

# **EQUAL OPPORTUNITIES POLICY**

**SIGTA Limited**

Updated & Reviewed June 2021



## Policy Aims

- 1 To recognise and promote the benefits of diversity and demonstrate commitment to equality of opportunity by actions that treat everyone associated with SIGTA fairly and lawfully according to their needs. SIGTA will promote a culture where employees, apprentices and learners are:
  - treated with dignity
  - feel valued
  - have the opportunity to develop to their full potential, in line with their own aspirations, the needs of the organisation and the requirements of any training programmes being undertaken
- 2 To ensure recruitment and selection of staff and apprentices/learners is based on open criteria relevant to the position or programme and is never unfair or unlawful because of discrimination (direct or indirect) against protected characteristics defined in the Equality Act 2010.
- 3 To work in partnership with others to remove the barriers that may face those from under-represented groups wishing to enter areas of work or training covered by SIGTA's operation and to promote the opportunities available.
- 4 To ensure equal opportunities and the management of diversity is mainstreamed throughout the policies and practices of SIGTA Ltd
- 5 To promote awareness, understanding and good practice in the areas of Equality, diversity and inclusiveness among SIGTA employees, employers and apprentices/learners.

## Responsibilities

All staff should understand they, as well as their employer, can be held liable for acts of bullying, harassment, victimisation and unlawful discrimination in the course of their employment, against fellow employees, customers, suppliers and the public. The fact that a discriminatory act was undertaken without the employer's knowledge or consent provides no defence in law, unless the employer can show that all reasonable practical steps were taken to prevent such discrimination.

- 1 SIGTA's Board has overall responsibility for the development, implementation and evaluation of SIGTA's Equal Opportunities policy.
- 2 The General Manager has lead responsibility for the day-to-day implementation of this policy and for ensuring that the principles are incorporated in future strategic development and business plans of SIGTA Ltd and that ongoing monitoring of its implementation and impact takes place. The General Manager will report regularly to the board.
- 3 Managers have responsibility for ensuring that they fully comply with this policy and that equal opportunities and diversity are effectively addressed in all areas of SIGTA activity.
- 4 All staff have individual responsibilities for ensuring they implement this policy in all aspects of their work and, where appropriate, actively encourage learners and staff from SIGTA member organisations to develop high levels of EO&D awareness and practice.

## Recruitment, Selection and Training

Selection procedures, training and assessments are reviewed regularly to ensure they are in line with current good practice and that a pro-active approach is taken to remove barriers. This includes recognition of changing educational curriculum, training methods and awareness of language and cultural differences among people from different backgrounds. Advice, information and training will be offered to member organisations, apprentices and learners to assist them in developing their EO&D practices.

SIGTA Ltd received the 'Double Tick Award' from Jobcentre Plus, recognising the organisations approach and practice in the recruitment of individuals with disabilities. This recognition has now been replaced by the 'Disability Confident' scheme. SIGTA will aim to achieve recognition under this scheme at Level 2.



All individuals applying for apprentice positions and other government funded training programmes are tested and assessed to accurately determine their starting point. Where a disability or particular need is identified, that has a specific impact on the chosen area of study, all reasonable adjustments will be made to ensure the learner can succeed. If the assistance required is beyond the scope of SIGTA, the learner will be signposted towards suitable alternative provision.

Employers are made aware of the special help they can obtain to assist people with disabilities to settle into work placements and jobs, including apprenticeships.

## **Complaints, discipline and grievance**

All aspects of the Equal Opportunities policy are covered by SIGTA's Complaints, Discipline and Grievance procedures, a copy of which is supplied to all staff.

The Apprentice Commitment Statement and Information Folder provides guidance on the SIGTA complaints process. A copy of the complaints procedure is also available via SIGTA's website: [www.sigta.co.uk](http://www.sigta.co.uk).

## **Equal Opportunities and Diversity Training**

All employees receive training in the area of equal opportunities and diversity. This is regularly monitored and updated as required. EO&D Training and outcomes are monitored by the General Manager.

Equal Opportunities and diversity is a standard agenda item at monthly training team meetings. Its inclusion is designed to maintain a high operational awareness of this important area, to facilitate the identification of EO&D issues and to contribute to continuous improvement of SIGTA's and individual staff members practice in this area.

SIGTA managed apprentices are required to participate in Apprentice Development Workshops that explore and challenges views about equal opportunities, diversity and inclusion.

SIGTA training staff are required to further develop the EO&D understanding of apprentices during learner reviews/training sessions. This will be achieved through the discussion of current issues relating to EO&D (inside or outside the workplace), the application of EO&D to the behaviours required in the apprenticeship and the use of information/worksheets to further promote understanding in particular aspects of EO&D. The same approach is used to develop apprentices understanding of Safeguarding, British values and Prevent.

## **Application of EO&D with Employers and Subcontractors**

SIGTA's General Manager is responsible for the monitoring and effective implementation of SIGTA's EO&D policy.

SIGTA seeks to ensure that the member companies (employers) it contracts with for the training of apprentices and other government funded learners, treat apprentices/learners fairly in line with current legislation and good practice.

