



Equality, Diversity & Inclusion Policy

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1. Introduction

Skills4Group is the trading name of I & F Limited. Skills4Group provides apprenticeship training and related education across pharmacy, dental, science and other specialist provision, working with learners, employers and partner organisations.

Skills4Group is committed to securing genuine equality of opportunity in all its activities as an employer and training provider. We aim to create an environment where everyone is treated with dignity and respect, can participate fully and has the opportunity to achieve their potential.

This policy applies to employees, workers, directors, job applicants, learners, contractors, agency workers and volunteers. It also sets out our expectations of employer partners, customers, suppliers and visitors.

It covers recruitment, employment terms, pay, induction, training, promotion, performance management, working arrangements, learner enrolment, curriculum delivery, assessment, learner support, progression, complaints and the ending of employment or other engagement.

The policy applies to conduct in person, online, during remote working, at employer premises, during work-related travel and at work-related events.

The nine protected characteristics under the Equality Act 2010 are:

- Age.
- Disability.
- Gender reassignment.
- Marriage and civil partnership.
- Pregnancy and maternity.
- Race, including colour, nationality and ethnic or national origins.
- Religion or belief, including lack of religion or belief.
- Sex.
- Sexual orientation.

The legal protections applying to particular characteristics vary according to the circumstances. Skills4Group's commitment to fair treatment and respectful behaviour applies across all its activities.

This policy covers all Skills4Group provision, including publicly funded programmes. Relevant actions will be incorporated into the Equality and Diversity Development Plan, Quality Improvement Plans and other organisational action plans.

The policy will be communicated to staff, learners and relevant stakeholders and made available in alternative formats on request.

Purpose

The purpose of this policy is to:

- Support compliance with equality legislation and relevant guidance.
- Promote fair access to employment, learning and progression.
- Identify and remove unnecessary barriers.
- Prevent discrimination, harassment, sexual harassment, bullying and victimisation.
- Ensure that reasonable adjustments and appropriate support are considered and implemented.
- Provide clear responsibilities and routes for raising concerns.
- Use evidence and feedback to improve our practices.

Our commitment

- Every employee and worker is entitled to a working environment that promotes dignity and respect.
- Every learner is entitled to an inclusive learning environment and appropriate support to participate, progress and achieve.
- Applicants should experience recruitment and enrolment processes based on relevant criteria and free from unnecessary barriers.
- Employment, training and progression opportunities will be managed fairly.
- Reasonable adjustments will be made where required to remove or reduce disability-related disadvantage.
- Staff will receive relevant information, training and support to put this policy into practice.

- Managers will monitor the fairness of decisions and address inappropriate behaviour promptly.
- Concerns will be taken seriously and handled sensitively through the appropriate procedure.

2. Policy

Principles

Our values guide how we put equality, diversity and inclusion into practice:

- **Supportive:** We invest in colleagues, learners and employers, creating a collaborative environment where people can succeed.
- **Strategic Growth:** We seek innovation, expansion and better methods that improve our offer.
- **Sustainability:** We focus on long-term impact for learners, employers and the sectors we serve.
- **Service Excellence:** We prioritise learner and employer success through accessible, high-quality training.

Fair treatment does not always mean treating everyone in exactly the same way. Different support or adjustments may be necessary to give people a fair opportunity to participate and succeed.

British Values

Skills4Group promotes fundamental British Values through learner induction, the learner handbook, teaching, reviews and wider organisational activity:

- Democracy.
- The rule of law.
- Individual liberty.
- Mutual respect and tolerance of those with different faiths and beliefs.

Staff will encourage respectful discussion and appropriately challenge discriminatory, abusive or harmful behaviour.

Lawful differences of opinion and protected beliefs must be treated respectfully. Concerns about radicalisation or a risk of harm will be referred through the Safeguarding and Prevent procedures.

Recruitment, employment and progression

Recruitment, selection, promotion and progression decisions will be based on objective criteria relevant to the role.

Job descriptions, advertisements, application processes, interviews and assessments must avoid unnecessary requirements that could exclude suitable candidates.

