

## Equality, Diversity and inclusion (EDI) policy

*Please note that this SharePoint version of this policy is the only version that is maintained. Any printed copies should, therefore, be viewed as 'uncontrolled' and as such, may not necessarily contain the latest updates and amendments.*

### Statement

As a skills and support provider with a high level of commitment to community provision and the opening up of the construction sector to those who have not always been given equal access, The Skills Centre is dedicated to raising awareness of equality and human rights, promoting diversity and combating all forms of inequality, disadvantage, prejudice, unfair discrimination, harassment and mistreatment within our community.

The Skills Centre is committed to achieving a working and learning environment which provides equality of opportunity and freedom from unlawful discrimination on the grounds of race, sex, pregnancy and maternity, marital or civil partnership status, gender reassignment, disability, religion or beliefs, age or sexual orientation. This Policy aims to remove unfair and discriminatory practices within the Company and to encourage full contributions from its diverse communities, including learner, employer, funder, strategic partner and education stakeholders. The Skills Centre is committed to actively opposing all forms of discrimination through taking direct and sustained action in accordance with the Equality Act 2010 and subsequent guidance under the PSED (Public Sector Equality Duty) listed in schedule 149 of the

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/85041/equality-duty.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/85041/equality-duty.pdf).

All of The Skills Centre's policies and operational procedures aim to project and enable equality of access and opportunity to all sections of our community.

### Scope

This policy applies to all service users and stakeholders of The Skills Centre Limited. The Skills Centre Limited reserves the right to amend at any time.

The Skills Centre Limited is committed to ensuring equality is embedded throughout all of its activities. The Skills Centre Limited is committed to creating an environment

where all learners, apprentices, employees, contractors, partners, community organisations and employers, irrespective of their circumstances and/or background:

- Are treated fairly
- Are treated equally
- Are fully respected
- Are listened to and encouraged to offer their views and opinions
- Have equality of access, opportunity, and outcome

The Equality Act 2010 sets out a range of protected characteristics, and states that discrimination on the grounds of age, gender reassignment, race, disability, marriage and civil partnership, pregnancy, maternity, Paternity, religion or belief, sex or sexual orientation will not be tolerated. The Skills Centre wholeheartedly endorses this view and works to enable equality and diversity through a range of direct actions.

The Skills Centre Limited encourage all stakeholders to be themselves and respect who they are whilst conducting themselves in a manner that respects others and the law.

In all its activities The Skills Centre will:

- Foster the principles of the Equality Act 2010
- Foster the principles of the PSED as a body carrying out a public function
- Fostering good relations (tackling prejudice and promoting understanding between people who share a protected characteristic and others)
- Ensure individuals' and groups' protected characteristics are respected
- Make society fairer through talking discrimination and providing equality of opportunity for all those with a stake in our services
- Remove or minimise disadvantages suffered by people due to protected characteristics
- Meet the needs of people with protected characteristics
- Encourage people with protected characteristics to participate in work, public life and other activities where their participation is low
- Take proportionate actions when applying and complying with the our Equality Duty

## **Discrimination**

The Equality Act 2010 prohibits discrimination because of certain protected characteristics. These are:

- disability;
- sex;
- gender reassignment;
- marital or civil partnership status;
- race;

- religion or belief;
- sexual orientation;
- age; and
- pregnancy or maternity.

Discrimination can be intentional or unintentional and may occur directly, indirectly, by association, or by perception (see Different types of discrimination under the Equality Act 2010).

There are also two specific types of discrimination that apply only to disability: "discrimination arising from disability" and "failing to make reasonable adjustments" (see Different types of discrimination under the Equality Act 2010).

Discrimination is not always obvious and can be subtle and unconscious. This stems from a person's general assumptions about the abilities, interests and characteristics of a particular group that influences how they treat those people (known as "unconscious bias"). Such assumptions or prejudices may cause them to apply requirements or conditions that put those in particular groups at a disadvantage. Examples include:

- steering employees into particular types of work on the basis of stereotypical assumptions without considering the particular attributes and abilities of individuals;
- recruiting or promoting individuals into particular roles because of assumptions about the reactions or preferences of other employees or clients; and
- using different standards for different groups of employees to judge performance.

