



CTP Equality, Diversity & Inclusion Policy v9.0

Effective from: 31 July 2025

Last Review & Update: 31 July 2025

Next Review: 1 August 2026

Signature: *A. Ahmed*

Position: Director of Policy

Signature Date: 31 July 2025

INTRODUCTION

1. We are an equal opportunities employer and training provider. We are committed to equality of opportunity and to providing a service and following practices which are free from unfair and unlawful discrimination. The aim of this policy is to ensure that no applicant or member of staff or learners receive less favourable treatment on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation, or is disadvantaged by conditions or requirements which cannot be shown to be relevant to performance. It seeks also to ensure that no person is victimised or subjected to any form of bullying or harassment.
2. We value people as individuals with diverse opinions, cultures, lifestyles and circumstances. All employees and learners are covered by this policy and it applies to all areas of learning and employment including recruitment, selection, training, deployment, career development, and promotion. These areas are monitored and policies and practices are amended if necessary to ensure that no unfair or unlawful discrimination, intentional, unintentional, direct or indirect, overt or latent exists.
3. The aim of this policy is to ensure CTP and its staff always remain compliant with the Equalities Act 2010 (**Please see Appendix A**) and all staff and learners are protected in line with the guideline set out in the Equalities Act 2010:

OUR COMMITMENT AS AN EMPLOYER

1. To create an environment in which individual differences and the contributions of our staff are recognised and valued.
2. Every employee, worker or self-employed contractor is entitled to a working or learning environment that promotes dignity and respect to all. No form of intimidation, bullying or harassment will be tolerated.
3. Training, development and progression opportunities are available to all staff.
4. Equality in the workplace is good management practice and makes sound business sense.
5. We will review all our practices and procedures to ensure fairness.

OUR COMMITMENT AS A SERVICE PROVIDER

1. We aim to provide services to which all learners are entitled regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation, offending past, caring responsibilities or social class.
2. We will make sure that our services are delivered equitably and meet the diverse needs of our service users and clients by assessing and meeting the diverse needs of our clients.

3. This policy is fully supported by senior management and has been agreed with employee representatives
4. This policy will be monitored and reviewed annually.
5. We have clear procedures that enable our learners, clients, candidates for jobs, employers and employees to raise a grievance or make a complaint if they feel they have been unfairly treated.
6. Breaches of our equality and diversity policy will be regarded as misconduct and could lead to disciplinary proceedings.

EQUAL OPPORTUNITY POLICY STATEMENTS

1. Age

We will:

- ensure that people of all ages are treated with respect and dignity;
- ensure that our staff are given equal access to our employment, training, development and promotion opportunities; and
- ensure that our learners are given equal access to our training and employment opportunities; and
- challenge discriminatory assumptions about younger and older people.

2. Disability

We will:

- provide any reasonable adjustments to ensure disabled people have access to our services and employment opportunities;
- challenge discriminatory assumptions about disabled people; and
- seek to continue to improve access to information.

3. Race

We will:

- challenge racism wherever it occurs;
- respond swiftly and sensitively to racist incidents; and
- actively promote race equality in the Company.

4. Gender

We will:

- challenge discriminatory assumptions about women and men;
- take positive action to redress the negative effects of discrimination against women and men;
- offer equal access for women and men to representation, services, employment, training and pay and encourage other organisations to do the same; and
- provide support to prevent discrimination against transsexual people who have or who are about to undergo gender reassignment.

5. Sexual Orientation

We will:

- ensure that we take account of the needs of lesbians and gay men; and
- promote positive images of lesbians, gay men and bisexuals.

6. Religion or Belief

We will:

- ensure that employees' religion or beliefs and related observances are respected and accommodated wherever possible; and
- respect people's beliefs where the expression of those beliefs does not impinge on the legitimate rights of others.

7. Pregnancy or Maternity

We will:

- Ensure that people are treated with respect and dignity and that a positive image is promoted regardless of pregnancy or maternity;
- challenge discriminatory assumptions about the pregnancy or maternity of our employees; and
- ensure that no individual is disadvantaged and that we take account of the needs of our employees' pregnancy or maternity.

8. Marriage or Civil Partnership

We will:

- Ensure that people are treated with respect and dignity and that a positive image is promoted regardless of marriage or civil partnership;
- challenge discriminatory assumptions about the marriage or civil partnership of our employees; and
- ensure that no individual is disadvantaged and that we take account of the needs of our employees' marriage or civil partnership.

9. Ex-Offenders

We will:

- prevent discrimination against our employees regardless of their offending background (except where there is a known risk to children or vulnerable adults).

MANAGERIAL RESPONSIBILITY

The responsibility for ensuring the effective implementation and operation of the arrangements will rest with the General Manager. Directors shall ensure that they and their staff operate within the policy and arrangements, and that all reasonable and practical steps are taken to avoid discrimination.

Each manager will ensure that:

- all staff are aware of the policy and the arrangements, and the reasons for the policy
- grievances concerning discrimination are dealt with properly, fairly and as quickly as possible
- proper records are maintained.

