitude and ability. All employees, whether part-time, full-time or temporary, will be treated fairly and with respect. Montebello Training is committed to eliminating discrimination and encouraging diversity amongst our workforce and client groups. Our aim is that our workforce will be truly representative of all sections of society and each employee feels equal, respected and able to contribute.

Montebello Training will do the utmost to ensure all employees, students and clients feel valued and respected by their employer and by each other and are treated with dignity. A working environment which celebrates differences and similarities alike and where this diverse experience makes a positive contribution to learning, teaching, support services, research, consultancy, administration and management. Every employee and student are entitled to a working environment that promotes dignity and respect to all. No form of intimidation, bullying (including cyber-bullying) or harassment will be tolerated. Our Zero-tolerance commitment will be communicated to all staff and students.

Montebello Training ensures their workforce is responsive to training and employment opportunities and is representative of the diversity of clients and employees of Montebello Training. At Montebello Training there are opportunities for progression where staff and clients alike are encouraged to achieve highly and attain their full potential in society. Any breaches of our equality and diversity policy will be regarded as misconduct and could lead to disciplinary proceedings.

Montebello Training will ensure good practice in the form of consistent and relevant criteria for selection and training. Grievance and disciplinary procedures will be established, used and monitored from within, as will all other conditions of employment and work practices. Montebello Training opposes all discrimination and will engage in positive and proactive challenge of discrimination using laid down procedures.

Montebello Training is operationally bound to work within the contractual terms of certain organisations such as the Skills Funding Agency and/or the Young Persons Learning Agency, in respect of Government funding entitlements and associated age banding. However bespoke services are made available to all clients under published and competitive 'Private Funding Rates' irrespective of any other qualifying criteria.

## **Social inclusion / exclusion**

Montebello Training understands that groups of individuals become socially excluded for many and varied reasons and often a combination of factors, including:-Discrimination because of race, gender or sexual orientation, disability, mental health, unemployment, low income, substance and drug use, unlawful behaviour, homelessness, diminished opportunity to access education and associated lack of basic skills, because English is not their first language or because they are asylum seekers or refugees.

In addition to being excluded because of one or more of these factors, many people live in geographic communities, which, are themselves, deprived and as such, may experience additional discrimination because of where they live.

Montebello Training acknowledges that without support and or active intervention, access to training or realistic work opportunities that many vulnerable young people will grow up to become excluded adults. Whilst these examples illustrate the diversity of issues and multiplicity of factors, which can lead to social exclusion, they are not an exhaustive list.

## **Legislation**

In addition to its social responsibility, Montebello Training recognises the statutory requirements laid down in legislation: -

### **The Equality Act came into force in October 2010 providing a modern, single legal framework for tackling disadvantage and discrimination.**

The Equality Act is the Government's new law to make sure all people are treated fairly. It affects people in England, Scotland, and Wales. The purpose of this new Act was to make the equality laws clearer and stronger. It brings together 9 big equality laws and around 100 smaller laws. Bringing these laws together makes it a lot easier for employers and other people to know what they must do. It will also help everyone understand the law.

The nine big equality laws that have merged are:

- Equal Pay Act 1970
- Sex Discrimination Act 1975
- Race Relations Act 1976
- Disability Discrimination Act 1995
- Employment Equality (Religion or Belief) Regulations 2003
- Employment Equality (Sexual Orientation) Regulations 2003
- Employment Equality (Age) Regulations 2006
- Equality Act 2006, Part 2
- Equality Act (Sexual Orientation) Regulations 2007

The Equality Act helps many of the different groups of people in England, Scotland and Wales who sometimes get treated unfairly:

- Men and women
- People of different races
- Disabled people
- People with different religions/beliefs or no religions/beliefs
- People of different ages
- Lesbian, gay, bisexual and straight individuals
- People who have changed their sex (Trans-gender individuals)

### **Protected Characteristics**

The Equality Act 2010 introduces the notion of 'protected characteristics' which it will monitor to ensure fairness. These are the grounds upon which discrimination is unlawful. The characteristics are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

### **Equality and Diversity Definitions**

The primary definition and scope of this policy is intended to focus improvement activities on the following:

#### **Equal Opportunities**

This is often described as 'everyone being the same'. This is somewhat out-dated and today when we talk about equality, we describe it in terms of everyone being different, but treated with an equal level of respect and having equal access to services, training, employment, statutory rights etc.

#### **Diversity**

Diversity is about valuing and embracing the differences in people, whether that relates to gender, race, disability, age or a host of other individual characteristics which may or may not be covered by legislation. Diversity can be said to describe the range of visible and non-visible differences that exist between people. One of the ways that Montebello Training embraces diversity is implicit in the following statement: 'Celebrate our differences; celebrate our similarities'.

#### **Discrimination Definitions**

The following definitions have been sourced via current employment legislation and advisory bodies such as the Equality and Human Rights Commission (EHRC) and Advisory, Arbitration and Conciliation Service (ACAS).