### **Different types of discrimination under the Equality Act 2010**

- **Direct discrimination:** Treating someone less favourably because of a protected characteristic compared with someone who does not have that characteristic (for example choosing not to recruit someone because they are disabled and you think they "wouldn't fit in" to the team).
- **Indirect discrimination:** Where a policy, procedure or way of working that applies to everyone puts people with a particular protected characteristic at a disadvantage, compared with people who do not have that characteristic, unless there is a good reason to justify it. An example is introducing a requirement for all staff to finish work at 6pm. It is arguable that female employees, who statistically bear the larger share of childcare responsibilities could be at a disadvantage if the new working hours prevent them from collecting their children from school or nursery.
- **Associative discrimination:** Treating someone less favourably because they are associated with someone who has a protected characteristic, for example because their partner is transgender.
- **Discrimination by perception:** Treating someone less favourably because you perceive them to have a protected characteristic even if they do not, for example choosing not to promote someone because you mistakenly perceive them to be gay.
- **Discrimination arising from disability:** Treating someone unfavourably because of something connected with that person's disability and where such treatment is not justified. Examples include:
  - dismissing or failing to pay a bonus to someone because of their disability-related absence; or

- disciplining someone for losing their temper where such loss of temper was out of character and was due to severe pain caused by them having cancer.
- **Failing to make reasonable adjustments:** Employers are legally obliged to make reasonable adjustments to ensure that aspects of employment, or the employer's premises, do not put a disabled person at a substantial disadvantage. Failing to comply with this duty is unlawful. Examples of reasonable adjustments might include:
  - allocating some of the disabled person's duties to a colleague;
  - changing their working hours or place of work;
  - adjusting procedures for assessing job candidates; and
  - modifying disciplinary and grievance procedures.

### **Harassment and sexual harassment**

Harassment is unwanted conduct related to a protected characteristic that has the purpose or effect of:

- violating someone else's dignity; or
- creating an intimidating, hostile, degrading, humiliating or offensive environment for someone else.

Sexual harassment is:

- conduct of a sexual nature that has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment; and
- less favourable treatment related to sex or gender reassignment that occurs because of a rejection of, or submission to, sexual conduct.

You should refer to our Anti-harassment and anti-bullying policy for further information on our procedure for reporting harassment.

### **Victimisation**

Victimisation is treating another person detrimentally either because that person has made a complaint of discrimination or harassment, or because they have supported someone else who has made such a complaint, for example by giving a witness statement that supports the allegations.

### **Bullying**

There is no legal definition of bullying. However, we regard it as conduct that is offensive, intimidating, malicious, insulting, or an abuse or misuse of power, and usually persistent, that has the effect of undermining, humiliating or injuring the recipient.

Bullying can be physical, verbal or non-verbal conduct. It is not necessarily face to face and can be done by email, phone calls, online or on social media. Bullying may occur at work or outside work.

If the bullying relates to a person's protected characteristic, it may also constitute harassment and, therefore, will be unlawful (see Harassment).

You should refer to our Anti-Bullying and Harassment policy for further information on our procedure for reporting bullying.

## **Learners and Apprentices**

The Skills Centre Limited understands the environment our learners and apprentices work in and the social taboos that have been associated with that environment over the years. The Skills Centre Limited encourage all learners and apprentices to conduct themselves and behave in a way that they would expect someone to behave if welcomed into their home. Learners and apprentices are reminded that respect between learners and apprentices and colleagues in the working environment is not only legal standing but also contributes to a much more successful and happier place.

The Skills Centre Limited will ensure that:

- Equality of opportunity is embedded in all policies, practices, decision- making and evaluation processes
- That all employees receive the appropriate training
- Our learners and apprentices are provided with the appropriate guidance and support to understand the policies, practices, decision-making and evaluation processes and who to contact for support if needed

- Flexible opportunities are offered which meet learners' and apprentices' needs and enable all learners and apprentices to realise their potential
- Positive images of achievement from all sections of society are recognised and celebrated
- We actively promote access to learning programmes and services for all our learners and potential clients to enable them to improve their skills, to make progress and be successful in realising their ambitions
- We create a visibly diverse and inclusive environment, which values and celebrates difference and raises the aspiration of existing and potential learners
- We provide services which are effective in recognising and assessing the specific needs of individuals and in ensuring that the right kinds of support and interventions are provided to meet these needs
- Tackle discrimination, whether direct or indirect

## **Employees**

It is the responsibility of all employees to understand, adhere to, promote and foster the ethos outlined within this policy to enhance the beneficial effects of operation. Although all departments have their own responsibilities, commitment of everyone to work as part of a team is one of the strengths on which The Skills Centre Ltd is founded.

All new employees will be inducted in the content contained within this policy and the open ethos of the organisation. It is the responsibility of all departmental managers to ensure employees, contractors and delivery partners for whom they are responsible, understand any new or amended policies and the contents are communicated by them and adhered to.

