



# Equality, Diversity and Inclusivity Policy

Link to policy on website: [Our Policies - PFP Thrive](#)

Document History: to be reviewed on at least an **annual basis** or sooner if there are significant changes required.

Approval should be the Academy Director or a relevant member of the Academy Governing Board.

**Approved by** | Tom Arey

**Position** | PFP Thrive Academy Director

**Date** | October 2024

**Next Review Date** | October 2025

**Signed**

Tom Arey

PFP Thrive Academy Director

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# 1.Introduction

At Places for People (the Group) we are committed to promoting a culture of inclusion and belonging. This means creating an environment that welcomes and embraces diversity, enabling everyone to contribute to our success and perform to their full potential.

We are a large organisation, providing lots of different services and we work with a wide variety of customers and communities. It's our People that make the difference to our success and we aim to recruit colleagues who bring different perspectives, talent, expertise, commitment and individuality. We're all unique, but together we belong to a winning team.

As a business function with the Group, PfP Thrive operates the same EDI policy and are fully committed to providing a learning environment where everyone is treated fairly, equally and with dignity and respect. We recognise that an open and equal environment will allow each learner to achieve their educational goals and personal and social potential.

We want to celebrate difference and create a place where everyone is valued and respected and can be their true self. We take a zero-tolerance approach to discrimination, harassment or bullying.

Therefore, it is our policy that there will be no discrimination against or harassment of any learner, employee, job applicant, supplier or contractor either directly, indirectly or by association or perception, based on any of the nine protected characteristics under The Equality Act 2010.

Our commitment to equality, diversity and inclusion is more than just a policy. Along with our People Promises, it runs right through everything we do – starting with our recruitment process and continuing throughout the colleague lifecycle. We work hard to ensure everyone is offered fair opportunity to achieve their full potential and thrive. Decisions we make relating to selection and progression will always be made on individual merit, based on robust objective criteria.

We believe that equality, diversity and inclusion should be viewed as intrinsic to all of our work. Promoting and delivering on this is not only good for meeting our legal obligations, but it also enhances our business performance, enables effective delivery of services, improves satisfaction and helps to create stronger communities. We will ensure that we raise awareness of equality, diversity and inclusion matters through our communications, training and colleague involvement.

This policy applies to all our colleagues (which means anyone who works for us regardless of their employment status), our learners, sub-contractors and our partners.

## 2. Our commitment and engagement

The publication of this policy enables PfP Thrive to send a strong message of commitment (both internally and externally) to our ultimate goal of establishing a diverse learner population who feel part of our Community and have every chance of succeeding.

However, although the policy is a fundamental part of the Group's Equality, Diversity and Inclusion Strategy, it will be brought to life only if it is reinforced by senior level support and focused structured objectives.

Overall responsibility for learner EDI lies with Greg Reed (Group Chief Executive Officer, Places for People) with operational responsibility being taken by Karen Halford (Group Chief People Officer, Places for People) and Tom Arey (Director of PfP Thrive).

Every learner and employee is required to work and study within the framework of this policy and assist the organisation in meeting its commitment to provide equal opportunities and avoid unlawful discrimination.

### Group overall commitments:

- We recognise and work to support the unique and diverse needs of our customers and the communities we work in.
- We want to create a genuinely inclusive workplace and Community, where we embrace both the similarities and differences of all our colleagues and learners.
- We design our people processes and practices with intersectionality in mind. This means we recognise that a colleague has multiple aspects to their identity which can overlap and create unique experiences and challenges for them.
- We value all our colleagues and learners for their contribution and we celebrate diversity in all aspects of our business.
- We work with partners who support us in having a diverse and inclusive culture.
- We are against all forms of unlawful and unfair discrimination.
- We won't tolerate bullying and harassment in any form.
- We have multiple ways for colleagues and learners to speak up about issues, whether they are affecting them or someone else at work.
- We won't allow colleagues to wear, display or circulate emblems, badges, clothing, tattoos, posters, graffiti, images, or literature, where it might create an intimidating, hostile, degrading, humiliating or offensive environment for anyone.