**Direct Discrimination:** This is when someone is treated less favourably than another because of a protected characteristic they have or are thought to have, or because they associate with someone who has a protected characteristic.

**Indirect Discrimination:** This is when a condition, criteria, rule or even a practice in the workplace applies to everyone, but particularly disadvantages people who share a protected characteristic.

**Dual Discrimination:** is when someone is treated worse than other people because of a combination of two things, including:

- Being a woman or a man
- A transsexual
- Disabled
- lesbian, gay, bisexual or heterosexual (straight)
- Their age
- Their religion or belief
- Their race

### **Implementing Montebello Trainings commitment to anti-discriminatory practices.**

Any qualifications or requirements for a job which effectively restrict it to applicants of one gender, to single people or to a single group of people, shall apply only if they are justifiable in terms of the job to be done i.e., a 'genuine occupational requirement' (Glossary).

All staff will undertake systematic compulsory equality and diversity awareness training and induction, annual equality, and diversity CPD.

Where appropriate staff will be given additional training, appropriate reasonable adjustment, and encouragement to ensure they achieve equality of opportunity within the organisation.

Age limits for employment should not be restrictive unless they affect a person's ability to carry out the duties as outlined in the job description/s. It is the assertion of this Company that this would be rare and unlikely.

Each individual should be assessed according to her or his actual capacity to carry out a given job. It should not be assumed that certain work is relevant to only women or only men; this is illegal except in circumstances where gender is a genuine occupational requirement. e.g., Requiring a male/female to protect the dignity of men/women in a residential establishment. Montebello Training will not collude in any practice/s or requests by any external agent/s which it believes discriminatory or a contravention to this policy. Furthermore, Montebello Training will effectively challenge external agent/s in such circumstances, offering advice, guidance or awareness training where appropriate.

Action will be taken to provide increased employment opportunities for people who live with a disability and to ensure that assumption is not made about the ability to do certain work. This action will include various measures to increase physical access to and within Montebello Training. Montebello Training's leadership and management will continue to prioritise and implement systematic access improvements through the implementation of Access Audit detailing these in our Disability Statement and making this publicly available through Montebello Training website.

A positive working and learning environment will be fostered and maintained so that all staff and students can, when they wish to, be open about their sexual identity/orientation and lifestyle and culture without fear of discrimination or less favourable treatment. Montebello Training endorses the reality that people who identify as lesbian, bi-sexual, trans-gender and gay, culturally or otherwise, are distinct or different from, not inferior to heterosexuals.

Montebello Training undertakes proactively to ensure that its' employees, students, employers or placement providers have solid and meaningful policy, procedure and training to guide and support best practice methods of conduct and professional practice in respect of equality and diversity. Staff will be provided with Handbooks (containing policy and procedures) and compulsory training and annual CPD; students will be provided with comprehensive initial assessment, induction resources and training; employers will be provided with employer manuals (containing policy and procedures) and where willing to attend training at reduced and competitive prices, sufficient to understand equality and diversity and effectively challenge discrimination in all forms.

Montebello Training will work actively and strategically to comply with the Equality Act 2010 in every respect of complying with or exceeding requirements to make reasonable adjustments for access to buildings and inclusive training programmes and employment for staff and clients alike.

### **Victimisation**

**Victimisation** is punishing or treating an individual unfairly because they have made a complaint, or are believed to have made a complaint, or who has or believed to have supported someone who has made a complaint/grievance or reported a discriminatory incident. Victimisation is covered in the Equality Act 2010 and is illegal. It is unlawful to treat less favourably than another person/s, someone who has made a complaint of discrimination or someone who has given evidence in a complaint, where that complaint was brought in good faith.

Victimisation can occur for example, by 'overlooking' the (complaining) individual for promotion or a pay rise, giving unnecessary burdensome duties or finding some spurious reason for dismissal.

### **Oppression (definitions).**

**Racism** consists of a combination of power and prejudice at a personal, structural and institutional level. It is having the power to put into action, one's prejudice at the expense of a particular group, individual, race or culture. Power is an ability to make things happen or prevent them from happening. Prejudice is an unfavourable opinion, feeling, action or judgement, often based on a person's race, skin colour, ethnic or national origin.

The importance of ensuring that all racist incidents are reported and recorded is an accepted principle in combating racial discrimination. The Macpherson Report (Investigating the circumstances which led to the death of Stephen Lawrence) recommended that a new definition of a racist incident should be universally adopted by the police, local government and other relevant agencies, that being:

**"A racist incident is any incident, which is perceived to be racist by the victim, or any other person."**

The report explains that: This means that if anyone – the victim, a witness, a police officer or a council official – perceives an incident as racist, it should be recorded as such, regardless of any dissenting views.

Montebello Training provides Multi-Agency Racial Incident Support Packs for training, information and reporting of racist incidents.