Managers and recruiters must:

- Assess candidates against the agreed criteria.
- Offer applicants an opportunity to request adjustments.
- Avoid assumptions about a person's health, disability, age, pregnancy, caring responsibilities, background or other personal circumstances.
- Follow legal restrictions on pre-employment health and disability questions.
- Record the reasons for recruitment and progression decisions appropriately.
- Keep equality monitoring information separate from selection decisions wherever practicable.

Pay, benefits, training, development, performance management and access to opportunities will be managed fairly and consistently, taking account of individual circumstances and any required adjustments.

Managers must seek HR advice where a decision may create an equality concern.

Learner journey

Equality, diversity and inclusion will be embedded throughout learner recruitment, enrolment, induction, teaching, progress reviews, assessment, employer engagement and progression.

Skills4Group will:

- Identify learning and accessibility needs as early as possible.
- Use inclusive language, examples and learning resources.
- Provide accessible formats and appropriate support.
- Encourage participation and respectful discussion.
- Review barriers affecting attendance, progress, retention or achievement.
- Work with employer partners to support inclusive workplace learning.
- Address discriminatory behaviour and escalate safeguarding concerns promptly.

Assessment adjustments will be considered in line with applicable awarding organisation requirements and legal duties, while maintaining the relevant competence standards.

Reasonable adjustments and accessibility

Skills4Group will make reasonable adjustments where required to remove or reduce substantial disadvantage experienced by disabled applicants, employees, workers and learners.

Adjustments may include:

- Accessible documents and communication methods.
- Assistive technology or equipment.
- Changes to working arrangements, duties or processes.
- Adjustments to recruitment and assessment methods.
- Additional breaks or flexibility.
- Accessible teaching resources and learning environments.
- Additional support, mentoring or alternative ways to participate.

Requests may be raised with HR, a line manager, the recruitment contact, a tutor, learner support or another appropriate contact.

The person affected will be involved in discussions about their needs. Relevant professional advice may be sought where appropriate and with the necessary consent.

Staff should not wait for a formal diagnosis before discussing practical support where a disadvantage has been identified.

Agreed adjustments must be recorded, communicated only to those who need to implement them and reviewed for effectiveness. If a proposed adjustment cannot be agreed, the reasons and possible alternatives must be discussed and documented.

Preventing harassment and bullying

Skills4Group will take all reasonable steps to prevent sexual harassment and address risks of harassment involving colleagues and third parties, including learners, customers, employer partners and visitors.

Preventative measures will include:

- Assessing risks arising from working arrangements and contact with others.
- Setting clear standards of behaviour.
- Providing appropriate training.
- Maintaining accessible reporting routes.
- Responding promptly to concerns.
- Reviewing incidents and feedback to improve preventative measures.

Behaviour described as humour, banter or normal workplace practice may still be unacceptable. A person does not have to object at the time for conduct to be considered under this policy.

Further arrangements are set out in the relevant harassment and bullying policies.

Complaints and raising concerns

Anyone who experiences or witnesses discrimination, harassment, bullying, victimisation or an accessibility barrier is encouraged to raise it promptly.

Concerns may be raised with:

- A line manager or another manager.
- HR.
- A tutor or assessor.
- Learner support or Quality.
- The Safeguarding team.
- A senior leader.
- The relevant complaints, grievance or whistleblowing route.

A person does not have to raise the concern with the individual whose behaviour is in question. Informal resolution will only be used where appropriate; it will not be a compulsory first step.

Skills4Group will:

- Consider any immediate safeguarding, wellbeing or retaliation risks.
- Establish the relevant facts fairly.
- Give those involved an appropriate opportunity to respond.
- Explain the procedure and likely timescales.
- Consider support and adjustments needed during the process.
- Record decisions and communicate outcomes as appropriate.
- Explain any applicable review or appeal route.

Information will be shared only where necessary. Confidentiality will be protected as far as possible, but absolute confidentiality or anonymity cannot be guaranteed.

No one should suffer retaliation for raising an honestly held concern, supporting another person or participating in an investigation. A complaint that is not upheld will not, for that reason alone, be treated as false or malicious.

Safeguarding concerns must be referred promptly under the Safeguarding Policy. Immediate danger should be addressed through the appropriate emergency arrangements.

Objectives of the policy

Skills4Group will:

- Report relevant equality and inclusion themes to the Board and Senior Leadership Team.

