TSP Learn Equality, Diversity and Inclusion Policy

1. Introduction

1.1 TSP Learn is committed to promoting and maintaining equality, diversity and inclusion and to the prevention of discrimination and/or harassment in relation to all aspects of our business. We believe in giving opportunities, access and respect, by recognising every individual's needs. It is an issue which concerns everyone; for a whole range of reasons people do not always have the same opportunities. Unless all tutors, trainers, assessors, admin/support staff, learners, employers and managers are involved, lasting change will not take place.

1.2 This policy sets out TSP Learn's obligations in relation to equality and diversity and how we intend to fulfil those obligations and promote and maintain equality of opportunity and diversity in everything we do. In so doing we intend to meet the expectations of our learners, clients, employees and suppliers and the funding and regulatory bodies.

1.3 This policy is compliant with the Equality Act 2010 and the Apprenticeships, Skills, Children and Learning Act 2009. It also aligns with the expectations outlined with Ofsted regarding equality, diversity and inclusion.

1.4 This policy will be published on TSP Learn's website and made available to learners, employees and others upon request. We can provide this policy in other formats if required.

1.5 For TSP Learn, inclusion means ensuring that every learner can participate fully and has a fair opportunity to complete their qualification or apprenticeship successfully. We will identify and address practical barriers to learning and provide timely support for vulnerable or disadvantaged learners. We maintain high expectations and the integrity of the curriculum while making the adjustments and providing the support each learner needs to achieve their goals.

2. Monitoring and review

2.1 The writing of a policy statement in itself does not constitute an effective Equal Opportunities policy for TSP Learn. This can only be achieved by training, awareness raising, clarity of ethos, target-setting, continued review of data, observation of practice and evaluation of the impact of this policy.

2.2 TSP Learn will monitor the implementation of this policy on an ongoing basis to ensure that the principles and procedures set out in it are being effectively implemented and a formal monitoring process shall be carried out and recorded in accordance with 2.3 below.

2.3 We will monitor by reviewing on an annual basis the operation of this policy by careful consideration of whether all of our business activities were compliant with it. We will set and monitor annual Equality and Diversity Impact Measures (EDIMs). In the carrying out of such monitoring we will give due regard to any complaints. We will use the Self-Assessment Review (SAR) process to identify and, where our resources allow, address any failure to implement this policy and best practice. Leadership of equality of opportunity is given a high priority in the organisation and is the responsibility of the Managing Director. Reviews will be carried out by the Senior Management Team

2.4 TSP Learn works in partnership with other organisations in the delivery of work-based learning. We will make this policy known to such third parties and undertake whatever actions are appropriate

in relation to their own obligations to be aware of, promote and maintain TSP Learn's policy in relation to equality and diversity

2.5 We will evaluate inclusion through learners' experience of training and the outcomes they achieve. Monitoring will consider participation, retention, achievement and progression for different learner groups, together with learner feedback and evidence about whether support and reasonable adjustments are effective. Where gaps or barriers are identified, responsible managers will agree, record and review improvement actions.

3. Key principles

3.1 TSP Learn will not, in its dealings with learners, clients, employees, suppliers, or any third party, discriminate against any person, nor victimise or harass them on the grounds of any of these protected characteristics:

a) race or racial group (including colour, nationality and ethnic origins);
b) sex;
c) sexual orientation, whether actual or perceived;
d) religion or belief;
e) age whether actual or perceived;
f) disability (including mental health and people diagnosed as clinically obese)
g) gender
h) marriage and civil partnership; or
i) pregnancy and maternity.

3.2 Our approach to inclusion is guided by the following principles:

- High expectations for all learners, without lowering standards or unnecessarily limiting access to the full curriculum.
- Fairness, belonging and mutual respect, with bullying, harassment and discrimination challenged promptly.
- Early and proactive identification of learning needs, mental health concerns and other barriers through initial assessment and ongoing review.
- Timely, individualised support that enables learners to participate, progress and achieve.
- Close alignment between inclusion and safeguarding, recognising that learners with SEND and learners in vulnerable circumstances may face additional risks or barriers.