**Sexism** occurs at a personal, structural and institutional level. Sexist attitudes often imply traditional or stereotypical values and roles for men or women, which when enforced can and do lead to less favourable treatment/discrimination. Often sexist views of women involve a belief that women are inferior to men and/or have a specific role to play, which is to serve the needs of men, i.e., either as wife and carer or for sexual gratification. Sexism also involves the use of power to maintain this view of women as a reality.

**Homophobia** is discrimination against lesbians, gay men and bisexuals at a personal, structural and institutional level. **Homophobia** is the irrational fear of, aversion to, or discrimination against homosexuality or homosexuals. It can also mean hatred, hostility, disapproval of, or prejudice towards homosexual people, sexual behaviour, or cultures.

### **Different racial and minority communities**

Montebello Training is opposed to all forms of racism and discrimination. Montebello Training and its representatives will enforce this policy and all that it encompasses to ensure and enable all individuals a fair and equal chance of developing their skills, abilities progression and achievements. Montebello Training will make full and effective use of its' actual and potential staffing resources. Moreover, members of different racial and minority communities will have a special knowledge and experience which is of value to the services that Montebello Training provides to its' multi-racial and multi-cultural community.

Montebello Training is aware of the ways in which people from different racial and ethnic communities experience discrimination, both through overt racism and indirectly, by the imposing of inappropriate selection criteria for employment etc. For example, expectation or assumption about speech, style of dress and self-presentation at interviews which may discriminate against people from different racial and ethnic minority communities.

Recruitment and Selection Procedures will be implemented systematically and will be kept under review to ensure they are not directly or indirectly discriminatory; that individuals are selected, promoted and treated on the basis of skill, merit and ability. Montebello Training recognises that, although it is not legally required, positive measures are allowed by the Equality Act 2010, to encourage employees and potential employees (by means of training) into employment, where people from particular racial communities have been underrepresented in particular types of work. Montebello Training will utilise these legal measures to develop and maintain a representative workforce.

Montebello Training recognises that racial harassment is a major form of discrimination and totally condemns it. This exists in many forms ranging from physical abuse to more subtle ways of creating uneasiness and discomfort for people different racial and ethnic communities. An equality and diversity policy cannot be successful unless racial harassment is dealt with immediately and effectively.

### **Implementation of Policy and Commitment to Training**

Montebello Training has an active commitment to equality of opportunity in employment of staff, in the provision of its services to students and fosters recognition of this policy within its' commercial networking with employers and partnerships with external agents. Montebello Training will strive to ensure that its services are equally available to all people. It will resist and challenge all forms of discrimination and will actively support staff, students and other clients when confronted by such, including the use of disciplinary procedures to uphold the principles of this policy.

Montebello Training will make public its Equality and Diversity Policy and will make it available to all staff, students, placement providers, associated employers and clients.

All staff, contractors, students, placement providers and associated employers have a personal responsibility to work in accordance with and foster promotion of this policy and the principles within.

All staff and students will receive free certificated and nationally accredited Equality and Diversity Awareness Training, either as an integral part of their staff induction/CPD



processes or as part of their chosen Apprenticeship Framework. Understanding and compliance with this policy document forms an integral aspect of the above-mentioned awareness training.

### **Monitoring**

The purpose of monitoring is to ensure that this policy is being implemented. Equal Opportunities monitoring forms will be integral to or issued with all employee and trainee applications.

Statistical information gained from monitoring in conjunction with the Human Resources Department will be directed to the Equal Opportunities Co-ordinator, on a quarterly basis for evaluation and analysis. Recommendations and reports will be presented to Managing Directors and all staff at Company meetings and annually during Self-Assessment Reporting.

Montebello Training will regularly monitor the statistical information in relation to the access to services by all sections of the community and proactively address under-representation. Action and improvement that arises out of analysis of statistical data monitoring will be agreed and published through annual self-assessment processes and quality improvement plans.

### **Contravention of the policy**

Victimisation, discrimination, and harassment will only stop if everyone acknowledges its' reality and existence. The body of people who comprise Montebello Training have a responsibility to ensure that victimisation, discrimination, and harassment does not take place and when and if it does it is identified and reported. Montebello Training will ensure appropriate investigation and remedial action and support is provided in the event of a contravention of policy being reported.

In the event of any contravention of this policy Montebello Training's disciplinary or grievance procedures will be initiated to investigate the allegation/s. Where the relevant investigation finds that a contravention of the policy has taken place appropriate disciplinary action will be enacted and recorded. In some cases, however, the grievance or disciplinary panel by making explicit that certain behaviours are unacceptable (formal reprimand), may eliminate the problem without need for further formal action. Informal action will only be taken when all parties (including the complainant) concerned agree this is sufficient and appropriate. No one will ever be treated as if they have been oversensitive about an issue.

It is understood that people are often afraid to report incidents, for fear that no one will believe them or that they will be ostracised and told that they have 'no sense of humour'. At worst people can feel that they will be accused of provoking the incident or fear a denial of future opportunities or services. Montebello Training will take seriously any reported incident and investigate it fully in accordance with internal procedures. The Public Interest Disclosure Act 1998 (Whistleblowing) provides protection for workers to disclose outside of the organisation where a matter of concern has been reported in writing within the organisation and has either been ignored or remained unresolved.

