

## POL-QUA-0012

### Equity, Diversity & Inclusion Policy

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| POL-QUA-0012     | V3      | Lisa Simpson | June 2025        |

|                                                                                                                       |                                           |
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#### Distribution

All Futures employees, volunteers and apprentices, subcontractors, grant recipients and customers.

Related Policies

| Version  | Date     | Author | Author's job Title | Changes                                             |
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| 2019 V2  | 11/6/19  | TF     |                    | Reviewed by Policy lead, volunteers added to policy |
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| 2022, v1 | 07/07/22 | KO     |                    | Annual policy review                                |
| 2022, v2 | 22/11/22 | LS     |                    | 8.3 section added                                   |

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| 2023 V1 | 10/5/23   | TH             | Governance Administrator | Transferred to new template. Interactive contents page added |
| 2023,V2 | July 2023 | Lisa Simpson   |                          |                                                              |
| 2024 V3 | June 2024 | Karenza Morgan |                          | Review and update                                            |

For Information: Where we refer to as ‘Futures’ in this policy – we are referencing a group of companies made up of Futures Advice, Skills & employment Ltd and Nottingham & Nottinghamshire Youth Support Ltd

To keep things simple throughout this document, ‘we’ and ‘us’ means the Group Companies and its associated brands. This policy applies across all companies within the Group.

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## 1 Policy Context/Statement

Futures is committed to supporting, developing, and promoting equity, diversity, and inclusion in all its employment practices and activities and aims to establish an inclusive culture free from discrimination and based on the values of fairness, dignity and respect as defined in the Equality Act 2010 and 2012 and Public Sector Equality Duty 2011.

Futures will ensure that all staff and customers (i.e., young people, adults, learners, schools, and employers), subcontractors, stakeholders, employees, volunteers, and apprentices understand that they are entitled to be treated fairly with equity and will take stringent steps to ensure this is adhered to. See the equity, diversity, and inclusion strategy for further information on our commitment and intention.

## 2 Overall Aims and Objectives:

The aim of this policy is to provide a commitment by Futures to:

- 2.1 Promote Equity, Diversity and Inclusion as defined in the Equality Act 2010 based on protected characteristics of:
  - a. age
  - b. disability (physical or mental impairment)
  - c. gender reassignment
  - d. marriage and civil partnership,
  - e. pregnancy and maternity
  - f. race (including colour, nationality, and ethnic or national origin),
  - g. religion or belief
  - h. sex (gender)
  - i. sexual orientation.
  
- 2.2. Oppose and avoid all forms of unlawful discrimination relating to terms and conditions of employment such as:
  - a. pay and benefits
  - b. employment status (permanent v fixed term)
  - c. working hours (part-time, job share)
  - d. terms and conditions of employment
  - e. handling grievances and discipline
  - f. dismissal
  - g. redundancy
  - h. leave for parents

- i. requests for flexible working
  - j. recruitment & selection for employment and promotion
  - k. support for training or other developmental opportunities.
- 2.3 Provide equity, fairness, and respect for all in our customers, whether temporary, part-time, or full-time.
- 2.4 We are also committed to understanding our customer profile to deliver services which reflect the specific needs of all our customers to promote equity and support diversity and inclusion.
- 2.5 We will continue to take positive action to address any under representation in the customer profile, and to tackle any gaps in the success, retention, or achievement rates for any equality group. We will also work to eliminate any barriers that might inhibit the success or progression of any groups of customers.
- 2.6 Futures is also committed to complying with the Public Sector Equality Duty to:
- a. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
  - b. Advance equity of opportunity between people who share a protected characteristic and those who don't.
  - c. Foster good relations between people who share a protected characteristic and those who don't.
- 2.7 We will achieve our aims by:
- a. Consulting employees, volunteers, trade unions, customers, and stakeholders about how our services and employment practices could be improved.
  - b. Creating an environment which individual differences and contributions of all are recognised and valued.
  - c. Promoting equity, diversity and inclusion in the workplace, which Futures believes, is good management practice and makes sound business sense.
  - d. Creating a working and learning environment free of bullying, harassment, victimisation, and unlawful discrimination, promoting dignity and respect for employees, customers, stakeholders, subcontractors, and visitors.
  - e. Encouraging anyone who feels they have been subject to discrimination to raise their concerns so corrective measures can be applied.
  - f. To make opportunities for training, development, and progress available to all employees, volunteers, and customers, who will be helped and encouraged to develop their full potential and thrive.
  - g. Review employment practices and procedures when necessary to ensure fairness and conduct equity impact assessments.
  - h. Review practices and procedures when necessary to ensure fairness and update them and the policy to take account of changes in the law.

