



QUALITY MANAGEMENT SYSTEM POLICY

EQUALITY DIVERSITY AND INCLUSIVITY POLICY

The implementation of this particular Policy must always be carried out in conjunction with, and meet the requirements of the GDPR Policy.

QUALITY STATEMENT

“The **Engineering College** Quality Management System operates to support and guide staff, learners and employers in effective engagement with the services and products provided by the organisation, seeking to ensure a consistent and continuously improving quality experience to exceed the users’ expectations”.

Our Vision

“To inspire a new generation of Engineers.”

Our Mission

“Delivering outstanding technical training and assessment, connecting industry with education”

Our Values

“To act professionally with integrity and strive for excellence”

QUALITY CHAMPION – L Hendrick

DIVERSITY AND EQUAL OPPORTUNITIES

1. INTRODUCTION

This policy and plan describe the values and commitments of the Board and staff of The Engineering College who are resolved to fostering an inclusive culture which promotes equality, values diversity and maintains a working, learning and social environment in which the rights and dignity of all its staff and learners are respected. Those same values and commitments are required of all members of the College community, including:

- All members of staff including workers employed through temporary or freelance contracts or an agency staffing service, voluntary workers and interns as well as applicants for employment including offer holders
- Board members, honorary or associate members
- All trainees and learners and applicants for study including offer holders
- Contractors and third parties working at College or working on College's behalf including suppliers of goods and services
- Visitors including sponsoring employers, academic visitors from other institutions and external persons or agencies using College's premises, facilities or services.

We recognise that the broad range of experiences that a diverse staff and learner body brings, enhances our teaching and that in order for The Engineering College to remain a flagship supplier of engineering apprentices, we must continue to provide a diverse, inclusive, fair and open environment that allows everyone to grow and flourish.

2. THE LAW

This Policy intends to meet our duties under the Equality Act 2010.

[Equality Act 2010: guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/equality-act-2010)

The Equality Act 2010 provides the legal framework for most of our work. It consolidated and streamlined previous anti-discrimination legislation and made discrimination unlawful in respect of nine 'protected characteristics'. The characteristics provided under the Act are:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership (in respect of employment only)
- Pregnancy and maternity
- Race (including colour, nationality and ethnic or national origins)
- Religion or belief (including lack of belief)
- Sex
- Sexual orientation.

The Act also provides for positive action to be taken to help overcome disadvantage suffered by people who share a protected characteristic. This is not the same as positive discrimination (e.g., employing someone solely because they are female) which is illegal.

Rather than simply seeking to avoid discrimination, The Engineering College will ensure that, the board, staff, employer partners, contractors and throughout learner briefings, a requirement to comply with the relevant laws is made clear and will give consideration to how we could make a more positive contribution to the advancement of equality.

A common element of the law is a requirement to avoid the following:

- **Direct discrimination** – occurs when a person is treated less favourably than another because of a protected characteristic they have or are treated as though they had it because they associate with someone who has a protected characteristic
- **Indirect discrimination** – applying a general policy or practice which has the effect of disadvantaging a particular group of people, for example, one particular sex or racial group.
- **Discrimination by association** – occurs when a person is treated less favourably because they are linked or associated with a person who has a protected characteristic
- **Discrimination by perception** – occurs when a person is discriminated against because they are thought to have a particular protected characteristic (excluding pregnancy and maternity, and marriage and civil partnerships) or are treated as if they do. People are protected from this sort of discrimination even if someone who discriminates knows that the other person does not have the particular protected characteristic.
- **Age discrimination** – treating one person less favourably than others based on their age unless the practice is covered by an exception (e.g., under 18's) or good reason can be shown for the differential treatment i.e., objective justification
- **Disability discrimination** – treating one person less favourably because of their disability than others without a disability would be treated in the same circumstances.
- **Indirect disability discrimination** - where there is a rule, policy or practice which seems to apply equally to everyone, but which actually puts disabled people at an unfair disadvantage compared with people who aren't disabled.
- **Harassment** – uninvited behaviour related to a protected characteristic which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.
- **Bullying** – a form of physical or verbal harassment which involves an abuse of power or strength or position
- **Victimisation** – unfair discrimination directed against someone who has tried to assert or protect their rights, for example by making or supporting a complaint.

3. VALUES

The Engineering College believes that both work and learning require effective co-operation and teamwork, and that teams are strongest where their members have a range of skills, aptitudes, interests and backgrounds. Teams which are diverse are able to cope with the wide variety of challenges and opportunities in modern life and work. Differences may be of gender, ethnicity, ability, age, nationality, first language, religion, belief, sexuality, social background, culture, appearance, experience, or health. Irrespective of such differences, all people are of equal value and are equally deserving of respect and of the opportunity to develop their full potential.

Equality of opportunity does not mean that everybody is the same or should be treated in exactly the same way. It means that everyone should be respected for their own characteristics and abilities and that they should be treated in ways which make the best of those abilities. In practice this means that the Engineering College will work to ensure that, in its own premises and in those places where it has influence, respect, tolerance, thoughtfulness and goodwill will shape the behaviour of everyone. Their opposites – violence, rudeness, offensive names or 'jokes', harassment of individuals or small groups of people, bullying, the display of pornographic or racist material, ignoring or shunning people – are not acceptable and are likely to attract sanctions.