Montebello Training will ensure that prompt action will be taken when policy contraventions arise. A reported incident must be dealt with in accordance with Montebello Training's grievance and or disciplinary procedure/s.

Timescales for responding to grievances and disciplinary contraventions are detailed within these policies.

All reports of policy contraventions will be reported to the E&D officer within Montebello Training in a confidential and objective manner.

### **Dismissal, Discipline and Grievance Procedures**

Since October 2004, all companies are required by law to have written (statutory minimum 3 step requirement) Dismissal, Discipline and Grievance procedures. Whether dealing with a grievance or disciplinary matter the essence of the new statutory 3 steps are the same: -

- Step 1. Put it in writing.
- Step 2. Meet and discuss.
- Step 3. Provide the right to Appeal.

These procedures must be made available to all staff, available in the staff handbook. It is also invariably the norm that Companies have a formal complaints process for clients.

Disciplinary and grievance procedures provide a clear and transparent framework to deal with difficulties which may arise as part of working relationships from either the employer's or employee's perspective. They are necessary to ensure that everybody is treated fairly in similar circumstances, to ensure issues are dealt with fairly and reasonably and that they are compliant with current legislation.

All individuals should have access to and be aware of the procedures within their own company. Line Managers and Supervisors within companies have the responsibility to ensure that all staff are aware of Montebello Training's systems and procedures and how to use them. Whilst employees may never need to use these procedures; it is vitally important that they know what to do, how to go about it and who to report it to.

At Montebello Training all staff receive a structured three-month probation/induction period and a staff handbook which contains all people policies, systems, and procedures. This handbook contains Montebello Training Complaints and Dismissal, Disciplinary & Grievance procedures.

Most employers would introduce you to their written policies, systems and procedures when being initially inducted into Montebello Training and during probation.

At Montebello Training students are introduced to Montebello Training's complaints, grievance, and disciplinary procedures straight away, either at the training centre on 'Induction Day' or at their workplace during their 'First Visits' from their personal assessor. These procedures are reproduced in the individual Learning Plan (ILP). Students who experience difficulties with the delivery of their training/assessment or relationships with Montebello Training staff or fellow students should refer to the Dismissal, Disciplinary and Grievance Procedures.

If you are aware that another person is being unfairly treated or harassed at work you should encourage them to seek support and speak out in whatever way they feel they can, send an e-mail, a letter, ask someone else to say it for them, but do what you can to ensure they get help to follow their company grievance procedures.

**Students Remember:** that whether you are employed or not; as a Montebello Training student, funded by the Skills Funding Agency or otherwise, you are covered by the principles and covenants of this policy and as such entitled to ask for our help if you have concerns relating to equality and diversity matters around your employment or your training and assessment.

### **Equality Legislation Prior to the Equality Act 2010**

Civil Partnership Act 2004

Data Protection Act 1998

Disability Discrimination Act 1995

Disability Discrimination Act 1995 (Amendment) Regulations 2003 (2005 Disability Equality Duty)

Disability (Meaning of Disability) Regulations 1996

Disability (Blind & Partially Sighted Persons) Regulations 2003

Employment Equality (Religion or Belief) Regulations 2003

Employment Equality (Sexual Orientation) Regulations 2003

Employment Rights Act 1996

Employment Relations Act 1999 & 2004

Equal Pay Act 1970

Equal Pay Act 1970 (Amendment) regulations 2003

Equality Act 2006

Gender Recognition Act (GRA) 2004

Human Rights Act 1998

Maternity and Parental Leave etc. regulations 1999

Part Time Workers Regulations 2000

Public Interest Disclosure Act 1998

Protection from Harassment Act 1997

Race Relations Act 1976

Race Relations (Amendment) Act 2000 & (Race Equality Duty)

Rehabilitation of Offenders Act 1974

Sex Discrimination act 1975

Sex Discrimination (Gender Reassignment) Regulations 1999

Sex Discrimination act 1975 (Amendment) Regulations 2003 & (Gender Equality Duty 2007)

Special Educational Needs & Disability Act (SENDA) 2001

## **Disability Statement**

- Montebello Training is committed to equality, diversity and social inclusion for all our staff and students. To this end we seek to remove any barriers which could impede any person's full participation in the programmes we undertake, or which could be an obstacle to their gaining the benefits of those programmes.
- Montebello Training seeks to work with each individual staff member or student to understand the needs they may have and see how these can be met. These needs may relate to learning difficulties, disabilities or other general needs. In each case we shall undertake a plan to ensure that the need of the individual shall not prevent them from achieving their personal goals or from gaining as much as possible from the time they spend with us.
- Everyone's need is different and as such they are encouraged to discuss them with us. They should be aware that all our staff are ready to give advice and support at any time. We aim to ensure that your need should not prevent you from achieving training, education, employment and personal fulfilment.