- Review participation, experience and outcomes to identify barriers.
- Consider equality impacts when developing or changing policies and services.
- Provide relevant staff training and development.
- Seek feedback from learners, employees and stakeholders.
- Assign owners and deadlines to improvement actions.
- Review whether actions have improved access, participation and outcomes.
- Consider lawful positive action where evidence identifies disadvantage, different needs or underrepresentation.

Positive action must be proportionate and comply with the Equality Act 2010. It must not be used as a basis for unlawful preferential treatment or automatic selection.

Statutory Acts and guidance

This policy is informed by relevant legislation and guidance, including:

- Equality Act 2010, as amended.
- Equality Act 2006.
- Worker Protection (Amendment of Equality Act 2010) Act 2023.
- Employment Rights Act 1996, as amended.
- Employment Rights Act 2025, where relevant provisions are in force.
- Human Rights Act 1998, where applicable.
- UK General Data Protection Regulation and Data Protection Act 2018, as amended.
- Relevant Acas and Equality and Human Rights Commission guidance.
- Applicable safeguarding, Prevent, funding and awarding organisation requirements.

The policy will be reviewed when relevant legal or regulatory requirements change.

Equal Opportunities Statement

Skills4Group is committed to being an equal opportunities employer and training provider.

We will communicate this commitment, provide relevant training, maintain fair procedures and involve staff, learners and stakeholders in improving our practices.

Discrimination, harassment, sexual harassment, bullying and victimisation will be addressed through the appropriate procedure. Depending on the findings and circumstances, action may include support, training, changes to working or learning arrangements, disciplinary action or action under learner and partner procedures.

3. EDI Monitoring

Skills4Group will use proportionate monitoring to understand whether people can access opportunities, participate fully and achieve fair outcomes.

Monitoring may include:

- Recruitment and enrolment.
- Access to training and development.
- Learner attendance, participation, retention and achievement.
- Employee and learner progression.
- Promotion, pay and access to opportunities.
- Accessibility and adjustment requests.
- Complaints, grievances and disciplinary themes.
- Flexible working, absence and turnover patterns.
- Feedback from staff, learners and employer partners.

Differences in outcomes will prompt investigation and discussion. They will not automatically be treated as proof of discrimination or attributed to an individual's characteristics.

Examples of issues and potential responses

Issue	Example	Potential response
Underrepresented groups	Some groups are underrepresented in applications, employment or programmes.	Review outreach, advertising, entry criteria and application routes. Consider lawful positive action where supported by evidence.
Disparities in progression	Progress, retention or achievement differs between groups.	Investigate possible barriers and review support, delivery and employer engagement.
Inaccessible learning materials	Resources are difficult to access or use.	Provide alternative formats and improve accessibility, clarity and representation.
Unequal participation	Some people participate less in learning, meetings or development opportunities.	Review timing, format, accessibility and the environment for participation.
Employment disparities	Patterns emerge in recruitment, promotion, pay or access to development.	Review decision-making criteria, evidence, adjustments and manager training.

Recurring complaints

Concerns indicate repeated issues with exclusion, behaviour or accessibility.

Investigate, address the causes, review controls and monitor whether changes are effective.

Information handling

Equality monitoring information will be collected only for a defined purpose and with an appropriate lawful basis. Additional legal conditions will be identified where special category information is processed.

Individuals will be told why information is requested, how it will be used and whether providing it is optional or required.

Records must be accurate, secure and accessible only to authorised people. Reporting will use aggregated or anonymised information wherever possible, with care taken to avoid identifying individuals within small groups.

Information will be retained and disposed of in accordance with the organisation's retention arrangements.

Action planning and review

Monitoring findings will inform the Equality and Diversity Development Plan, Quality Improvement Plans and relevant management actions.

Each action should identify:

- The barrier or issue.
- The evidence considered.
- The agreed response.
- The responsible owner.
- The completion deadline.
- How progress and effectiveness will be reviewed.

The Board and Senior Leadership Team will receive appropriate reports on themes, risks and progress.

4. Definitions

Equality

Ensuring people have fair opportunities and are protected from unlawful discrimination. This may require different support or adjustments to address disadvantage.

Diversity

Recognising and respecting the different backgrounds, identities, experiences, perspectives and abilities that people bring.