- i. Ensure that disabled employees, volunteers, customers, and those applying to join Futures are not just 'included' but actively supported and promoted to fulfill their aspirations.
- j. All participants in the educational process will be made aware that they have a legal and moral responsibility to eliminate discrimination and harassment and to promote equity of opportunity and good relations between people from different backgrounds and communities, and between different equality groups.
- k. Exemplify British Values in everything we do i.e. Democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs.
- l. Identify priorities, set equity objectives, and regularly review impact – our Equity, Diversity and Inclusion Impact Plan, with a view to monitoring progress in representation and performance of the individual protected characteristic groups.
- m. Meet specific equality and diversity contract requirements. Where required, act on external equality and diversity compliance audits

### 3 Understanding Definitions

- 3.1. **Equal opportunities** is a principle that emphasises that opportunities in employment, education and other areas are available to all irrespective of background or identity.
- 3.2. **Equity and Equality** provides fairness. Equality achieves this by treated everyone the same, whereas Equity achieves this by treating people differently based on individual needs to provide a level playing field.
- 3.3. **Diversity**. Everyone is different, and diversity is about recognising, respecting, and valuing the differences we each bring to work.
- 3.4. **Inclusion**. Inclusion refers to an individual's experience and the extent to which they feel valued and included irrespective of their background or identify be that at work or in society.
- 3.5. A person has a disability if they have a physical or mental impairment, and the impairment has a substantial and long-term adverse effect on their ability to perform normal day-to-day activities.
- 3.6. Direct discrimination: this is treating someone less favourably (or, in the case of pregnancy and maternity, unfavourably) because of a protected characteristic. It also includes less favourable treatment because someone is associated with another person who has a protected characteristic.
- 3.7. Indirect discrimination: this is treating a group of people in the same way, but in a way which adversely affects those with a protected characteristic.
- 3.8. Victimisation: this is treating someone less favourably because they have alleged discrimination or asserted their right not to be discriminated against because of a protected characteristic.
- 3.9. Harassment: this is unwanted conduct, related to a protected characteristic, which has the purpose or effect of creating an intimidating, hostile, degrading, humiliating or offensive environment for someone or violating their dignity. Harassment may also be of a sexual nature. It may also occur

where someone harasses the victim, the victim either rejects or submits to the harassment and, because of that rejection or submission, that person then treats the victim less favourably.

## 4 Roles, Responsibilities and Structure

### 4.1 Specific responsibilities of Management

- 4.1.1. The **Chief Executive** is ultimately accountable for ensuring that all Futures business and employment practices are compliant with Equality legislation.
- 4.1.2. Through the **Executive EDI Group**, the Board lead and Executive leaders play a key role in ensuring that Equity, Diversity, and Inclusion is an integral part of Futures strategy and business planning.
- 4.1.3. Futures will monitor how well equity of opportunity is promoted, and discrimination tackled, through all its quality assurance and self-assessment processes.

### 4.2. Directors and Managers will:

- a. Ensure that their own behaviour and those of the employees, volunteers, customers, and apprentices they manage or engage with complies in full with this policy.
- b. Ensure that all employees, volunteers, customers, and apprentices receive the appropriate equality, diversity and inclusion training.
- c. Investigate all matters of alleged bullying, discrimination, victimisation, harassment, and inappropriate behaviour promptly and thoroughly.
- d. Ensure that Futures recruitment, selection and appointment procedures, performance management processes, staff development opportunities and disciplinary and grievance processes are fairly and consistently applied to all staff.
- e. Ensure that all employees, volunteers, customers, and apprentices understand they, as well as their employer, can be held liable for acts of bullying, harassment, victimisation, and unlawful discrimination, in the course of their employment, against fellow employees, customers, suppliers, learners and the public.
- f. Directors and individual managers will regularly monitor the success, retention rates and attendance rates of customers from different equality groups and will take action to address any gaps. Futures will constantly review its provision and support services to ensure they are designed to take into account the specific needs of all equality groups.
- g. Futures will work to ensure that there is no discrimination of any kind in relation to the recruitment and admission of customers to courses or training.
- h. Recruitment patterns across curriculum areas for all equality groups will be reviewed and positive action taken to address any under-representation.