# Preventing Radicalisation

## Background

This 'Preventing Radicalisation Policy' is part of our commitment to keeping children safe. Over the last few years, global events have led to a growth of extremist viewpoints, including advocacy of violent extremism.

Schools and colleges have an important part to play in both educating children and young people about extremism and recognising when students start to become radicalised. In March 2015, new statutory duties were placed on schools and colleges by the Counter Terrorism and Security Act (2015) which means they must work to prevent children being drawn into extremism.

Safeguarding children from all risks of harm is an important part of the schools and colleges work and protecting them from extremism is one aspect of that.

## Ethos

At Montebello Training we ensure that through our values and rules teaching we promote tolerance and respect for all cultures, faiths and lifestyles.

We have a duty to prepare our children for life in modern Britain and to keep them safe. Students who attend our centre have the right to learn in safety. We do not tolerate bullying of any kind and will challenge derogatory language and behaviour towards others.

## Statutory Duties

The duty to prevent children and young people being radicalised is set out in the following documents.

- Counter Terrorism and Security Act (2019)
- Keeping Children Safe in Education (2019)
- Prevent Duty Guidance (2015)
- Working Together to Safeguard Children (2018)

## Non-statutory Guidance

- Improving the spiritual, moral, social and cultural (SMSC) development of students: supplementary information (DfE 2014)

## Related Policies

- Equal and Diversity Policy (including
- Safeguarding Policy (including child protection)
- Information Technology Policy
- Safer Working Practices (Code of Conduct) Policy
- Complaint, Grievance, Malpractice & Whistle-blowing Policy

## Definitions

**Extremism** is defined in the 2011 Prevent strategy as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

**Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

**British Values** are democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs.

## **Roles and Responsibilities**

### **Role of the Managing Director**

It is the role of the managing director to:

- ensure that the centre and its staff respond to preventing radicalisation on a day-to-day basis,
- ensure that the centre's teaching staff addresses the issues involved in radicalisation.
- ensure that staff conduct is consistent with preventing radicalisation.

### **Role of Designated Safeguarding Lead**

It is the role of the designated safeguarding lead to:

- ensure that staff understand the issues of radicalisation, are able to recognise the signs of vulnerability or radicalisation and know how to refer their concerns.
- receive safeguarding concerns about children and young people who may be vulnerable to the risk of radicalisation or are showing signs of radicalisation.
- make referrals to appropriate agencies with regard to concerns about radicalisation.
- liaise with partners, including the local authority and the police.

### **Role of staff**

It is the role of staff to understand the issues of radicalisation, are able to recognise the signs of vulnerability or radicalisation and know how to refer their concerns.

### **Training**

We are committed to ensuring that our students are offered broad and balanced training that aims to prepare them for life in modern Britain. We encourage our students to be inquisitive students who are open to new experiences and are tolerant of others.

This supports the development of the whole child as a reflective learner within a calm, caring, happy and purposeful atmosphere. Teaching the centres values alongside the fundamental British Values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just and civil society.

### **Internet Safety**

The internet provides children and young people with access to a wide range of content, some of which is harmful. Extremists use the internet, including social media, to share their messages.

We limit access to the internet via Wi-Fi with a restricted password.

We are aware that children and young people have access to unfiltered internet when using their mobile phones and staff are alert to the need for vigilance when students are using their phones.

Students and staff report internet content that is inappropriate or of concern to the managing director.

## **Staff Training**

Staff are given training to help them understand the issues of radicalisation, are able to recognise the signs of vulnerability or radicalisation and know how to refer their concerns. This information also forms part of induction safeguarding training. Staff are updated as necessary in weekly safeguarding briefings.

## **Safer Recruitment**

We ensure that the staff we appoint to the centre are suitable, our recruitment procedures are rigorous, and we follow the statutory guidance published in part 3 of *Keeping Children Safe in Education (2019)*. Vetting and barring checks are undertaken on relevant people.

Visitors to the centre are made aware of our safeguarding and child protection policies on arrival and are given information about what to do if they are concerned about any aspect of child welfare.

We undertake due diligence to ensure that visiting speakers are appropriate. Speakers will be supervised at all times and will not be allowed to speak to students without a member of staff being present.

Staff must not invite speakers into the centre without first obtaining permission from the Managing Director.

‘No platform for extremists’

The centre is vigilant to the possibility that out-of-hours hire of the premises may be requested by people wishing to run an extremist event. The centre does not engage in community use of the building and its site.