4. Scope

This policy will cover all functions of the organisation, including:

- Selection, recruitment and initial assessment of learners
- Participation, achievement and progression
- Induction, options choice, delivery and management of learning
- Assessment, verification and observation
- Curriculum content and resources
- Staff recruitment, training, performance management and salary review
- Community links and partnerships
- Learner, employer and staff feedback
- Complaints, grievances, harassment and bullying
- Impact of policies and procedures

- daily professional contact with each other including conduct in staff meetings
- conduct of staff towards learners, employers, outside agencies and other members of the community who come into contact with TSP Learn
- employers working with apprentices who must actively demonstrate commitment to EDI principles through their workplace policies, practices, and culture.
- early identification and ongoing review of learning, social, emotional and practical barriers
- individual support planning, reasonable adjustments and assistive technology where appropriate
- support for learners with SEND, high needs, English as an additional language, mental health needs or other vulnerabilities

5. Explanation of terms used in this policy

5.1 What is discrimination?
Discrimination occurs when one person is treated less favorably than another is treated, or would be treated, in the same or similar circumstances without legitimate reason.
Direct discrimination occurs where one person treats another less favorably on the basis of the grounds set out in 3.1 above and on the basis of a protected characteristic.
Indirect discrimination occurs where a provision, criterion, practice, requirement or condition which is applied to everyone has the effect of placing at a disadvantage a particular person, or group of people, on the basis of the grounds set out in 3.1 above except age.
Indirect discrimination can occur whether or not the person intended to discriminate against the person or group of people affected.
Associative discrimination – this is direct discrimination against someone because they are associated with another person with a protected characteristic.
Victimisation – Victimisation occurs when a person is treated less favorably because he or she has asserted a right not to be discriminated against on one of the grounds set out in 3.1 above. The protection applies only to assertions made in good faith. An example would be discrimination against someone because, for example, they made a complaint under Equality Act legislation.
Discrimination by perception – this is direct discrimination against someone because others think they have a protected characteristic, even if they don't. This would include discrimination against someone who was thought to be gay.
Harassment Harassment occurs when one person subjects another to "unwanted conduct that has the purpose or effect of creating an intimidating, hostile, degrading, humiliating or offensive environment", in other words threatening, abusive or insulting behavior, words or actions, which violate the other person's dignity or create a humiliating, intimidating or hostile environment. Harassment may involve physical acts or verbal and non-verbal communications and gestures. A series or minor acts or comments can constitute harassment as can a one-off act of sufficient severity.
Harassment by a third party – this means that an employer could by liable for harassment of staff or customers by a contractor

5.2 What is less favorable treatment? Less favorable treatment, as used in relation to disability discrimination, occurs when a person with a disability is treated in a detrimental way in circumstances where a person without that disability would not be so treated.

5.3 What is a disability? A person has a disability if (s)he has a physical or mental impairment, which has a substantial and long-term adverse effect on his ability to carry out normal day-to-day activities.
5.4 What is failure to make reasonable adjustments? Failure to make reasonable adjustment is a failure to take such steps or adjustments as are reasonable to ensure that arrangements for learners, employees, partners, the premises from which business is undertaken and the service provided, do not put at a substantial disadvantage a person with a disability when compared with a person without that disability, without justification. The duty to make reasonable adjustments where failure to do so cannot be shown to be justified comprises of:

1. changing practices, policies and procedures;
2. providing auxiliary aids and services;
3. overcoming a physical feature by removing, altering or avoiding it or by providing services by alternative means

Consideration of whether an adjustment is reasonable might include an assessment of the following:

1. the effectiveness of the adjustment
2. the cost and availability of resources and any unreasonable disruption it might cause.

5.5 Practical examples

Teaching and Learning:

- Subject content and resources should be aimed equally at all learners.
- Teaching and learning strategies/styles should encourage everyone to participate equally.
- Initial assessment and ongoing review should identify learning, social, emotional and practical barriers early. Staff should plan and review appropriate support with the learner, using an Assess, Plan, Do, Review approach where suitable.
- Reasonable adjustments may include adapted teaching methods, accessible or modified learning resources, assistive technology, flexible delivery and changes to assessment or workplace arrangements, without lowering the required standard.
- It is sometimes appropriate to regroup learners to encourage progress which is independent of stereotyping.
- Be aware of stereotypes in our teaching materials, our own attitudes and student responses.
- Appropriate action should be taken to rectify or challenge. When resources or learning materials are issued, be aware of existing deficiencies in terms of equality of opportunity. This extends to the information and imagery used on the company website and learner area.
- When appropriate, learning activities and materials, which give a non- discriminatory perspective and which offer positive images, should be selected.
- Timetabling of visits and courses should be carried out with reference to equality of opportunity.
- Each learner should be supported, should they wish to take up a placement in work which is traditionally regarded as being more suitable for a particular group of people to which they do not belong.
- Learners should receive any support which may be necessary to overcome prejudice at the place of work or amongst their peer group.