## **PfP Thrive additional commitments:**

As a training provider, we deliver training to a wide variety of learners and their employers in the housing sector from different backgrounds and communities in England. To ensure equality of opportunity we will:

- ensure information about our programmes is accessible and written in 'plain English' as well as provide information in different formats where required;
- ensure our application and assessment processes are clearly communicated and fair, including for apprentices with learning difficulties so we do not create unnecessary barriers to participation;
- provide a safe and welcoming environment in our training centres and office locations;
- assess the individual needs of apprentices to understand any support requirements for additional learning needs, making reasonable adjustments while remaining compliant with housing sector fitness and health and safety requirements, for apprentices with disabilities, to participate and achieve their goals;
- embed equality, diversity and inclusion issues into our teaching and learning curriculum to raise awareness and promote good citizenship and British Values;
- challenge discrimination and negative behaviour and empower apprentices to do so;
- gather, process and analyse equality data across our training provision, make required regulatory returns to the ESFA and take positive action to address gaps in achievement between different groups to achieve parity of outcomes for all;
- celebrate success to promote equality and diversity and encourage others to achieve;
- consult regularly about equality and diversity with our staff, learners, employers, partners and external organisations to inform continuous improvement;

## **Learner's commitments are:**

- giving equal consideration to their fellow learners and members of staff and recognise that diversity adds to, not detracts from their learning experience.
- Try to understand other peoples' points of view and help them understand yours.
- If you challenge others, do so in a respectful way.
- Be aware of who is around you and communicate in a professional and sensitive manner. Understand that what is acceptable to one person may not be acceptable to another.
- Take responsibility for your own actions.
- reading and understanding the Equality, Diversity and Inclusion Policy and observing both the content and spirit of the Policy, take time to learn about individual differences you don't fully understand and show tolerance and respect.
- recognising safeguarding issues and that harassment, which includes deliberate or unconscious humiliation, causes offence or distress.
- recognising that consistent teasing, comments about personal characteristics and bullying is a hostile act.
- understanding that anyone who suffers from or witnesses an incident of harassment has a duty to report such behaviour.

## **Employer's commitments are:**

Employers will also be advised of their ED&I responsibilities as part of the introduction and contracting process. They will also be able to access this policy on the company website.

Any partner organisation and sub-contractors will have to reflect this policy within their own working practice and PfP Thrive will not contract with anyone that doesn't meet these standards. As part of the due diligence process, the policy and practices will be reviewed prior to entering any commercial relationships and reviewed annually during contracted reviews. Any policy breaches could lead to disciplinary action, up to and including dismissal or cessation of services.

# 3. Promotion, training and teaching

## Promotion

All staff, apprentices, learners, and employers will receive an induction training session including equality, diversity and inclusion and the policy will be disseminated during this time and after each policy revision/review.

This will include:

- An explanation of what the policy means to PFP Thrive staff, apprentices, learners or employers.
- An explanation of the form's discrimination can take (direct, indirect, victimisation and segregation).
- Guidance on the danger of generalised assumptions and prejudices.
- Contextualised examples of good practice in equality, diversity and inclusion and the impact of discrimination relevant to their role and responsibility.
- Teaching, learning, and assessment staff are given additional training to support equality, diversity, and inclusion in teaching, learning and assessment practice (please see below).
- Equality, diversity, and inclusion will be mandatory on all Governance Board agendas to reinforce this and to identify and address any emerging training needs.

All staff will be appraised annually and there will be positive encouragement to discuss suitable development and training opportunities.

## Training

All staff will be required to complete mandatory annual equality and diversity training. This will also be reinforced by the observation of teaching, learning and assessment process (please see below).

Apprentices and learners will receive training on equality, diversity, and inclusion, which will be embedded and delivered within their apprenticeship/programme (please see below).

## Teaching, Learning and Assessment

Apprentice's and learner's additional support needs related to disabilities, diagnosed special education needs, learning difficulties or additional needs are planned for and where an apprentice or learner is studying or completing an apprenticeship, PfP Thrive will follow the guidelines set out in the relevant Adjustment Policies published by each awarding organisation to ensure fair and equal access to assessments and examinations, where applicable.

All teaching, learning and assessment staff will be trained to apply an equality analysis to their scheme of work and lesson plans to ensure that:

- Materials and teaching, learning and assessment methods foster good relations, are sensitive to and promote equality of opportunity.
- That needs of individuals are planned for in teaching sessions to ensure that they can achieve, progress and flourish.

PfP Thrive management will apply its observation of teaching policy, annual appraisal, and performance management systems to ensure that:

- Teaching, learning, and assessment staff have consistently high expectations in ensuring that learning activities motivate and engage all apprentices and learners, whatever their age, ability and cultural background, and that they are suitably demanding.
- All teaching, learning and assessment staff are highly adept at working with and developing knowledge, skills and behaviours in all apprentices and learners and demonstrate this in a range of learning environments.
- Equality and diversity is integrated fully into the learning experience and teaching, learning and assessment staff manage apprentices' and learners' behaviour skilfully; they show great awareness of Fundamental British Values and equality and diversity in teaching sessions.
- All staff, apprentice and learner requirements will be reflected in the delivery and support given. We will consider how support can be given for SEND or learning disabilities. Where appropriate we will provide the resources and equipment needed to enable all staff, apprentices, and learners to engage with their roles and responsibilities, as well as their learning/training.