## **Signs of vulnerability**

There are no known definitive indicators that a young person is vulnerable to radicalisation, but there are number of signs that together increase the risk. Signs of vulnerability include:

- underachievement
- being in possession of extremist literature
- poverty
- social exclusion
- traumatic events
- global or national events
- religious conversion
- change in behaviour.
- extremist influences
- conflict with family over lifestyle
- confused identify.
- victim or witness to race or hate crimes.
- rejection by peers, family, social groups, or faith

## **Recognising Extremism**

Early indicators of radicalisation or extremism may include:

- showing sympathy for extremist causes
- glorifying violence, especially to other faiths or cultures
- making remarks or comments about being at extremist events or rallies
- evidence of possessing illegal or extremist literature.
- advocating messages similar to illegal organisations or other extremist groups
- out of character changes in dress, behaviour, and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent.)
- secretive behaviour
- online searches or sharing extremist messages or social profiles.
- intolerance of difference, including faith, culture, gender, race or sexuality.
- graffiti, artwork or writing that displays extremist themes.
- attempts to impose extremist views or practices on others.
- verbalising anti-Western or anti-British views
- advocating violence towards others

## **Referral Process**

Staff and visitors to the centre must refer all concerns about children and young people who show signs of vulnerability or radicalisation to the Designated Safeguarding Lead using the usual methods for reporting other safeguarding concerns.

When there are significant concerns about a pupil, the Designated Safeguarding Lead in liaison with the Managing Director will make a referral to the appropriate body.



# Appendix 1 - Guidance for Apprenticeship programmes

## Purpose

This guidance to Equality and Diversity within the apprenticeship programmes is a supplement to the company's general Equality and Diversity policy and aims to address specific processes for the implementation and embedding of good practice in equality and diversity practice within the apprenticeship space.

## Scope

This supplementary guidance applies to apprentices, apprenticeship programme staff and relevant stakeholders.

## Aim

This guidance supplements the aims and principles that are detailed in the policy and aims to clarify how the policy is applied in apprenticeship programmes.

## Promotion and commitment

The promotion of and commitment to the principles detailed in the policy are embedded in processes and procedures for apprentices and employees through multiple means, including, but not limited to:

- Inclusion of the policy in the staff recruitment process
- Providing effective Information, Advice and Guidance (IAG) to all apprenticeships, ensuring it is presented in a format that is easily understood by all potential apprentices and employers
- Provide clear entry criteria to each apprenticeship, ensuring a transparent approach to initial and eligibility assessments
- Apprentice induction provides a general overview of equality and diversity, introducing them to the policy and topic
- Expectations of behaviour in the Apprentice Commitment Statements
- Development of an Individual Learning Programme (ILP) ensuring all apprentices have an ILP that meets their learning needs and ensures full participation
- Apprentice teaching, assessment and reviews
- Equality, Diversity and Inclusion (EDI) calendar, identifies enrichment activities throughout the year that promotes EDI proactively throughout the academic year
- Curriculum that promotes equality, celebrates diversity and tackles discrimination, stereotypes and promotes British values
- Encouraging apprentices to explore equality and diversity issues and how it can impact them and others personally and professionally
- Staff performance review
- Embedding equality and diversity principles throughout all policies, procedures and working practices.
- End Point Assessment Reasonable Adjustment Guidelines

All employees received a briefing on equality and diversity and the organisation's values at orientation.

Employees dealing directly with apprentices, complaints and appeals, special considerations and student/apprentice support services are expected to regularly attend CPD sessions to ensure their understanding and implementation of processes and procedures that support equality and diversity are up-to-date and in line with current best practice.

Equality, diversity and widening participation are considered as fundamental considerations in the design, development, and delivery of all of our programmes and are formally considered as part of programme validation and review processes.

## **Recruitment**

Recruitment materials for apprenticeships will recognise and celebrate diversity, highlighting support which is available for learners. This will also outline requirements for the apprenticeship relating to professional experiences and development, but not personal or individual characteristics. Our employee recruitment processes include reference to the policy including competency-based assessment of how well a candidate feels they can meet the organisational values.

Apprenticeship cohorts are currently recruited through the employer, as well as through us, and our programme design, our ability to create bespoke offerings and tailor assessment methods to employer requirements support our ability to provide apprenticeship programmes that both appeal to and cater to a diverse cohort of apprentices.

## **Equality and diversity and apprenticeship programme delivery**

Equality and diversity are embedded throughout all stages of our apprenticeship training programmes and is implemented through the following actions:

- Where the company is asked to support the recruitment of an apprentice for an employer, this will be carried out in line with the Safer Recruitment and Selection Policy, using practices that support equality and diversity
- The promotion and marketing of apprenticeship programmes will avoid the use of discriminatory language and approaches to recruitment.
- Processes for the recruitment of apprentices onto an apprenticeship training programme, including initial diagnostic activities and assessment of eligibility, will not preclude any individual from joining a programme based on a protected characteristic.
- Enrolment processes will capture information relating to SEND so that an Individual Support Plan can be put in place where required and in agreement with the apprentice. This will incorporate any reasonable adjustments and special considerations to enable fair access to teaching, learning and assessment. The company staff working with the apprentice will be briefed on the support agreed with the apprentice and ensure that the apprentice is not disadvantaged.
- The Designated Safeguarding Lead will undertake a risk assessment for any apprentice with SEND requirements to ensure they can access a safe place to learn.
- Apprentices will be given access to this policy and their induction will include input on equality and diversity. They will be briefed on action to take if they have an equality and diversity concern.
- Equality and diversity and this policy will be discussed with apprentice employers to ensure there are processes in place to protect apprentices and raise related issues.
- Monitoring of progress, achievements and destination will include the analysis of data relating to SEND students with actions planned and implemented to address any impact identified.
- Equality and diversity will be discussed with apprentices at progress reviews and support given in addressing any issues that arise.