RESPONSIBILITY OF STAFF

The responsibility for ensuring that there is no unlawful discrimination rests with management and employees. Staff co-operation is crucial to the successful operation of fair employment practices. In particular, all members of staff should:

- comply with the policy and arrangements
- not discriminate in their day to day activities or induce others to do so
- not victimise, harass or intimidate other staff or groups
- inform the General Manager if they become aware of any discriminatory practice.

TRAINING

Regular staff training sessions will be held on Equality and Diversity issues. Equality and Diversity is also included within induction programmes.

Training will be provided on this policy and the arrangements for managers and staff. Staff members and managers who have an involvement in the recruitment and selection process will receive specialist training.

MONITORING

CTP considers it appropriate to state its intention not to discriminate and assumes that this will be translated into practice consistently across the organisation as a whole. Accordingly, a monitoring system will be introduced to measure the effectiveness of the policy and arrangements.

The system will involve the routine collection and analysis of information on employees by gender, marital status, ethnicity, qualifications, grade and length of service in current grade. Information regarding the number of staff who are registered as disabled will be maintained.

There will also be regular assessments to measure the extent to which recruitment to first appointment, internal promotion and access to training/development opportunities affect equal opportunities for all groups.

The information collected for monitoring purposes will be treated as confidential and it will not be used for any other purpose.

LEARNERS

CTP endeavours to provide an equal, diverse and fair learning environment for everyone. We attempt to create an inclusive learners community, in which all learners are encouraged whether they are able bodied or have a Disability* to study to their fullest potential.

We will regularly review learner's progress, at least every four weeks throughout each course and as a direct result, the feedback we receive may contribute to amending existing policies and procedures.



ADDITIONAL SUPPORT

We may be able to arrange additional support, dependent on your needs.

Additional Support may include

- adjustments by your tutors
- communication support
- note-taking support
- reader support
- help in carrying equipment you need for study

PHYSICAL ACCESS

CTP continuously try to improve its access for disabled employees, customers and learners. CTP endeavors to accommodate physical access as a major priority in all existing and new developments. Any new build plans will ensure we meet accessibility needs.

WHO DO I CONTACT

HR Manager, CTP Head Office, 2 Pelham Court, Pelham Road, Nottingham, NG5 1AP, Tel: 0115 646 1446 is the contact for any issues you may have. They will be able to give you advice on your requirements.

CONCERNS AND COMPLAINTS

If you are unhappy and wish to complain, you have the right to do so.

Please submit any concerns you have to HR Manager, CTP Head Office, 2 Pelham Court, Pelham Road, Nottingham, NG5 1AP, Tel: 0115 646 1446

GRIEVANCE / DISCIPLINE

Employees have a right to pursue a complaint concerning discrimination or victimisation via the Grievance or Harassment Procedures set out in the Employee Handbook. Breaches of this policy will lead to disciplinary proceedings and, if appropriate, disciplinary action.

Learners have a right to pursue a complaint concerning discrimination or victimisation by contacting the General Manager.

RELATED POLICIES & ARRANGEMENTS

All company policies and arrangements have a bearing on equality of opportunity. CTP policies will be reviewed regularly and any discriminatory elements removed.

REVIEW

To assess the effectiveness of its implementation, this policy and arrangements will be monitored and reviewed annually by the Director of Policies. Consideration will be given, if necessary, to adjusting this policy to afford greater equality of opportunities to all applicants, employees, customers and learners.

APPENDIX A

The information below is guidance from the Equality and Human Rights Commission (EHRC), with some examples from the Government Equalities Office.

The Equality Act 2010 brings together over 116 separate pieces of legislation into one single Act. Combined, they make up a new Act that provides a legal framework to protect the rights of individuals and advance equality of opportunity for all.

The Act simplifies, strengthens and harmonises the current legislation to provide Britain with a new discrimination law which protects individuals from unfair treatment and promotes a fair and more equal society.

The nine main pieces of legislation that have merged 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

1.0 Protected Characteristics

Protected characteristics (previously called “strands”) are definitions for groups of people given protection under the Equality Act 2010.

1.1 Age

A person belonging to a particular age (eg 32 year olds) or range of ages (eg 18 - 30 year olds).

1.2 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 that person's ability to carry out normal day-to-day activities. Long-term means that the disability has lasted or is likely to last for at least 12 months. Substantial means more than minor or trivial

1.3 Gender Reassignment

This is the process of transitioning from one gender to another. This transitioning process is a personal process, rather than a medical process, i.e. it does not require someone to undergo medical treatment in order to be protected. Transsexual refers to a person who has the protected characteristic of gender reassignment. It is important not to confuse gender reassignment with sexual orientation. A transsexual person can be a gay man, lesbian, heterosexual or bisexual

1.4 Marriage and Civil Partnership

Marriage is defined as a 'union between a man and a woman'. Same-sex couples can have their relationships legally recognised as 'civil partnerships'. Civil partners must be treated the same as married couples on a wide range of legal matters

1.5 Pregnancy and Maternity

Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

1.6 Race

Race refers to a group of people defined by their race, colour, nationality (including citizenship) and ethnic or national origins.