Inclusion

Creating working and learning environments where people feel respected, can participate and can access opportunities.

Direct discrimination

Treating a person less favourably because of a protected characteristic, subject to the specific provisions and exceptions in the Equality Act 2010.

Indirect discrimination

Applying a provision, criterion or practice that puts people sharing a protected characteristic at a particular disadvantage, and disadvantages the individual concerned, where it cannot be justified as a proportionate means of achieving a legitimate aim.

Discrimination by association

Discrimination because of a person's association with someone who has a protected characteristic, where the relevant legal protection applies.

Discrimination by perception

Discrimination because someone is believed to have a protected characteristic, whether or not they actually have it, where the relevant legal protection applies.

Discrimination arising from disability

Treating a disabled person unfavourably because of something arising from their disability, where the legal conditions are met and the treatment cannot be objectively justified.

Failure to make reasonable adjustments

Failing to take reasonable steps required by law to remove or reduce substantial disadvantage experienced by a disabled person.

Harassment

Unwanted conduct related to a relevant protected characteristic that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.

The person affected does not necessarily have to possess the characteristic or be the intended target. Legal coverage varies according to the characteristic and context.

Sexual harassment

Unwanted conduct of a sexual nature that has the purpose or effect of violating dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.

Unfavourable treatment because someone rejected or submitted to certain forms of harassment is also prohibited by the Equality Act.

Bullying

Offensive, intimidating, malicious or insulting behaviour, or an abuse or misuse of power that undermines, humiliates or harms another person.

Bullying can occur in person or through written, telephone or online communications. It may be a single incident or a pattern and does not have to relate to a protected characteristic to breach this policy.

Victimisation

Subjecting someone to a detriment because they have done, or are believed likely to do, a protected act under the Equality Act 2010. Protected acts include making an allegation of discrimination or providing evidence or information in connection with the Act.

Positive action

Lawful and proportionate action to address disadvantage, meet different needs or increase participation among people sharing a protected characteristic, where the statutory conditions are met.

Implementation

The Board has overall oversight of this policy. The Managing Director provides strategic leadership, supported by the Senior Leadership Team.

Responsibilities are as follows:

Role	Responsibility
Board and Senior Leadership Team	Approve the policy, provide oversight and resources, review significant risks and monitor progress.
Managing Director	Champion equality, diversity and inclusion and ensure responsibilities are assigned.
HR	Support fair employment practices, advise managers, coordinate relevant training and manage employment concerns and records.
Quality and Operations	Embed inclusion in programme design, delivery, assessment, learner support and quality improvement.
Managers	Apply the policy fairly, consider equality impacts, implement adjustments and address concerns promptly.
Tutors and assessors	Provide inclusive learning, identify barriers, support adjustments and report concerns.
Safeguarding and learner support teams	Provide specialist support and manage concerns within their responsibilities.
Employees and workers	Treat others respectfully, complete relevant training, follow agreed arrangements and cooperate with appropriate enquiries.
Learners and partners	Follow relevant standards of behaviour, respect others and raise concerns through the appropriate routes.

Managers and staff dealing with a concern should:

1. Identify the issue and any immediate risk.
2. Gather relevant information without making assumptions.
3. Consider barriers, adjustments and the appropriate procedure.
4. Seek HR, Quality or Safeguarding advice where needed.
5. Agree actions, responsibilities and timescales.
6. Record the decision and its reasons.
7. Review whether the action has resolved the concern.

This policy will be reviewed at least annually and sooner where legislation, guidance, organisational changes, incidents, complaints or audit findings indicate a need.

5. Related Policies

This policy should be read alongside the organisation's current:

- Recruitment and Selection Policy.
- Reasonable Adjustments Policy.
- Flexible Working Policy.
- Anti-Bullying and Harassment Policy.
- Sexual Harassment Policy.
- Staff Code of Conduct.
- Complaints Procedure.
- Grievance Procedure.
- Disciplinary Policy.
- Safeguarding Adults and Children Policy.
- Prevent and Radicalisation Policy.
- Learner Behaviour Policy.
- Learner handbook and enrolment procedures.
- GDPR and Data Protection Policy.
- Whistleblowing Policy.
- Relevant assessment and learner-support procedures.