- Equality and diversity will be embedded into teaching and learning activities as appropriate.
- The learning environment will be planned to ensure that it is accessible to all apprentices.
- Any reasonable adjustments and special considerations needed for on-programme assessment will be discussed with apprentices so that appropriate action can be taken.
- Any reasonable adjustments or special considerations needed for end point assessment will be discussed with the end point assessment organisation.

### **Safeguarding**

A Safeguarding policy and procedure is in place within the company to protect individuals from harm, abuse, maltreatment, neglect, radicalisation, or exploitation. Staff, associates, learners/apprentices may become aware of a situation involving harassment and bullying because of a safeguarding/prevent issue. Where this is the case, the Safeguarding policy and procedures must be implemented alongside this policy.

### **Monitoring**

Monitoring Apprentice achievement and success is undertaken through internal and published Qualification Achievement Rates. This will look at gender, ethnicity, disabilities and difficulties, different standards, and levels and those from disadvantaged areas to identify any significant differences in achievement between these groups. This will be supported through the use of apprentice surveys, voice and focus groups to gain further information from apprentices and assess their perception of the company's provision.

The Managing Director will regularly brief the Senior Leadership Team on the progress in promoting equality and diversity for the Apprenticeship Programme, which will include benchmarking our EDI monitoring data (EDIMS) against sector companies, demographics and best practice standards.

### **Review**

This policy will be reviewed on an annual basis or following changes to Government updates and company risk assessment policies and processes.

## **Glossary of terms**

### **Act**

A law or piece of legislation passed by both Houses of Parliament and agreed to by the Crown, which then becomes part of statutory law (i.e., is enacted).

### **Affirmative Action**

Positive steps taken to increase the participation of under-represented groups in the workplace. It may encompass such terms as positive action and positive discrimination. The term, which originates from the United States of America, is not used in the Equality Act.

### **Age**

This refers to a person belonging to a particular age group, which can mean people of the same age (e.g., 32 year olds) or range of ages (e.g. 18 - 30 year olds, or people over 50).

### **Agent**

A person who has authority to act on behalf of another ('the principal') but who is not an employee.

### **All reasonable steps**

In relation to harassment by an employee, all the things which the employer could reasonably have done to stop it; in relation to reasonable adjustments, 'reasonable steps' is another term for the things that the employer could reasonably have done to remove the disadvantage.

### **Alternative format**

Media formats which are accessible to disabled people with specific impairments, for example Braille, audio description, subtitles, and Easy Read.

### **Anticipatory duty**

For service providers, the duty to make reasonable adjustments is anticipatory; within reason, it is owed to all potential disabled customers and not just to those who are known to the service provider.

### **Auxiliary aid**

Usually, a special piece of equipment to improve accessibility.

### **Auxiliary service**

A service to improve access to something often involving the provision of a helper/assistant.

### **Black**

Defined by black people themselves not only to describe skin colour but also specific life experiences and cultural aspects of life. Therefore 'black' is used to encompass a range of people from different racial groups.

### **Bullying**

Bullying can be described as persistent actions, criticism or personal abuse, either in public or private, which humiliates, denigrates, undermines, intimidates or injures the recipient.

**Bi-sexual**

Physical and or emotional attraction to men and women.

**'Come out'**

(or 'out') A process, which involves being open and honest about one's sexuality. More specifically, lesbians, bi-sexual and gay men who have previously kept their sexuality hidden and then make a decision to 'come out' or declare their sexuality openly. 'Outing' someone means openly informing others about an individual's sexuality, without their permission to do so.

**Code of Practice**

Is a statutory guidance document which must be taken into account by the Courts when applying the law and which may assist people comply with the law?

**Different needs**

Refers to the different requirements that people with protected characteristics may have which either must or should be met to provide equality, including equality of opportunity and access.

**Direct discrimination**

Less favourable treatment of a person compared with another person because of a protected characteristic.

**Disability**

A person has a disability if she/he has a physical or mental impairment, which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.

**Disadvantage**

A detriment or impediment – something that the individual affected might reasonably consider changes their position for the worse.

**Disadvantaged**

When someone suffers a detriment or finds an impediment to enjoying a benefit in comparison with others because of a characteristic of theirs; encountering a pre-existing barrier which is inherent in their workplace, but which doesn't have the same effect on others

**Disabilism**

(or abilism) A concept that distinguishes a certain proportion of society (those who have a physical disability, a mental illness, or emotional, behavioural or learning difficulty) from the so-called 'able-bodied' majority.

**Discriminate unlawfully.**

When an employer has treated someone less favourably because of a protected characteristic (discriminated against them) and does not have a valid defence.