Achieving greater diversity and equality of opportunity is a practical matter, requiring careful thought, determined action and persistence. Success is measurable as it affects the wellbeing of every member of staff and every learner; in the quality of learning opportunities, both within the college and in the workplace.

4. COMMITMENTS

4.1 HARASSMENT AND BULLYING POLICY

This Policy is intended to help members of the Engineering College community to clearly understand the kinds of behaviour which might be regarded as harassment or bullying. 'Unwanted behaviour' can include any kind of behaviour, including spoken or written words or abuse, imagery, graffiti, physical gestures, facial expressions, mimicry, jokes, pranks, acts affecting a person's surroundings or other physical conduct.

What is considered unacceptable by society changes over time: so-called 'political correctness'. What is required is sensitivity to the position and concerns of other people and care to avoid unintended offence. These are reasonable expectations.

4.2 GENDER AND SEXUALITY

The College aims to create an inclusive culture, where all people are treated with dignity and respect. We promote gender equality:

- with a current priority to increase the proportion of women in academic roles and achieve strong representation and the voice of women in decision making at all levels
- by supporting and understanding the needs and experiences of the LGBT+ College community and work to change policy and practice to improve life for LGBT+ people
- by supporting and understanding those individuals who wish to take, or have taken, steps to change the gender identity they were assigned at birth. Our commitments are outlined in College's Transgender Policy.

The LGBT Foundation <https://lgbt.foundation> is a national charity delivering advice, support and information services to lesbian, gay, bisexual and trans (LGBT) communities.

Unacceptable behaviour may be directed towards all gender types. It may consist of unwelcome name-calling; 'jokes'; hostile attitudes towards particular groups of people that override consideration for the individual; suggestive, vulgar or sexually explicit language and pictures; or unwanted physical contact. Where someone makes it clear that they find language or behaviour objectionable, it should stop. Continuation may well be harassment or bullying.

Some examples of behaviour to avoid:

- Sexually suggestive comments and gestures
- Unnecessary physical contact
- Derogatory remarks about people of a particular gender or sexual orientation
- Unwelcome requests for social and sexual relationships
- Display or sharing of pornographic or sexually-revealing pictures
- Indecent exposure or sexual assault; these are likely to be criminal acts.

4.3 ETHNICITY

Racial abuse may include name-calling; 'jokes'; hostile attitudes towards groups of people that override consideration for the individual; language or behaviour which is known to be unacceptable to the culture of a person from a different ethnic background; and criticism of dress or appearance. In the United Kingdom, where British people come from a wide range of different ethnic groups, it is possible for a person from any background to give offence accidentally or through ignorance. When it is made clear that offence has been given the proper response is to stop and apologise.

Some examples of behaviour to avoid:

- Ridicule for physical or cultural difference
- Exclusion from the activities of the rest of the group, in learning or socially
- Unfair allocation of work or responsibility
- Racist comments, graffiti or wearing of insignia
- Unreasonable rejection of traditional dress
- Abuse, threats or attacks; these are likely to be criminal acts.

4.4 RELIGION

Religious sensibility is becoming a more prominent feature of life than it has been in this largely secular society. This applies to all religions. It is not illegal to challenge religious beliefs, but it may cause greater offence than was intended.

Some examples of behaviour to avoid:

- Teasing, or criticising unreasonably dress codes which may be important to believers in a particular religion
- Mocking other people's beliefs, particularly in front of a group or in public
- Acting on an assumption that people of a particular religion all have the same qualities or characteristics.

4.5 DISABILITY

The College is committed to fostering an inclusive culture which supports our disabled staff and learners to flourish. People with a wide range of disabilities are increasingly able to live a full life and work alongside able colleagues. The ability to learn and to enjoy appropriate learning support at The Engineering College is an essential foundation for that widening of opportunities. The help and encouragement of every member of The Engineering College community is an important part of that support.

Some examples of behaviour to avoid:

- Name-calling referring to a disability
- Exclusion from the activities of the rest of the group
- Unthinking assumption about what a person with disabilities can achieve or do
- Giving unwanted and uninvited help

The Engineering College will anticipate and regularly review what disabled people with a range of impairments (such as a visual impairment, a hearing impairment, a mobility impairment or a learning disability) might reasonably need to access its services or to obtain the same level of service as another person without the relevant protected characteristic.

5. POSITIVE ACTION

The positive action provisions of the Equality Act apply to College both as an employer and as an education provider. Where we reasonably think that people who share a protected characteristic: experience a disadvantage – we will enable or encourage those persons to

overcome or minimise that disadvantage; have needs that are different – we will meet those needs; or have disproportionately low participation in an activity – we will enable or encourage people to participate in that activity.

Positive action measures to encourage people from protected groups to apply for jobs and to help them make more competitive applications is set out in College's Recruitment Policy.

