

Equal Opportunities and Diversity Policy

Version		1.6	
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Approved by:		Senior Management Team	
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Distribution to		All	

Version	Review date	Next review Due	Comments	Reviewed by	Approved by
1.1		10.2.2016	Original version	Elaine Highwood	SMT
1.2	10.2.2016	10.2.2018	Update on circulation of the policy	Elaine Highwood	SMT
1.3	10.2.2018	10.2.2020	Adding of Action plan and Governance and Monitoring responsibilities	Elaine Highwood	SMT
1.4.1	13.6.2019	30.6.2020	Reviewed no changes made	Elaine Highwood	SMT
1.4.2	26.11.2020	26.11.2021	Reviewed – change made to the Action Plan	Elaine Highwood	SMT
1.4.3	30.3.2021	26.11.2021	Reviewed – change made to the Action Plan	Elaine Highwood	SMT
1.5	6.8.2021	6.8.2022	Adding of Cross Cutting themes and updating the Action Plan	Dr Cinzia Yates Elaine Highwood	EH /SMT
1.5.1	4.5.2022	4.8.2022	Update of Action Plan	Elaine Highwood	EH/SMT
1.6	24.5.2022	4.5.2023	Adding and Introduction, the Authorising Signature and employer responsibilities	Elaine Highwood	SMT

This Policy should be read in conjunction with Runway Training's Bullying and Harassment Policy

Authorising Officer:

Oliver Traylor, Managing Director

Signature:



Date: 24.5.2022

Introduction

Promoted during the sign-up process, this policy will form part the Induction Process for all learners and will be accessible through their learner handbooks, forming part of their Induction. Internal Stakeholders will be able to access the policy through the shared drive and all stakeholders will be able to access it through Runway's Website.

All staff will be made aware of the policy at Induction, and it will form part of Runway's Mandatory training, which includes training on how to implement the policy principles within their role. Additional training/updates will be given as and when needed. Staff confirm to HR their commitment to the policy, and this is recorded in their individual staff induction record.

This policy will be reviewed on a yearly basis or sooner if legislation/organisational changes impact on the content of this policy.

Equality and Diversity Statement

Our values are centred on the promotion of equality of opportunity and inclusivity in all that we do. We will ensure that all staff and learners work in an environment free from unfair treatment.

Issues of racism, stereotyping and discrimination (see Appendix 1) in any form will be discussed openly with a shared commitment to challenging prejudice and valuing diversity. Runway will actively implement this policy to ensure that all learners, staff and visitors learn and work in a supportive environment in which all individuals are able to succeed.

We value the fact that staff and learners will follow many different faiths and come from a variety of religious backgrounds. We will not promote any religion over any other and will provide a chaplaincy service for all faiths and none.

We are proud of the equal and fair access we offer for learners with disabilities and learning difficulties and the high quality support and teaching that enable all students to success.

We will encourage all staff and learners to recognise and value the contributions of all individuals and to see diversity as a strength that adds value and richness to our learning community. Valued behaviour is defined as

- Demonstrating personal integrity and respect for human dignity
- Committed to supporting the success of learners and staff
- Communicates and collaborates with colleagues and peers and all stakeholders
- Challenges unwanted and unacceptable behaviour in others

This policy explicitly covers all protected characteristics in the Equality Act 2010 which are currently **age, gender, and gender re-assignment, ethnicity, marriage and civil partnerships, disability, race, religion and belief, maternity and parenthood, sexual orientation** and commits the organisation to have due regard to the need to the three aims of the general duty i.e.:

- eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act;
- advance equality of opportunity between people who share a protected characteristic and those who do not;

- foster good relations between people who share a protected characteristic and those who do not.

Furthermore, we believe that **everyone** has the right to equality of opportunity and this policy covers all individuals regardless of social and cultural background, economic status, family and caring responsibilities.

We have **zero tolerance** of any form of discrimination, harassment or other inappropriate behaviour whether direct, indirect or by association or perception. We will challenge **all** behaviour that discriminates, harasses, and victimises individuals or groups of people.

We will ensure that all staff receive a copy of this Equality and Diversity Policy at Staff Induction and at the times of review. A copy will be uploaded onto OneFile and will be made available on Runway Training's Website.