## **Monitoring and Reporting**

The Directors, Managers and Head of Human Resources will monitor the effectiveness of the Policies which may be changed from time to time to:

1. Ensure they are effective and
2. Comply with current Legislation

This monitoring will include measuring and reporting learners' access and outcomes by appropriate characteristic (usually the diversity groups set by external funders). This will be undertaken minimum annually. Staff recruitment processes and procurement processes will have responses and appointments measured by protected characteristics, and these will be reported at the end of each process.

## **Sub-Contractors and Delivery Partners**

Sub-contractors and partners delivering services and goods on behalf of The Skills Centre Ltd will be issued a copy of this Equality and Diversity Policy. When sub-contractors or external providers are delivering on our behalf they will be subject to review and monitoring of delivery including by funder-set diversity metrics. We expect that all external providers adhere to the guidance outlined within this policy and any legislative requirements at all times and report any issues immediately to their contract lead. Equality and diversity requirements form part of all contracts or service level agreements for those with learner contact.

Should an external provider fail to adhere to the guidance outlined within this policy then the right to work for or on behalf of The Skills Centre Ltd may be revoked, in the worst case. Each case will be investigated and judged on its own merit with the following remedial action/s or sanctions imposed:

- Suspension (removal of work for defined period)
- Curtailment (restrictions or conditions imposed on continued work)
- Revocation (removal of right to contract to The Skills Centre Ltd)

## **Inclusiveness**

The Skills Centre Ltd board and management are responsible for ensuring that they are aware of, and meet, their statutory responsibilities. All appropriate stakeholders are made aware of and expected to behave in a way that is consistent with this Equality and Diversity Policy. The policy is promoted through ensuring all staff and learners are provided with a copy and sign up to it at induction, and receive such refresher training as they need when it is identified through our quality and assessment processes. All learners and staff receive a training session on equality and diversity after induction.

## **Age**

The Skills Centre Ltd will:

- Not tolerate discrimination on the grounds of age
- Monitor, report on and rectify any issues on the admission and progress of all learners and apprentices, and staff appointments and progression, by age group
- Help minimise age stereotyping in the site environment

## **Gender Reassignment Commitment**

The Skills Centre Ltd will:

- Not tolerate discrimination on the grounds of gender re-assignment towards trans-gender or transsexual people
- Monitor, report on and rectify any issues on the admission and progress of all learners and apprentices, and staff appointments and progression, by gender reassignment group
- Help minimise gender reassignment stereotyping in the site environment

### **Race and Ethnicity Commitment**

The Skills Centre Ltd will:

- Actively tackle racial discrimination among staff, delivery partners, learners and apprentices
- Always clearly explain race and ethnicity eligibility guidelines from the funding or government bodies
- Monitor, report on and rectify any issues on the admission and progress of all learners and apprentices, and staff appointments and progression, by racial and/or ethnic group
- Help minimise race and ethnicity stereotyping in the site environment

### **Disability Commitment**

The Skills Centre Ltd will ensure all those with disabilities have access to:

- Appropriate opportunities to disclose disability and/or learning difficulties
- Equal opportunities to prospective employment opportunities
- Specialist equipment and technology to aid them
- Information in relevant formats

We will work to minimise disability stereotyping in the site environment and promote ability first, and monitor, report on and rectify any issues on the admission and progress of all learners and apprentices, and staff appointments and progression, by disability group.

We will implement the Disability Discrimination Act, making reasonable adjustments to ensure staff and learners are enabled to access work and support and thrive.

### **Marriage and Civil Partnership**



The Skills Centre Ltd will:

- Not tolerate discrimination on the grounds of Marriage or Civil Partnership
- Monitor, report on and rectify any issues on the admission and progress of all learners and apprentices, and staff appointments and progression, against marriage and civil partnership group

### **Pregnancy and Maternity**

The Skills Centre Ltd will:

- Not tolerate discrimination on the grounds of Pregnancy and Maternity
- If a break in studies is required, The Skills Centre will revise the dates in the apprenticeship agreement and take account for the duration of the break.
- Provide facilities that are suitable
- Monitor, report on and rectify any issues on the admission and progress of all learners and apprentices, and staff appointments and progression, against pregnancy

### **Religious Belief Commitment**

The Skills Centre Ltd will:

- Not discriminate due to religion or belief
- Not discriminate indirectly by applying criterion, provision or practice which disadvantages anyone due to their religion or belief
- Not victimise anyone because they have made or are going to make a complaint of discrimination on the grounds of religion or belief
- Promote the Prevent strategy
- Help minimise religious stereotyping in the site environment
- Monitor, report on and rectify any issues on the admission and progress of all learners and apprentices, and staff appointments and progression, by religious group