1.7 Religion or Belief

Religion means any religion and includes a lack of religion. A religion need not be mainstream or well-known to gain protection as a religion. However, it must have a clear structure and belief system. Belief means any religious or philosophical belief and includes a lack of belief. Generally, a belief should affect your life choices or the way you live for it to be included in the definition.

1.8 Sex

A male or a female.

1.9 Sexual Orientation

A person's sexual attraction towards persons of the same sex (ie a gay man or a lesbian), persons of the opposite sex (ie heterosexual) or persons of either sex (ie bisexual).

2.0 Discrimination, Harassment and Victimisation

The Equality Act 2010 gives protection to people who have, are perceived to have, or associate with someone who has a protected characteristic. It also gives protection against harassment and victimisation.

2.1 Direct Discrimination

Someone is treated less favourably than another person because of a protected characteristic.

An example of direct discrimination - A further education college rejects a male applicant's application to a childcare course as they do not think it is appropriate for a male to be working with children. This would be unlawful direct discrimination on the grounds of sex.

2.2 Direct Discrimination by Association

Someone is treated less favourably because they associate with another person who has a protected characteristic.

An example of direct discrimination by association - Julie applies to join a language class and discloses to the tutor that her boyfriend is Jewish, although she is not. The tutor then tells Julie that he made a mistake and the class is actually full. Subsequently, however, Julie discovers that others have been allowed to join the class after she was refused entry. The tutor's conduct is likely to amount to direct discrimination because of religion or belief as a result of Julie's association with her Jewish boyfriend

2.3 Direct Discrimination by Perception

Someone is treated less favourably than another person because others think they have a particular protected characteristic

An example of discrimination by perception - Rupert, a landlord, advertises a flat in a local paper and Ian meets Rupert to find out further details. Rupert assumes because of Ian's mannerisms and voice that Ian is a gay man, when he is in fact heterosexual. As Rupert does not want to rent his property to a gay man, he informs Ian that the flat is no longer on the market. This is direct discrimination because of sexual orientation, due to the landlord's perception that Ian is a gay man.

2.4 Indirect Discrimination

A rule or policy that applies to everyone, but disadvantages people with a particular protected characteristic.

An example of indirect discrimination - In a neighbourhood that includes a large Jewish community, a local community group provides lunches for elderly people but they say that because their supplier cannot provide kosher meals they are unable to provide meals for their Jewish customers. The policy not to provide kosher meals would disadvantage Jewish people in particular. The community group's policy not to provide kosher meals is unlikely to be justifiable since they could simply seek alternative suppliers that can supply kosher food.

2.5 Harassment

Someone behaves in such a way that their conduct has the purpose or effect of creating an environment that is offensive hostile, degrading, humiliating or intimidating, even if this behaviour is not directed at the person making a complaint.

An example of harassment – A member of staff makes a derogatory remark about a student going through gender reassignment. Another member of staff finds the tutor's remark offensive. The member of staff's derogatory remark would be harassment.

2.6 Victimisation

Someone is treated badly because they have made/supported a complaint or grievance under the Act.

An example of victimisation – An employee training project ran a seminar for unemployed people to help them prepare their CVs. Mehmet, a Muslim delegate, wrote to complain that he was not excused from the seminar to go and observe his afternoon prayers. The next time Mehmet applied to attend the seminar, he was told that there were no places left but he later found out that his friend had been given a place, even though he had applied later than Mehmet. Mehmet argued that this was victimisation because he had made a complaint related to his religion.

2.7 Discrimination arising from a disability

A disabled person is treated less favourably because of something connected to their impairment.

An example of discrimination arising from disability - A student with autism often speaks out of turn during tutorials which can create a disruptive atmosphere for the tutor and other students. Because of his behaviour, he is asked not to attend tutorials. This is likely to be discrimination arising from disability.

3.0 Reasonable Adjustment

The Equality Act 2010 requires reasonable adjustment to be made for someone with a disability. The duty to make reasonable adjustment comprises three requirements. For education providers, these requirements are to take reasonable steps to:

- avoid the substantial disadvantage where a provision, criterion or practice puts disabled students at a substantial disadvantage compared to those who are not disabled;
- remove or alter a physical feature or provide a reasonable means of avoiding such a feature where it puts disabled students at a substantial disadvantage compared to those who are not disabled;
- provide an auxiliary aid where disabled students would, but for the provision of such an auxiliary aid, be put at a substantial disadvantage compared to those who are not disabled.

4.0 Positive Action

4.1 Positive action means offering targeted assistance to people so that they can take full and equal advantage of particular opportunities. Putting it another way, positive action means taking action to ensure that all groups of people have equal opportunity of access to the College's services. Positive action is optional, not a requirement. Positive action is lawful.

4.2 Positive action is not the same as positive discrimination. Positive discrimination means explicitly treating people more favourably on the grounds of a protected characteristic. Positive discrimination is unlawful except in the case of disability. In The case of disability positive discrimination is lawful as long as it is appropriate to achieve equality of opportunity between disabled people with different impairments.