Policy principles

Our commitment to learners, we will:

- Ensure marketing, publicity and recruitment procedures are inclusive and present positive images of all sections of the community.
- Identify the needs of disadvantaged groups and work towards removing any real or perceived barriers to participation and success.
- Promote maximum access to the full range of courses and other educational services for all the people in the communities we serve
- Provide clear and fair recruitment and admission to courses actively re-enforcing Equality and Diversity within Inductions, reviews and teaching and learning activities.
- Make reasonable adjustments to ensure equal access to teaching, learning, assessment, facilities and resources for disabled students
- Promote the rights and responsibilities of all learners to be treated fairly and to treat each other with respect.
- Ensure that teaching, learning and assessment is inclusive using a wide range of teaching methods and resource to promote equality and diversity and develop all learner's knowledge, skills and/or behaviours.
- Ensure all learners are supported to progress, including those on discrete supported provision.
- Promote social inclusiveness and awareness of other cultures and equip our learners to live and work in a diverse society.
- Celebrate diversity through the achievements and positive contributions of our community of learners and staff.
- Provide high quality learning support and ensure that learners are given every opportunity to discuss any learning difficulty or support need.
- Ensure workplace assessment reflects Runway Training's policies on equality and diversity and that employers have an Equality and Diversity Policy in place, communicating the policy to all staff and providing training in order that the policy can be adhered to.

- Ensure that the SMT is active in identifying gaps in the retention, achievement and progression of learners through the analysis of monthly reports and the monitoring of the impact of the interventions.
- Seek the views of all learners and employers throughout the learner journey and continue to evaluate these to improve the learning programmes.

Our commitment to staff, we will:

- Aim to employ a workforce that **at least** reflects the diversity of the local community we serve and to be broadly reflective of our learner population.
- Regularly monitor our staffing profile as a basis for addressing significant imbalances in staffing
- Ensure that the criteria for selection of new staff and the progression of existing employees will be determined solely on the basis of the requirements of the job.
- Set transparent and explicit criteria for career progression based solely on merit
- Ensure all people from under-represented groups are short-listed for interview if they meet the job criteria
- Members of interviewing panels will be trained in fair recruitment practice.
- Create flexible working opportunities such as part-time, term-time working, or job sharing, where possible.
- Implement our equal opportunities training strategy and ensure that all staff are trained and receive regular updates.
- Take positive action to offer opportunities for employment, training and promotion to groups of people who are identified as disadvantaged and under-represented.

Please see the Equality and Diversity Action Plan for further information (Appendix 2)

Governance and Monitoring

The Head of Quality is the nominated lead for Equality and Diversity and will chair the Equality and Diversity Committee Meetings (EDC) which oversees that Runway Training continues to fulfil its legal duties under the Equality Act of 2010 as well as monitoring progress towards Runway's Equality Action Plan (see Equality and Diversity Action Plan)

Runway Training will continue to monitor the:

- Composition of the existing workforce and the recruitment process with particular reference to ethnicity, disability and gender.
- Recruitment, retention and achievement of learners in relation to age, ethnicity, disability and gender or any other relevant criteria.
- Analyse learner satisfaction questionnaires according to age, ethnicity, disability and gender.
- Analyse complaints and grievances in relation to Equal Opportunities.

Runway Training has third party liability and we accept responsibility for ensuring members of the visiting public, volunteers and contractors behave in accordance with our equal opportunities policy

Responsibilities

The Board of Governors: The Board of Governors are responsible for discharging their statutory duty in relation to equality legislation as an employer and service provider. Governors will strive to ensure that the Governing body reflects the diversity of the communities that Runway Training serves and will ensure that the Managing Director actively promotes Equality and Diversity and adequately addresses any identified areas of concern.

The Senior Leadership Team: Provides senior leadership and direction on equality issues. The Head of Quality as part of the Senior Management Team is responsible for ensuring that the action plan is reviewed regularly. All learners, staff, contractors and volunteers will be personally responsible to avoid discriminatory practices and to discourage them in others.

Equality and Diversity Committee: Chaired by the Head of Quality will monitor equality and diversity performance including monitoring and analysing data on learner enrolment and success by gender, race, age and disability in line with Ofsted inspection. It also monitors staff recruitment, retention and promotion in terms of age, race, gender and disability.

Equality and Diversity Lead: The Head of Quality has overall responsibility for ensuring the effective implementation of Equal Opportunities within the company.

Managers: are be responsible for the day-to-day implementation of this policy and its delivery in their area of responsibility.

Staff: are responsible for promoting equality and fostering good relations between people of different ethnic, gender, age, disability and any other protected characteristics. Staff are also responsible for putting policies into practice and challenging inappropriate behaviour from either learners, work placements providers or other members of staff.

Learners: as key stakeholders, learners have a responsibility to comply with all of Runway Training's policies, treating fellow learners, staff and visitors with respect and dignity. Learners are made aware of Runway Training's policies at induction, during reviews and through various methods including posters and messages.