### **Gender and Sex Commitment**

The Skills Centre Ltd will:

- Strongly oppose discrimination on the grounds of sex
- Monitor, report on and rectify any issues on the admission and progress of all learners and apprentices, and staff appointments and progression, by gender/sex

- Help minimise sex stereotyping in the site environment

### **Sexual Orientation Commitment**

The Skills Centre Ltd will:

- Strongly oppose discrimination on the grounds of sexuality and are committed to remove discrimination from all areas of the learners and apprentices working environment
- Encourage positive acceptance of all gender identities and gender expressions
- Not tolerate gender or sexuality identification harassment in any area of the learners' and apprentices' working environment
- Help minimise sexual orientation stereotyping in the site environment
- Monitor, report on and rectify any issues on the admission and progress of all learners and apprentices, and staff appointments and progression, by sexual orientations

### **Fair Recruitment and Assessment**

The Skills Centre Ltd will, as part of its Equality and Diversity policy, ensure that all assessments and assessment activities undertaken by staff, sub-contractors, delivery partners, learners and apprentices are:

- Reliable
- Valid
- Transparent
- Recognise and respect equality and diversity
- Use appropriate language and documentation that is accessible to all relevant stakeholders
- Use a variety of assessment strategies

The Skills Centre Ltd will ensure that feedback is given to every learner when they achieve certain milestones during their learning programme, such as passing a unit or achieving an element of a framework. Two-way feedback is encouraged amongst all staff, delivery partners, learners and apprentices to adopt strong lines of communication and facilitate 360-degree improvement.

Fair recruitment is also prioritised, with our Recruitment Strategy including targets for each excluded group which meet or exceed representation in the communities we

serve. Activities are focused on specific community and representative groups and support is provided to ensure recruitment and retention meet targets.

Staff recruitment is similarly-focused, and The Skills Centre Ltd will prioritise fair recruitment of staff, recognising the value of role models for learners and the importance of the staff team representing the same communities as learners.

## **Training**

The Skills Centre Ltd are committed to providing training for staff to ensure they embed Equality and Diversity in all policies, practices, decision-making and evaluation processes. The Skills Centre Ltd will implement a range of learning and development opportunities throughout the employment cycle.

### **Career development**

Any decision you make relating to a person's promotion or career development must be free from discrimination.

We ensure that selection criteria and processes for recruitment and promotion are reviewed on a regular basis so that there is no discriminatory impact on a certain group.

We continue to improve the diversity of our workforce, for example by:

- Local job recruitment connected to centres and offices.
- Job opportunities for learners where appropriate.
- running a return-to-work programme for those returning from family-related or disability-related long-term leave.

## **Disability inclusion**

### **Recruiting people with a disability**

The recruitment team will consider disability in advance of a recruitment campaign so that advertising, application forms and assessments, arrangements for interviews, job descriptions and employee specifications, and selection criteria are appropriate and as inclusive as possible.

We will ask applicants at the outset if they require any reasonable adjustments to be made to the recruitment process. These may include ensuring easy access to the premises for an interview.

If you are involved in the interview process, you must not ask job applicants about their health or disability.

### **Talking about disability**

We understand that some people find it hard to discuss their disabilities and that disability can be invisible.

Psychological safety, where people feel able to speak up about their experiences without fear of negative consequences, is paramount to ensuring disability inclusion.

However, this is only possible if we treat people with dignity, trust and respect and we expect everyone to uphold these values.

We do not tolerate ableist language in our organisation. Ableist language is language that is

negative, inappropriate or offensive towards people with a disability and may take the form of jokes or "banter". If you adopt such language, we will take action against you including (for those to whom it applies) under our [Disciplinary procedure](#).

### **Reasonable adjustments**

If you have a disability, you do not have to tell us. However, we would encourage you to let us know so that we can support you, for example by making reasonable adjustments to our premises or to aspects of your role, or to our working practices.

If you are experiencing difficulties at work because of your disability, please contact your line manager or the HR team to discuss potential reasonable adjustments that may alleviate or minimise such difficulties. We may need to discuss your needs with you and your medical adviser to help us get the right support in place.

For colleagues who are returning from long-term disability-related absence, we have a return-to-work support programme in place. For further information, please contact the HR team.

### **Support**

If you have a disability, or you care for someone with a disability, and need emotional support or help with practical issues, please contact our employee assistance programme for free, confidential advice. Details of how to access this service are on our intranet.