# 4. Staff recruitment

The design of jobs, working hours and related practices can discriminate against certain groups of applicants. As vacancies arise the requirements of individual jobs will be reviewed and redesigned where necessary in order to ensure that we can recruit the broadest possible range of suitable people.

PfP Thrive recognises the need to consider, where appropriate, flexible working patterns such as job share, term time only, part-time working or home working where an employee has a need to reduce their working hours. These methods of working will be considered dependent on business needs.

Wherever appropriate vacancies will normally be advertised within the Company in order to provide an equal opportunity for all interested persons to apply.

One exception to the above applies when special arrangements are made for the redeployment of personnel who would otherwise be at risk of redundancy within the Company.

Personal details which are not necessary for a recruitment decision to be made - such as marital status, number of children, next of kin, gender, age, race, or religious belief are, therefore, not specified. Additional details of this nature will be needed for recording and monitoring purposes and as such will be kept by the Human Resource Department on a separate confidential form.

Training in interviewing skills and equality and diversity will be given for all those concerned with recruitment. Prior to the selection process, managers will examine all selection criteria to ensure that they are related to the job requirements and are not discriminatory.

Consideration should be given as to whether practical experience or actual achievements in previous employment may act as a satisfactory substitute for higher education or professional qualifications. In assessing qualifications, it will not be assumed that overseas diplomas or degrees are of a lower standard than their UK equivalents although their validity will still be checked. Wherever possible experience may count as an equivalent to professional qualifications. Careful consideration will be given as to whether any minimum or maximum number of years relevant experience is necessary for effective performance of the job. Such restrictions will not be imposed unless there is a proper job-based reason why they are necessary.

All appointments will be made solely on merit.

# 5. Progress and achievement

PfP Thrive will measure and report annually on groups of apprentices and learners to identify any significant variations in their progress and that the achievement rate of apprentices and learners is in line and greater than the national average. We will set challenging targets to ensure that the performance and destinations of different groups of apprentices and learners are carefully monitored, and appropriate action is taken to close any identified gaps.

We will ensure that all equality and diversity aspects are fully assessed, and appropriate action is built into strategic plans and the impact of plans is monitored and follow-up action is taken to address areas for improvement.

We will ensure that staff, apprentices, and learners understand their roles and responsibilities in relation to equality and diversity.

Through the implementation of accompanying policies we will ensure that apprentices, learners, employers, and staff are protected from harassment, bullying and discrimination, including those based with employers and at other sites external to the provider and that incidents and complaints specifically about equality, diversity and bullying are proactively managed and acted upon, including, where appropriate, providing counselling and support.

We will ensure that arrangements for apprentice, learner and employer feedback actively facilitate all apprentices, learners and employers, including those with learning difficulties and/or disabilities, to share their views on the provision.

# 6. Protected characteristics

It is against the law to discriminate against someone against protected characteristics, these include:

- age
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race
- religion or belief
- sex
- sexual orientation

## **Age, Gender, Sexual Orientation, Transgender, Marital Status**

No discrimination will be accepted with regards to the gender of the individual. All apprentices will be encouraged to participate in all activities regardless of gender or age. All staff and apprentices will have the same opportunities and be treated in the same manner regardless of their gender or age. No discrimination will be made with regard to individual sexual preferences and marital status.

## **Religion, Ethnic origin, Cultural origin**

No individual will be refused a place on the grounds of religion, ethnic origin or culture. Information will be available to all whenever possible.

All apprentices and staff will be expected to respect individual religion, ethnicity and cultural differences.

The curriculum encourages both staff and apprentices to treat everyone with equal concern and respect and to value each other. Questions about racial and cultural differences will be answered in a clear, factual way that is understood in an appropriate manner.

We are committed to ensuring all stakeholders are supported to maintain the best standards of Fundamental British Values.

Where possible we provide the use of multi-faith rooms for the use of faith-related activities.

## **Disability**

We are committed to the integration of apprentices and staff with a disability or additional needs. Extra help or special arrangements may be required including 'reasonable adjustment'.