**Discriminating directly or indirectly**

Refers to discrimination because of a person's protected characteristic (direct); or discrimination that occurs when a provision, criteria or practice is applied that creates disproportionate disadvantage for a person with a protected characteristic as compared to those who do not share that characteristic (indirect).

**Duty to make reasonable adjustments.**

Where a disabled person is at a substantial disadvantage in comparison with people who are not disabled, there is a duty to take reasonable steps to remove that disadvantage by (i) changing provisions, criteria or practices, (ii) altering, removing or providing a reasonable alternative means of avoiding physical features and (iii) providing auxiliary aids.

**Equal pay audit**

Comparing the pay of women and men who are doing equal work in an organisation and investigating the causes of any pay gaps by gender or working pattern. The provisions in the Act directly relating to equal pay refer to sex equality but an equal pay audit could be used applied to other protected characteristics to help an employer equality proof their business.

**Equal work**

A woman's work is equal to a men in the same employment (and vice versa) if it is the same or broadly similar (like work); rated as equivalent to his work under a job evaluation scheme or if she can show that her work is of equal value to his in terms of the demands made of her.

**Equality policy**

A statement of an organisation's commitment to the principle of equality of opportunity in the workplace.

**Equality training**

Training on equality law and effective equality practice.

**Gay**

The term adopted by the Gay Liberation Movement of the 1960's in an attempt to affirm a 'truly joyous and alternative lifestyle' and to replace the term 'homosexual'. Homosexual men use 'Gay' predominantly.

**Gender reassignment**

The process of changing or transitioning from one gender to another.

**Genuine occupational requirement**

Where having a protected characteristic is an occupational requirement, certain jobs can be reserved for people with that protected characteristic (e.g., Women support workers in women's refuges; Ministers of Religion).

**Harassment**

Unwanted behaviour that has the purpose or effect of violating a person's dignity or creates a degrading, humiliating, hostile, intimidating or offensive environment. See below for sexual harassment.

**Marriage and civil partnership**

Marriage is defined as a 'union between a man and a woman'. Same-sex couples can have their relationships legally recognised as 'civil partnerships'. Civil partners must be treated no less favourably than married couples.

**Positive action**

Refers to a range of lawful actions that seek to overcome or minimise disadvantages (e.g., in employment opportunities) that people who share a protected characteristic have experienced, or to meet their different needs.

### **Pregnancy and maternity**

Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

### **Protected characteristics**

These are the grounds upon which discrimination is unlawful. The characteristics are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

### **Provision, criterion or practice**

Identifying a provision, criterion or practice is key to establishing indirect discrimination. It can include for example, any formal or informal policies, decisions, rules, practices, arrangements, criteria, conditions, prerequisites or qualifications.

### **Public bodies**

Public bodies are defined as bodies which have a role in the processes of national Government but are not a Government department or part of one. They operate to a greater or lesser extent at arm's length from Ministers.

### **Public sector equality duty**

The duty on a public authority when carrying out its functions to have due regard to the need to eliminate unlawful discrimination and harassment, foster good relations and advance equality of opportunity.

### **Race**

Refers to the protected characteristic of race. It refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.

### **Religion or belief**

Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (e.g. atheism). Generally, a belief should affect your life choices or the way you live for it to be included in the definition.

### **Sex**

This is a protected characteristic. It refers to whether a person is a man or a woman (of any age).

### **Sexual harassment**

Any conduct of a sexual nature that is unwanted by the recipient, including verbal, non-verbal and physical behaviours, and which violates the victim's dignity or creates an intimidating, hostile, degrading or offensive environment for them.

### **Sexual orientation**

Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.

**Transsexual person**

Refers to a person who has the protected characteristic of gender reassignment. This may be a woman who has transitioned or is transitioning to be a man, or a man who has transitioned or is transitioning to be a woman. A trans-gendered ('trans', transsexual) person believes that they have been born into the wrong physical anatomy for their 'true' gender. Transsexuals are prepared to change their physical anatomy, through surgery and hormone treatment. The medical explanation describes this as gender dysphoria. There is an estimated 35,000 to 65,000 people in the UK, who according to Press for Change, feel convinced that they have been born into the wrong body.

**Transvestite**

A transvestite chooses to dress and act like members of the opposite sex. Many people find it hard to accept that a man or woman chooses to dress in this way and often, because of their physical appearance, transvestites suffer ridicule and hostility from the general public and rejection from their families. It is not against the law to be a transvestite or transsexual. Transsexualism and transvestism have no connection with homosexuality other than some transsexuals and transvestites are lesbian or gay.

**Victimisation**

Subjecting a person to a detriment because they have done a protected act or there is a belief that they have done a protected act i.e., bringing proceedings under the Act; giving evidence or information in connection with proceedings under the Act; doing any other thing for the purposes or in connection with the Act; making an allegation that a person has contravened the Act.

**Worse**

When someone is treated less favourably, they are treated worse than someone else, literally something which is not as good as someone or something else.