- i. Publicity material will, where practical, reflect the diversity of all communities, and will be free from bias.

#### **4.3. Responsibilities of all employees**

Futures expects all employees, volunteers, and apprentices to act in accordance with this policy, in particular, all member of staff should:

- a. Comply with the policy and undertake appropriate equality, diversity and inclusion training.
- b. Not bully, victimise, harass, discriminate, or intimidate other employees, apprentices, volunteers, customers, or subcontractors who have or are perceived to have one of the protected characteristics.
- c. Ensure no individual is discriminated against or harassed because of their association with another individual who has a protected characteristic.
- d. Treat everyone with dignity and respect.
- e. Inform their manager if they become aware of any discriminatory practice.

#### **4.4. Responsibilities of all customers**

Futures expects all customers to act in accordance with this Policy. To include:

- a. Compliance with this policy and to behave in line with our code of conduct.
- b. Not bully, victimise, harass, discriminate, or intimidate other customers, employees, apprentices, volunteers who have or are perceived to have one of the protected characteristics.
- c. Ensure no individual is discriminated against or harassed because of their association with another individual who has a protected characteristic.
- d. Treat everyone with dignity and respect.
- e. Inform their tutor, skills coach, or adviser if they become aware of any discriminatory practice.

#### **4.5. Responsibilities of Subcontractors and Grant recipients**

It is a contractual requirement of all subcontractors and grant recipients that they comply with all current legislation (Equality Act 2010 and 2012 and Public Sector Equality Duty April 2011) in employment and in the provision of education and training. Subcontractors and grant recipients must ensure compliance by providing an up-to-date copy of their Equality and Diversity Policy.

Subcontractors and grant recipients must meet relevant Equity, Diversity and Inclusion objectives which are built into quarterly reviews. Futures will support subcontractors and grant recipients to meet and add value to the contract by sharing of best practice and ongoing continuous professional development relating to Equity, Diversity, and Inclusion.

## **5 Procedures:**

### **5.1. Grievance and Disciplinary**

- a. Employees and volunteers, have the right to pursue a complaint concerning discrimination, bullying or victimisation via Futures Grievance Procedures.
- b. Discrimination, bullying and victimisation will be treated as disciplinary offences and they will be dealt with under Futures Disciplinary Procedure.
- c. Proven allegations will result in disciplinary action.
- d. Particularly serious complaints could amount to gross misconduct and lead to dismissal without notice.
- e. Customers have the right to make a complaint by following the Customer Complaint Procedures.
- f. Proven allegations for customers will result in the possible withdrawal of service and for subcontractors/grant recipients, possible termination of contract.

### **5.2 Harassment and Bullying**

- a. Futures will ensure that all employees and customers are aware of the policies and processes for reporting harassment and bullying through induction and tutorials, and this information will be available in all major publications, and on the intranet.
- b. Support will be provided for any employees, and customers who are victims of harassment or any other form of bullying.
- c. All complaints of bullying and harassment will be recorded and dealt with through the Harassment and Bullying Policy where it states staff report complaints to the line manager. Customers should report to tutor/coach/adviser or Safeguarding Officer.

## **6 Related training and continuous professional development**

- 6.1 All employees and volunteers will receive training on Equity, Diversity, Inclusion and British Values on an ongoing basis and will be made aware of this policy as part of their company induction programme as well as completing mandatory Equity, Diversity, Inclusion training within the first 4 weeks of employment.
- 6.2 Employees will be responsible for identifying their continuous professional development (CPD) needs through the performance management process, team meetings and using Equity, Diversity and Inclusion resources on Futures intranet. Any company level training needs identified for all staff will be planned through the People & Culture team to ensure staff are regularly kept up to date.
- 6.3 **The Curriculum, Assessment, Learning and Teaching**
  - a. It is the legal and ethical responsibility of all staff to conduct their teaching and learning activities in a non-discriminatory manner, and this is reinforced in the requirements of the Education Inspection Framework.

- b. Staff will ensure curriculum content will help customers to recognise the rights and responsibilities of themselves and others in relation to these issues
- c. The outcomes of any assessment processes will be regularly monitored to ensure that they do not indirectly discriminate against any particular group of customers.
- d. All tutors should use materials, resources and learning activities that are free from discriminatory assumptions, images and language, challenge stereotypes, are sensitive to diversity and promote equity of opportunity.
- e. Futures will offer learning support in English and maths for all customers who are identified as requiring it; support for customers whose first language is not English; and appropriate additional support for any disabled customers.
- f. A range of inclusive activities will be developed, that promote the good relations between customers from different backgrounds, and support community cohesion.