The organisation will not discriminate directly or indirectly against a disabled apprentice or staff member. It is recommended that all disabilities or special needs are made known so any necessary reasonable adjustments can be made as soon as possible to promote engagement in work and learning.

As part of our provision, we have access to a learning support team in place to tailor and individualise a learner's journey in order to reach their full potential and best outcome.

# 7. Disabilities and reasonable adjustments

We know that not all disabilities are visible, and that two learners with similar circumstances might find they need different support. You'll never suffer any disadvantage from telling us you've got a disability, so talk to your tutor or the Head of Apprenticeship Development to make sure you get the support you need. We'll always treat this information sensitively and confidentially.

There are, however, health and safety regulations in force in the housing sector that we must always comply with when considering applicants for staff appointments and apprenticeships. Subject to the health and safety regulations referenced above, we will offer all reasonable and practical support to employees and job applicants who have a disability as defined by the Equality Act 2010.

Under the terms of this policy, we will ensure that our managed learners who have an identified disability or additional learning needs receive reasonable adjustments and appropriate support from the Academy and its partners throughout their apprenticeships.

## **Special Consideration / Reasonable Adjustment**

Reasonable Adjustments are agreed upon at the pre-assessment planning stage or throughout the duration of their apprentice's programmes and any action that helps to reduce the effect of a disability or difficulty, which places the apprentice at a substantial disadvantage in the assessment situation.

Reasonable adjustments must not, however, affect the reliability or validity of assessment outcomes nor must they give the apprentice an assessment advantage over other apprentices undertaking the same or similar assessments.

Special Considerations are a post-assessment allowance to reflect temporary illness, injury, or indisposition that occurred at the time of assessment. Any special consideration granted cannot remove the difficulty the apprentice faced at the time of assessment and can only be a relatively small adjustment to ensure that the integrity of the assessment is not compromised.

Apprentices understand that reasonable adjustments must be approved (internally or externally) and set in place prior to assessment commencing.

Below are examples of reasonable adjustments. It is important to note that not all adjustments described below will be reasonable, permissible, or practical in particular situations. The apprentice may not need, nor be allowed the same adjustment for all assessments.

Reasonable Adjustments may fall into the following categories:

- Changes to assessment conditions e.g. extra time to complete the activity, reorganising the assessment room to remove unnecessary stimuli
- Modification to the presentation of assessment material e.g. on coloured paper, use of alternative fonts
- Using assistive technology e.g. screen reading or voice activated software
- Alternative ways of presenting responses e.g. from written assessment to a spoken one, different coloured backgrounds or lighting/brightness of screens

# 8. Code of conduct

Places for People Group, and as a result PFP Thrive, will not allow harassment or bullying to apprentices or staff. This can include unwelcome comments or behaviour, repetitive criticism, intimidation, insulting, aggressive, undermining self-confidence or the misuse of power. Any action which makes the recipient feel upset, humiliated, threatened, or vulnerable. If the offensive behaviour is made by apprentices, an on-the-spot explanation of why it is not accepted will be made and where required an escalation will be made. Any breach of this policy by an employee or apprentice may result in disciplinary action.

## **Resolving discrimination, harassment or bullying**

The following provides an outline of the informal and formal procedures that may be instigated as a result of allegations involving discrimination harassment and/or bullying.

### **Informal Resolution**

Whether the colleague has been discriminated against, harassed or bullied by another colleague, the first step to take is to try to resolve the problem informally. In some cases, it may be possible and sufficient to explain clearly to the person engaging in the unwanted conduct that the behaviour in question is not welcome, it is found offensive and needs to stop immediately.

In circumstances where this is too difficult or uncomfortable for the colleague to confront their alleged harasser, they should seek support from a friend at work or speak to your Line Manager.

Alternatively, the Company would encourage them to put this in writing to the person causing offence.

If in doubt as to whether an incident or series of incidents could constitute discrimination, harassment or bullying then advice can be sought from your Line Manager who will be able to advise on the most appropriate way to deal with the matter in strictest confidence.

Every encouragement must be provided by colleagues for the informal stage to be followed in the first instance. This will give every opportunity to those involved to recognise the effect the behaviour is having and obtaining a mutually agreeable resolution.

If, however, after exhausting all informal attempts the problem cannot be resolved then a formal complaint should be raised, as detailed below.

## **Making a formal complaint**

A formal complaint must be in writing to the Head of Apprenticeship Development and state:

- The name of the person causing the offence
- The nature of the unwanted conduct
- The dates and times when the misconduct has occurred
- Names of witnesses to any incidences
- Any action already taken to stop this behaviour

This will be reviewed and a course of action decided upon, which may constitute an investigation.