If you wish to create a support or work group to speak please contact HR department.

### **Accessibility**

Accessibility tours enable our organisation to gain a better insight into accessibility issues from the perspective of the person with a disability. If you experience accessibility issues due to your disability, for example because of aspects of our premises or because you do not have adaptive equipment to help you perform your role, please contact the HR team to arrange an accessibility tour.

### **Monitoring and Evaluation**

Corporate monitoring of the policy will be the responsibility of the Director and Head of Human Resources. This will include:

- Annual review of the policy
- An Annual EDI Report
- Learner and staff surveys
- Data analysis
- Monitoring of formal complaints
- Collecting and disseminating examples of good practice
- Self Assessment Report and Quality Improvement Plan

**Implementation Action Plan Owner:**

Matt Climer

**Date:** 1<sup>st</sup> April 2023

**Review:** 10<sup>th</sup> November 2025

**Action 1:** *To ensure all staff and subcontractor partners are made aware of this policy and understand their role and responsibilities regarding Equality & Diversity within their work/training practices.*

Activities: Communicate awareness through training and check understanding of the contents of this policy with clients, staff and partners, providing further information and guidance as required.

Impact: Implementation of a policy management system for all policies and procedures. Greater awareness and contribution to Equality & Diversity. All staff are aware of this policy and understand their role and responsibilities. New staff / sub-contractors / partners will be made aware at engagement / induction. Implementation of a company internal system for all policies and procedures.

Lead: Head of HR

Progress: Annual Implementation

**Action 2:** *Ensure learners understand the importance of Equality and Diversity Policy and actions to be covered in learner, new staff, Sub-Contractor and Delivery Partner induction. Greater awareness and contribution to Equality & Diversity.*

Activities: To be delivered within the induction of all clients, new staff, learner, contractors and/or delivery partners. With a scanned record kept by The Skills Centre Ltd as and when they are utilised. To provide training on respect for all within each ESF course and gain learner agreement to adhering to the respect policy.

Impact: All learners are aware of this policy and understand their role and responsibilities. New learners will be made aware at engagement / induction.

Lead: Operational Director and Head of Quality, tutors, work coaches and key worker

Progress: Included in the Annual Quality Calander

**Action 3:** *Monitoring of clients, new staff, learner, contractors and/or delivery partners.*

Activities: Monitoring the aforementioned at the prescribed intervals to include feedback on equality positives and negatives identified by observer.

Impact: Improved service to all. A basis for improvement activities. Lead:  
Operational Director

Progress: Included in the Annual Quality Calander

**Action 4:** *Staff Monitoring*

Activities: Equality and Diversity monitoring questionnaires distributed to staff. Impact:  
Overview information of staff diversity in place.

Lead: Head of HR

Progress: Annual Staff Survey and monitoring through HR systems

**Action 5:** *Gender and ethnicity pay gap measurement*

Activities: Positive Recruitment. Gender and ethnicity pay gap information measured and positive action taken to close gap.

Impact: HR policies outlined in full within the The Skills Centre policies including on minimising bias. Corrective actions taken including targeting management-level recruitment at relevant groups.

Lead: Head of HR

Progress: Reviewed annually, reported internally

**Action 6:** *Employee Engagement Meetings, Managers Meetings, Board Meetings.*

**Activities:** Equality, Diversity and Inclusion to be included on the agenda of future management and team meetings at all levels to ensure appropriate communication of information and resolution of issues.

**Impact:** Dissemination of information which will highlight positives and/or negatives which will steer future publicity and campaigns to provide transparency on equality, diversity and inclusion and drive improvement.

**Lead:** Operational Director

**Progress:** EDI is included on the agenda of all Management / Engagement, Steering Group and Board meetings and minutes held on a secure server.

**Action 7: Accessibility**

**Activities:** Through the use of community-based training locations the training will come to the clients. This will negate the need for them to travel to locations which may not be accessible to them. Greening London Construction ESF is delivered from seven locations across London.

**Lead:** Operational Director

**Impact:** A more diverse range of clients, delivery partners may be utilised and progressed through training, enabling the meeting of funders' diversity targets.

**Progress:** Some community facilities identified and delivered through. Not all activities are suitable for delivery off-site due to need for simulated environments and health and safety standards.

**Action 8: Staff Training**

**Activities:** Staff training day to cover Equality, Diversity and Inclusion, including for new staff recruited.

**Lead:** Head of HR

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**Impact:** Greater awareness and contribution to Equality, Diversity and Inclusion issues including possible causes and outcomes.

**Progress:** Delivered annually