Employers: as key stake holders, employers have a responsibility to ensure that they have an Equality and Diversity Policy, communicating this to all stakeholders, including Runway Training's Learners. Employers should also provide training and guidance for all staff in order that the policy can be adhered to and review the policy regularly to ensure that it is kept up to date and within the law.

Equality and diversity complaints procedure and code of practice

Runway Training will monitor equality and diversity incidents and complaints, and all staff will take responsibility for challenging and recording discriminatory behaviour, harassment and victimisation relating to protected equality characteristics.

Runway Training Harassment and Bullying, Safeguarding and Complaints Policies will enable those who believe they have been a victim of discrimination and harassment to raise concerns and achieve redress without undue delay or difficulty.

Any stakeholder who becomes aware of discriminatory behaviour, harassment or victimisation has a duty to report this in accordance with the above policies:

- Staff should make informal complaints through their line manager (or other appropriate manager when the complaint is in relation to the employee’s line manager)
- Formal complaints should be directed through the grievance procedure in consultation with Human Resources who will offer guidance and support.
- Learners should direct complaints through their Apprenticeship Teachers/Assessor, Tutor or any member of staff they feel comfortable to approach

Runway will provide a supportive environment for those who make claims of discrimination, bullying or harassment

All complaints will be thoroughly investigated, and appropriate solutions sought. We will undertake to implement company wide solutions where this is appropriate.

Legislative Framework

This policy responds to our legal responsibilities incorporated in the Equality Act 2010. It is an overarching policy which takes account of all protected characteristics in law and extends these principles to ensure equality of opportunity for any individual regardless of characteristics or identity. In addition, the table below illustrates the aims of this policy in relation to the positive duties as they currently stand in law.

Disability	Gender	Race
Eliminate unlawful disability discrimination or gender related harassment	Eliminate unlawful gender discrimination or gender related harassment	Eliminate unlawful race discrimination or race related harassment
Assess the impact of all of our policies procedures and activities on disabled people	Assess the impact of all of our policies procedures and activities on men, women and trans people	Assess the impact of all of our policies procedures and activities on people from different racial groups.
Promote equality of opportunity for disabled people, even where this may require more favourable treatment	Promote equality of opportunity for men, women and trans people	Promote equality of opportunity for people of different racial groups Promote good relations between people from different racial groups
Monitoring progress through <ul style="list-style-type: none"> • Disabled representation of staff and learners • Admissions/recruitment data • Retention rates of disabled learners • Staff turnover • Learner success rates • Staff promotions and achievements • Complaints, grievances and disciplinary (staff and learners) 	Monitoring progress through <ul style="list-style-type: none"> • Gender profiles of staff and learners • Admissions/recruitment data • Retention rates of learners • Staff turnover • Learner success rates • Staff promotions and achievements • Complaints, grievances and disciplinaries (staff and learners) 	Monitoring progress through <ul style="list-style-type: none"> • Racial group profiles of staff and learners • Admissions/recruitment data • Retention rates of learners • Staff turnover • Learner success rates • Staff promotions and achievements • Complaints, grievances and disciplinaries (staff and learners)

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| <ul style="list-style-type: none"> • Disabled staff and learner • Engagement in all duties, responsibilities and activities (e.g. committee work) • Increase representation of disabled people in public life | | |
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Appendix 1

Types of Discrimination

Direct Discrimination: This occurs when someone is treated less favourably than another person because of a protected characteristic.

Associative Discrimination: This is direct discrimination against someone because they associate with another person who possesses a protected characteristic (for example, the mother of a disabled child).

Perceptive Discrimination: This is direct discrimination against an individual because others think they possess a particular protected characteristic. It applies even if the person does not actually possess that characteristic.

Indirect Discrimination: Indirect discrimination can occur when an employer has a condition, rule, policy or a practice in the company that applies to everyone but which particularly disadvantages people who share a protected characteristic. Indirect discrimination can be justified if employers can show they acted reasonably in managing their business.

Harassment: Harassment is “unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating an individual’s dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual”. Staff/Learners can complain of behaviour that they find offensive even if it is not directed at them, and the complainant need not possess the relevant characteristic themselves.

Staff are also protected from harassment because of perception and association.

Victimisation: Victimisation occurs when a staff member or learner is treated badly because they have made or supported a complaint or raised a grievance under the Equality Act; or because they are suspected of doing so. They are not protected from victimisation if they have maliciously made or supported an untrue complaint. There is no longer a need to compare treatment of a complainant with that of a person who has not made or supported a complaint under the Act.