# 9. Policy review and version control

This Policy will be reviewed annually or in the event of changes in rules or to take into account changes in working practices that may result from incidents.

**Date of Publishing** | October 2024

**Review Date** | October 2025

**Policy/Process Owner** | Apprenticeship Leadership Team

**Signed**

Tom Arey

Director of PFP Thrive

23/12/2024

A handwritten signature in black ink, appearing to read 'Tom Arey', followed by a long horizontal line.

# Version Control

Version	Date	Action	Amended by	Reviewed by
V1.0	September 2024	New policy creation	Rebecca Edwards Academy Consultant	Tom Arey PFP Thrive Director
V1.1	October 2024	Updated job titles	Rebecca Edwards Academy Consultant	Tom Arey PFP Thrive Director
V1.2	December 2024	Updated following feedback from MS Consulting	Rebecca Edwards Academy Consultant	Tom Arey PFP Thrive Director
V1.3	May 2025	Rebranded on to new template	Rebecca Edwards Academy Consultant	Tom Arey PfP Thrive Director

# Appendix A: Equality and the law

Our commitment to Equality, Diversity and Inclusion, is supported by the Equality Act 2010. It is important for colleagues to understand that as well as the Group's expectations, we are all required by law to comply with this legislation.

The aim of the Equality Act is to improve equal opportunities and fairness for colleagues and job applicants. Under the Act, it is unlawful to discriminate against people at work. It also protects prospective colleagues against discrimination in the recruitment process and extends beyond someone's employment to include protection from discrimination, e.g. in the provision of a reference and in other post-employment acts. It's important to know that the Act also covers contract staff and agency workers.

Under the Act, there are nine 'protected characteristics' and it is unlawful to discriminate, harass or victimise anyone on the basis of one or more of these protected characteristics. They are: Age, Disability, Gender Reassignment, Marriage and Civil Partnership, Pregnancy and Maternity, Race, Religion or Belief, Sex and Sexual Orientation.

The Group has a zero-tolerance approach to bullying, harassment or victimisation – whether this is related to a protected characteristic or other aspects of difference such as, education or social background, thinking style, physical appearance or political belief. You can find out more in the Respect policy.

# Appendix B:

## Key terms

**Equality** is about having a fair workplace and creating equal access to opportunities.

**Diversity** means 'difference' and is about recognising both individual and group differences, treating people as individuals and valuing the contribution that each of us can offer. We see difference not as something to be tolerated or accepted but as something to be celebrated. Some aspects of difference may be visible, such as skin colour, age and physical ability. Equally important are the aspects of diversity which may not always be visible such as religion, nationality or level of education.

**Inclusion** means valuing people's differences and enabling everyone to thrive at work. Building an inclusive, accepting culture involves both flexibility and acceptance. An inclusive working environment is a space where people feel comfortable and valued. Colleagues feel their contribution matters and they are able to perform to their full potential, regardless of their background, identity or circumstances.

**Equity** means recognising that making the same opportunities available to everyone doesn't always achieve equality of outcomes. People come to us from a variety of cultures and social backgrounds and bring a range of skills and experiences. We acknowledge that we all have different needs, and we want to make sure we provide the right support so that everyone has fair access to opportunities. Our approach is to treat each person as an individual and to provide them with what they need to succeed.

**Belonging** refers to the perception that you are part of a workgroup and an essential member of that group. Inclusive workplaces nurture employees' social and emotional needs for connection with others. Belonging is the experience of community spirit—being part of a collective whole and treated with respect and dignity.

### Discrimination

There are different ways in which discrimination can occur, as set out below.

**Direct Discrimination** occurs when someone is treated less favourably than another person because of a protected characteristic they have or are thought to have (see 'perceptive discrimination' below) or because they associate with someone who has a protected characteristic (see 'associative discrimination' below).

**Associative Discrimination** means direct discrimination against someone because they associate with another person with a protected characteristic.

**Perceptive Discrimination** means direct discrimination against an individual because others think they possess a particular protected characteristic. It applies even if the person doesn't actually possess that characteristic.

**Indirect Discrimination** can occur if a condition, rule, policy or even a practice that applies to everyone is applied in a manner that disadvantages people who share a protected characteristic.

**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'. Colleagues are able to report behaviours they find offensive – even if it is not directed at them, the process for this is set out in the Respect policy.

**Victimisation** occurs when a colleague 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. However, this doesn't apply if a complaint has been made maliciously or is untrue.