Information, Advice and Guidance

- Tutors and those involved in advising on training programs must adopt positive measures to raise learners' awareness of stereotyping.
- There is a clear need to challenge social and peer group pressures that may lead to an imbalance in choices.
- Learners should be able to make informed decisions and to be aware of all the opportunities open to them. They and their employers should be encouraged to consider all the alternatives.
- Wherever possible, material should be used which gives positive images of non-traditional roles. Materials which limit horizons through stereotypes should be avoided.
- Learners should have the opportunity within the working environment or during taught sessions to meet and talk to people who provide positive role models and challenge stereotypical views. Behaviour
- Do not have different expectations of learners, employers or colleagues based on stereotyping.
- Avoid assigning stereotyped roles, eg males fetching and carrying, females dealing with admin/catering arrangements.
- Challenge discriminatory language or behavior and deal with it promptly.
- Be aware that evidence from research shows that tutors and trainers frequently give more time to certain individuals or groups. We need to seek ways to redress any imbalance so that all learners have equal access to tutors and trainers

Staffing

- Young people are significantly influenced by the adults, both teaching, training and support staff, within a working or learning environment. Help to convey a message of equal worth by the example set to learners.
- It is important that we value different role models in terms of TSP's staffing (teaching and non-teaching) in relation to race, sex, sexual orientation, religion or belief, age, disability, social class or group.
- All staff and learners should be encouraged and entitled to develop their expertise and careers through internal training days, courses, and other opportunities for professional and personal development

6. Practical implementation of the policy

Relevant data will be collected, analysed and used to improve processes and evaluate the effectiveness of changes made. Data collected will include learners' recording of gender, age, disability and ethnicity so that comparisons with the profile of staff in the industry can be made. Efforts will be made to explain why such data is collected. Data will also be used to monitor the outcomes for different groups of learners, including achievement, retention and where available, progression.

6.1 Inclusive learner support

- Learner needs and barriers will be explored through robust initial assessment, induction and regular progress reviews. Staff will not wait for a learner to fall behind before considering support.
- Support will be proportionate to individual need and may include assistive technology, adapted resources, English and math's support, practical help to access learning, signposting, and liaison with employers or specialist services.
- For learners with an Education, Health and Care Plan or other identified high needs, staff will coordinate support and review its effectiveness with the learner and relevant partners.
- Employers will be supported to provide safe, accessible workplaces and reasonable adjustments that enable apprentices to participate in training, assessment and workplace activities.
- Staff will focus on each learner's strengths and potential. A learner's background, SEND or previous difficulties must not lead to lower expectations.
- Complaints, learner, employer and staff feedback and trends over time will be captured and used to improve practice.
- Any serious incidents of discriminatory behavior or harassment will be recorded, monitored and acted upon following the procedure set out in our Learner and Employer Guides. We operate a zero-tolerance approach to harassment and bullying, ensuring apprentices and staff can report concerns confidentially and access support promptly.
- Senior managers will monitor the reporting to identify patterns and trends and to determine any action necessary in individual cases or as a whole-organisation issue.
- Every student/learner and member of staff should develop the knowledge, skills and understanding to participate in and contribute to a multi-ethnic society.
- Teaching and learning will reflect the principles of equality and diversity, preparing learners to respect and work effectively in a diverse society. Apprenticeship programs will also incorporate British values, including respect for democracy, individual liberty, and mutual respect.
- We will provide support for learners and staff experiencing mental health challenges through signposting to services, reasonable adjustments, and fostering a culture of openness.
- Where appropriate outside agencies will be approached for further guidance and training.

Inclusion and safeguarding will be considered together. Concerns about a learner's welfare or safety must be reported and managed in accordance with TSP Learn's current safeguarding policy and procedures.

- Staff will be expected to support students/learners in their class for whom English is an additional language and to incorporate principles of equality and diversity into all aspects of their work.

7. Communication

The policy will be made available to all staff, learners and employers. The senior management team will champion EDI leadership and ensure regular review of policy effectiveness via the Operations & Administration Management Team. If any training needs are associated with the successful adoption of the policy these will be identified and built into the continuing professional development programme.

This policy will be reviewed yearly.
Next review due September 2027.