Runway Training Equality and Diversity Action Plan 2021-2022

Responsible Officer: Elaine Highwood, Quality Manager		Approved by: Senior Management Team		Reviewed on:	Next Review date: 06.08.22
view date	Comments	Links to Policy Version	Reviewed by	Approved by	
6.8.2021	2021-2022 Action plan built on last years and previous action plans	1.5	Elaine Highwood	SMT	
6.12.2021	Review of Section 1, 3, 4 and 6	1.5	Elaine Highwood	SMT	
4.5.2022	Review of Section 1, 2, 3 and 5	1.5	Elaine Highwood	SMT	

Ref	AFI	Action Required	Lead	By When	Outcomes	Evidence	Progress to Date
1	Continue to provide opportunities for staff development that will raise the awareness and promotion of E&D	All staff to have completed/updated their E&D Training via ETF E&D embedded in Teaching & learning All staff to complete training in Unconscious Bias.	EH	Ongoing Jan 21 Jan 21	All new staff to have completed ETF online E&D modules as part of induction. Evidence of embedded E&D demonstrated on schemes of work/lesson plans/teaching resources. Impact seen in lesson observations and feedback from learners	CPD records Training materials Lesson observation reports	6.12.2021: Staff are currently completing the L2 Cert in Principles of E&D 4.5.2022: E&D training completed – this is now Mand training for all new staff.
2	Continue to Promote Equality and Diversity with employers and partners and learners	Promote E&D to employers and sub-contractors through staff development and monitoring meetings Delivery Staff to discuss employer E&D policies with learners during induction/reviews Learners to undertake ED&I training as part of their Induction Delivery Staff to involve employers in progress review meetings	EH/SM/LH / OT SM/LH/EH SM/LH/	Ongoing At inductions Every 10 weeks	All Runway employers are fully committed and have in place equality and diversity policies and procedures Raised awareness of E&D monitoring and action planning required to develop and improve	Progress reviews Training materials on Google Drive/Padlet/One File to promote E&D Monitoring Reports	4.5.2022: Learner and employer awareness continues to be developed through the Review process where employer attendance is now being monitored All Apprentices have completed or will complete BV training as part of the mandatory Safeguarding update learning programme.

3	Annual monitoring of staff by characteristics – sex race, disability, age	Ensure that data is recorded and monitored to identify patterns in employment	ED&I Team/ SMT	Upon recruitment	Equal opportunities given to all perspective and employed staff Areas of significant imbalance will be identified at an earlier opportunity allowing for action plan in place	A greater diverse workforce	6.12.2021: Data is collected analysed and monitored showing the development of more diverse workforce. 4.5.2022: Data for Jan-Apr 22 has now been completed, further reports on going
4	Continue to review data to identify gaps in the retention, achievement and progression of learners	Reports produced and discussed at monthly QLT meetings Monitoring of the impact of the interventions	SMT and QLT	On going	Patterns identified in learner retention, achievement and progression	Monthly PICS reports	6.12.2021: sector patterns have identified where COVID and OTJ have impacted on retention and achievement rates – on going monitoring and preventative measures are being put in place to support mitigation.
5	Use of e-technology, to facilitate participation/ achievement in response to Covid-19	Expand Runway range of on-line curriculum by developing webinar and on-line learning material. Develop Teachers digital skills to create inclusive remote teaching sessions. Develop and maintain the use of collaborative platforms such as Teams and Zoom	SM/LH OT OT/EH/LH	Feb 21	All work based learners engaging with OneFile and e-technology. Remote delivery will engage learners and promote inclusive learning. Increased success rates Reduction in number of face to face visits	OneFile usage stats Increased timely success rates Learner Feedback	4.5.2022 OTLA's record increased active learner engagement through the development and skilful use of collaborative learning platforms OneFile seat allocation to be increased for next year in response to increased learner numbers and learning programmes access the platform
6	Additional Support for learners including mental health in response to the pandemic	Ensure that additional support is used effectively to support all learners with support needs to participate and achieve Training for staff to support them to recognise learner support needs and deliver high quality support for learners Training for staff to assist them in recognising learner mental health	EH OT OT/EH	Mar 21	Embed throughout all programmes appropriate support for skills for life needs. Well trained and competent additional support staff in place to support learners. Systems in place to monitor quality of performance and impact on retention and achievement. ALS training monitored, reviewed and delivered across all delivery staff. Increased numbers of staff will have	Improved achievement rates for all groups of learners Improved learner satisfaction	6.12.2021: Runway staff have either completed or are working towards becoming a qualified mental health first aider

		needs in order to offer support and signpost to the relevant support network.			completed training in “Behaviour that Challenges” “Learning Difficulties” and Mental Health Awareness Increased numbers of staff will be qualified Mental Health First Aiders		
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