## 7 Policy Monitoring and Evaluation

- 7.1 Futures is fully committed to making the principle of Equity, Diversity, and Inclusion a reality and ensure that it is embedded into all our practices by setting targets that actively promote Equity, Diversity, Inclusion and tackle discrimination. To achieve this, we have in place an Equity, Diversity, and Inclusion Impact Plan that supports this policy. The Equity and Diversity Impact Plan will be **reviewed every 6 months with the Leadership team and Board** to review progress, measure impact, and implement improvements.
- 7.2 Futures will monitor the effectiveness of this policy to ensure it is achieving its objectives. Within Futures, as part of this process, we monitor:
- a. The composition of job applicants and decisions in recruitment and promotions
  - b. The makeup of our workforce regarding information such as age, gender, ethnic background, sexual orientation and disability
  - c. Access to training, promotion and other opportunities and benefits
  - d. The impact of our employment policies, including use of the disciplinary and grievance procedure
  - e. Dismissals and other terminations
  - f. Customer data will also be reviewed to ensure fairness and equity in terms of service provision and positive outcomes.
  - g. Information collected for monitoring purposes will be treated as confidential and will not be used for any other purpose.

## 8 List of related strategies, policies, and procedures

This policy should be read in conjunction with the following:

List of related policies, and procedures (all located in the [Policy Section of the intranet](#))

- a. Equity, Diversity and Inclusion Impact plan
- b. Guidelines for supporting customers with additional needs
- c. Safeguarding strategy, policy, and Impact plans
- d. Disciplinary procedure
- e. Grievance procedure
- f. Harassment and bullying policy
- g. Recruitment and Selection procedures
- h. Malpractice policy

## 9 Annex 1

### Positive about Disability

The Company has shown its commitment to take positive steps to ensure that staff with disabilities are able to use their abilities more effectively within the organisation. In accepting the 'Disability Confident' award we have committed our Company to the following:

- a. to interview all applicants with a disability who meet the minimum criteria for a job vacancy and consider them on their abilities.
- b. to ask disabled employees at least once a year what we can do to make sure that they can develop and use their abilities at work.
- c. to make every effort when employees become disabled to make sure that they stay in employment.
- d. to take action to ensure that key employees develop the awareness of disability needed to make our commitments work.
- e. to review these commitments each year, plan ways to improve on them and let all our employees know about progress and future plans.

### Access to Fair and Reasonable Adjustments

Futures has the responsibility to ensure that the rights of individual customers to access qualifications and assessment in a way most appropriate for their individual needs are upheld. A Reasonable Adjustment is any action that helps to reduce the effect of a disability or difficulty that places the customers at a substantial disadvantage in an assessment situation.

Futures will consider on a case-by-case basis whether reasonable adjustments are necessary and what reasonable adjustments will be effective. What is reasonable will depend on factors such as the individual customers' circumstances, cost implications, the practicality and effectiveness of the adjustment and Awarding Organisation requirements in order for competence to be evidenced.

An adjustment must not give the customers an unfair advantage over others. The evidence produced by the customers as a result of reasonable adjustments being made must be assessable and verifiable and meet the requirements of the qualification regardless of the process or method used. Where an alternative assessment method is used as a means of providing evidence, the method must have equal rigor to those used for other customers.

All customers will be required to complete an Initial Assessment Questionnaire prior to registration which encourages customers to make any specific learning and/or support needs known to Futures. The need to ensure that Futures' staff are aware of any specific learning and/or support needs will be re-emphasized at induction.

Futures, in conjunction with the customer (and the Line Manager of the customer where appropriate), will decide whether he or she will be able to meet the requirements of the assessment or whether adjustments will be required. Judgments must be made on the basis of individual need. Any application for an adjustment to assessment must be supported by evidence that is valid, sufficient and reliable.

Futures will adopt a flexible approach in identifying alternative ways of achieving the assessment requirements and will contact the relevant awarding organisation and/or seek specialist advice to discuss

alternative arrangements that may be appropriate for specific situations where necessary. Once the customer's need has been identified and an adjustment agreed, the assessor will record this sensitively on the customer's schedule of learning and evidence record sheet for relevant unit/s.