Anyone who feels that they are the victim of any form of harassment or bullying can be assured of a sympathetic hearing from the staff of The Engineering College. The simplest and sometimes the best response is to ask the person who has given offence to stop and for a simple apology to end the matter. That can be inappropriate where the offence is serious or repeated, despite clear indications that it is hurtful or offensive. It can also be impossible; where information technology has been used to harass or bully, for example. However the problem is to be tackled, act promptly, without waiting for it to become intolerable or to threaten wellbeing or health.

In the first instance:

- Ask the person involved to stop being offensive and for a simple apology to close the matter, or
- Approach a member of staff of the College and ask that they approach the offender on the victim's behalf, or
- Use the formal Complaints Procedure, referring to The Engineering College's Diversity and Equal Opportunities Policy and associated statements.

6. COMPLAINTS

The College regards any breach of this policy by any member of the College community as a serious matter to be dealt with through its agreed procedures. Anyone has the right to complain of behaviour that they believe is in breach of this policy even if it is not directed at them. The procedure for dealing with other concerns about breaches of the policy differ according to who is making the complaint as set out below:

Learners:

Including applicants for study and current learners - Safeguarding Manager

Employees:

- (i) Applicants for employment – who have reasonable grounds to believe that they have been unlawfully discriminated against on the basis of their protected characteristic(s) should refer any concerns in writing to the HR Manager or the chair of the selection panel, addressed to the contact specified in the relevant job advertisement in the first instance.
- (ii) Current staff complaints should be handed under the relevant policy/complaints' procedure.

Visiting staff, honorary/associate members, contractors, volunteers, third parties:

Discuss concerns with the relevant line manager in the first instance.

Members of the public:

Raise a complaint as provided on The Engineering College website.

Where people transgress, sanctions are laid down in a number of associated statements:

- Bullying & Harassment Policy
- Disciplinary Procedure
- Grievance Procedure
- Safeguarding Policy
- Transgender Policy
- Social Media Policy

- Learner selection
- Learner Handbook
- Use of information technology
- Complaints (of misconduct)
- Appeals (against learning outcomes)
- Contractor service-level agreement

7. RESPONSIBILITIES

Everyone who is part of, or associated with, the Engineering College community is personally responsible for actively promoting the values described in this policy.

The Board of Directors have accountability for championing, promoting and monitoring all aspects of equality, diversity and inclusivity.

The Chief Executive Officer is responsible for leading on this policy and working with the board to make sure compliance is met.

The Senior Team of the Engineering College:

- Approves and monitors diversity and equality targets annually
- Monitor improvements in diversity and equality over time
- Takes responsibility for safeguarding young people and vulnerable people
- Reflects on its own performance in diversity and equality matters.

Managers are responsible to make sure this policy is implemented in all work activities.

Every staff member, associate or volunteer has a duty under their contract of employment and code of conduct to comply with this policy. Apprentices and learners will have a duty to comply with this policy under the behaviour policy and learner code of conduct.

Intent:

- Ensure that recruitment, selection and enrolment procedures support equality and diversity in all aspects of education and employment.
- Equality of opportunity is achieved for staff in training, career development and recognition and rewards.
- Teaching, learning and support is planned, diverse and inclusive to meet the needs and circumstances of all learners.
- Curriculum content is diverse and educated through a variety of topics, set out at induction.

Implementation:

- Implementation of this policy will be reviewed regularly by the senior lead team
- Continuous training and updates will be available throughout the year to both staff and learners.
- Learner support team will provide continuous support throughout the apprentice and learners journey, protecting and providing confidentiality to sensitive matters around equality and diversity.
- HR Manager will provide ongoing support for all staff, providing confidentiality to sensitive matters around equality and diversity.
- Work within the community to promote a multi-cultural and diverse workforce and increase low presented areas.
- Marketing material will be inclusive and promote applications from all areas of the community.

Impact:

- Quality assurance cycle with capture impact on equality and diversity and continuously improve reflecting our performance annually in our SAR
- Statistical analysis of data capture from applicants, recruitment and achievements included in quality reports.

Stakeholders

The Engineering College will continue to work with employees, apprentices, external organisations and the community, this will support:

- Identifying barriers and make changes
- Increased satisfaction through collaboration and teamwork
- Promote and provide best practice to wider society.

Monitor and Review

The Engineering College will continuously monitor this policy through a variety of activities. A quality report will be produced quarterly to evaluate performance and feed back to the senior lead team and board of directors.

An annual self-assessment report (SAR) is produced and a Quality Improvement Plan (QIP) outlining key objectives to continuously improve. This is reviewed quarterly by management. This policy influences and works in conjunction with other strategies, policies and procedures and forms part of our continuous improvement cycle.

The Senior Leadership Team (SLT) will annually and regularly check this policy against performance and legislative or educational changes and update accordingly.

Footnote: The Engineering College recognises that the boundaries between freedom of expression and unlawful discrimination and harassment are not easily defined. However, helpful guidance has been published by the Equality & Human Rights Commission in the Freedom of Expression Legal Framework via <https://www.equalityhumanrights.com/en/publication-download/freedom-expression-legal-framework> .