Employers are asked to confirm they understand their equal opportunities obligations and comply with current legislation, before apprentices/learners are placed with them.

When a new member company (employer) joins SIGTA, SIGTA's sales executive explains the requirements relating to equal opportunities and offers advice and assistance to the company. Including, if required, an outline policy based on the SIGTA model to help with the development of the member's policy.

SIGTA will ensure that any subcontractors used to contribute towards the training of apprentices and other learners apply appropriate EO&D approaches to ensure all apprentices/learners are treated fairly in line with current legislation and good practice.

SIGTA staff will use the opportunities offered by their regular visits to employers and apprentices/learners to promote and reinforce ongoing awareness and understanding of equal opportunities and the benefits of diversity and inclusion.

If in the opinion of SIGTA Ltd, equal opportunities standards within a member organisation or subcontractor fall short of their obligations, SIGTA will work with the employer/subcontractor to address the situation. If the situation cannot be corrected to SIGTA's satisfaction and in all cases where apprentices could be disadvantaged, SIGTA will reserve



the right to cancel its contract with the organisation concerned. In the event of a contract being cancelled, SIGTA will take all appropriate action to minimise disruption and ensure apprentices continue to receive a high quality learning experience.

## **Monitoring**

SIGTA will monitor and record legitimate equal opportunities information about staff, directors/trustees and learners, including age, gender, ethnicity, and disability.

Where it is appropriate and relevant to do so, and where doing so will not cause offence or discomfort to those whom it is intended to protect, SIGTA will monitor additional equality and diversity information. This data will be used to ensure users of SIGTA are not being discriminated against in terms of the opportunities or benefits available to them and to ensure users of SIGTA services are representative of the wider population. Equal opportunities information gathered in this way will be used exclusively for the purposes of equal opportunities monitoring and shall have no bearing on opportunities or benefits made available to individuals or groups.

We are aware that individuals may choose not to disclose requested information and that care will be taken to avoid inadvertent discrimination in such cases.

We will store equal opportunities data as confidential personal data and restrict access to this information.

## **Continuous improvement**

When new legislation is introduced bulletins are issued to staff and, if appropriate, additional training provided, to ensure staff are aware of the changes and the relevance to their role. Current legislative updates are incorporated in the initial training for new staff.

SIGTA works with external organisations to maintain, update and develop organisational and individual awareness of EO&D. The Education Training Foundation is seen as a key provider of good quality resources for staff development and CPD.

Employees, employers, apprentices/learners and others are encouraged to contribute suggestions for the improvement of this policy and its implementation.

## **Relevant Legislation - Equality Act 2010**

SIGTA's Equal Opportunities policy is informed by the requirements of the Equality Act 2010.

The Equality Act came into force on 1 October 2010. The Equality Act brought together separate pieces of legislation into one single Act. The Equality Act provides a legal framework to protect the rights of individuals and advance equality of opportunity for all.

The Equality Act simplified, strengthened and harmonised legislation to provide Britain with a discrimination law that protects individuals from unfair treatment and promotes a fair and more equal society.

The main pieces of legislation that were merged to create the Equality Act 2010 are:

- the Equal Pay Act 1970
- the Sex Discrimination Act 1975
- the Race Relations Act 1976
- the Disability Discrimination Act 1995
- the Employment Equality (Religion or Belief) Regulations 2003
- the Employment Equality (Sexual Orientation) Regulations 2003
- the Employment Equality (Age) Regulations 2006
- the Equality Act 2006, Part 2
- the Equality Act (Sexual Orientation) Regulations 2007



The Equality Act 2010 defines 9 protected characteristics and 6 types of discrimination.

## Protected Characteristics

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

## Types of Discrimination

- **Direct discrimination** - occurs when someone is treated less favourably than another person because of a protected characteristic or because they associate with someone who has a protected characteristic
- **Discrimination by association** - applies to age, race, religion or belief, sexual orientation, disability, gender reassignment, and sex. This is direct discrimination against someone because they associate with another person who possesses a protected characteristic.
- **Perception discrimination** - Applies to age, race, religion or belief, sexual orientation, disability, gender reassignment, and sex. 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** - applies to age, race, religion or belief, sex, sexual orientation, marriage and civil partnership, disability and gender reassignment. Indirect discrimination can occur when you have a condition, rule, policy or even a practice that applies to everyone but particularly disadvantages people who share a protected characteristic. Indirect discrimination can be justified if you can show that you acted reasonably in achieving a legitimate aim.
- **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. Employees can complain of behaviour that they find offensive even if it is not directed at them, and the complainant need not possess the relevant protected characteristic themselves.
- **Victimisation** - occurs when an employee 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. An employee is not protected from victimisation if they have maliciously made or supported an untrue complaint.

Approved By:



Alison Foxwell  
Chief Executive

Reviewed and updated June 2021



**Note regarding review.** The policy will be reviewed each year as part of the management review of the business. A date and countersignature will be added to the policy when complete.

Reviewed: June 2021

