

Equality and Diversity Policy

Document Control	
Document Type:	Policy
Department:	Quality
Relevancy:	Total People
Author/Owner:	Sophie Hayes
Approver:	Melanie Nicholson
Version:	6.1
Security Classification:	Internal & External
Last Review Date:	30/06/2025
Next Review Date:	31/07/2026

Policy Statement:

Total People is committed to creating and maintaining an inclusive working and learning environment that respects and celebrates difference, an environment where everyone feels able to fully participate in their work and / or their learning programme and achieve their full potential.

As an employer Total People aims to ensure that all job applicants, colleagues and agency workers receives fair treatment.

Total People will proactively seek to eliminate discrimination and advance equality on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief (including no belief), sex and sexual orientation and to fostering good relations between different groups.

Mission:

Total People is committed to:

- Creating and maintaining a culture where everyone understands their responsibility for and promotes equality of opportunity, and their role in fostering good relations between people and between different groups
- Promoting a fully inclusive culture that celebrates, supports, attracts and values diversity
- Proactively tackling the barriers to equality and work to eliminate bias (conscious or unconscious), discrimination, harassment, and victimisation
- Being compliant with all relevant legislation
- Ensuring that apprentices/learners achieve their potential free of barriers to their progress
- Ensuring that teaching, learning and assessment practices and resources promote equality, raise awareness of diversity, and tackle discrimination, victimisation, and stereotyping
- Developing and maintaining knowledge of the legislation and best practice
- Recruiting, retaining and developing its employees based on merit, competence and potential
- Providing a positive work environment
- Promoting apprentice/learner and staff wellbeing that proactively supports mental health

Scope:

Everyone has a role to play in implementing this policy. The Policy applies to all those working in, learning at or visiting Total People, including apprentices/learners, Total People Colleagues, Governors, volunteers and visitors to Total People, including contracted services such as agency staff, employers offering work placements, employers employing apprentices. The policy applies in the same way to Total People's supply chain partners.

Legislation, Guidance and Relevant Policies:

This policy is aligned to the following pieces of legislation and guidance, in addition to LTE Group Policies to ensure practices meet legislative requirements and best practice.

- The Equality Act and the Public Sector Equality Duty (2010)
- Worker Protection Act 2023 (Part of Equality Act)
- Rehabilitation of Offenders Act 1974

All colleagues must read this Equality and Diversity Policy in conjunction with the policies listed below and ensure they are familiar with their roles and responsibilities within each of these policies.

- Behaviour Management Policy and Learner Deal
- Attendance Policy
- LDD and access arrangement guidance
- ARC behaviours / staff conduct
- QTLA (Quality of Teaching Learning and Assessment, including observation of practice)
- Complaints Policy
- Disciplinary Policy
- Recruitment Policy
- Safeguarding and Child protection Policy
- Prevent policy

Roles and Responsibilities:

Board

- Total People Board have overall responsibility for Equality, Diversity and Inclusion
- TP Board receive the annual Gender Pay Gap Report where appropriate, and the annual Equality and Diversity Action Plan update from Total People for scrutiny and assurance.

Managing Director

- Lead Total Peoples Equality and Diversity strategy
- Lead Total Peoples Equality and Diversity policies/procedures against Legislation
- Drive collaboration with stakeholders and wider partners to further enhance our commitment to equality, diversity, and inclusivity
- Implement and consider the Equality and Diversity Policy when recruiting, delivering apprenticeship training, and working with employers and apprentices
- Lead on the new duty under the Equality Act 2010 that requires employers to take "reasonable steps" to prevent sexual harassment of their employees
- Lead on the clarification by the UK Supreme Court of the legal definition of woman/man being based on biological sex

Deputy Managing Director & Senior Leadership Team

- Embed Total Peoples Equality and Diversity Strategy and policies
- Ensure all staff complete and comply with mandatory Equality and Diversity training
- Ensure staff adhere to Equality and Diversity CPD plans
- Implement and consider the Equality and Diversity Policy when recruiting, delivering apprenticeship training, and working with employers and apprentices.
- Ensure that Total People's physical estate offers safe and inclusive spaces which meet staff and apprentices/learner needs
- Define key goals and performance indicators to assess the effectiveness of the implementation of this policy for apprentices/learners

Quality Team

- Implement and consider the Equality and Diversity Policy when recruiting, delivering apprenticeship training, and working with employers and apprentices.
- Set areas for improvement at an organisational level as part of the annual self-assessment and quality improvement planning process
- Embed Equality and Diversity into the quality monitoring cycle (Quality Review)
- Ensure that effective improvement plans are in place to address any apprentices/learner related performance issues relating to Equality and Diversity at organisational level

- Analyse/track/monitor Equality and Diversity apprentice/learner data at an organisational level
- Report to SLT

Head of Learner Experience and EDI Lead

- Ensure that the promotion of Equality and Diversity is fully embedded into teaching and learning practice and the curriculum
- Ensure that Equality and Diversity is fully embedded into policies and procedures for apprentice/learner assessment, support and access
- Ensure that EDI and the values of the LTE group and Total People are shared with staff on each staff induction
- Ensure that new starters are reminded of the induction checklist and probation process at their induction, and links to the Code of Conduct and prevent sexual harassment of employees are made
- Implement and consider the Equality and Diversity Policy when recruiting, delivering apprenticeship training, and working with employers and apprentices.
- Support Curriculum and Performance Managers to develop CPD and improvement plans for Learning Coaches
- Share and review EDI data based on the EDIM action plan and update plan accordingly
- Review EDIM action plan and update the key objectives set around access arrangements, SEND training and wider LDD provision.
- Provide training and support to relevant managers in relation to completing Equality Impact Assessments (EIA)

Curriculum and Performance Managers

- Implement and consider the Equality and Diversity Policy when recruiting, delivering apprenticeship training, and working with employers and apprentices.
- Ensure that the promotion of Equality and Diversity is fully embedded into teaching and learning practice and the curriculum
- Ensure all staff complete and comply with mandatory Equality and Diversity training
- Ensure staff adhere to Equality and Diversity CPD plans
- Analyse/track/monitor Equality and Diversity apprentice/learner data at cluster level
- Ensure that effective improvement plans are in place to address any apprentices/learner related performance issues relating to Equality and Diversity at cluster level
- Utilise EDI data provided to review provision for learners based on the 9 Protected characteristics and LDD so that they receive the appropriate support
- Participate in the completion of Equality Impact Assessments where appropriate.

Learning Coaches

- Implement and consider the Equality and Diversity Policy when recruiting, delivering apprenticeship training, and working with employers, apprentices and learners.
- Ensure that the promotion of Equality and Diversity is fully embedded into day-to-day teaching and learning practice and that these align to the values/code of conduct and British Values as key parts of EDI.
- Adhere to Equality and Diversity CPD plans
- Support all learners through initial assessments/reviews/meetings so that their LDD needs are met

HR

- Implement and consider policies and enable practice which promotes equality and diversity in staff recruitment, retention, and development
- Procurement and promotion of staff well-being and mental health services
- Annual presentation of the Gender Pay Gap report, where appropriate
- Procedures for Staff Grievance, Capability, Absence and Disciplinary
- Monitoring of workforce diversity
- Remaining committed to paying the real living wage to all employees
- Support for Managers around the new Code of Conduct policy 2025
- Monitor training/data under the new duty of the Equality Act 2010 that requires employers to take “reasonable steps” to prevent sexual harassment of their employees
- Monitor any incidents of harassment/victimisation of trans, males, and females based on the clarification by the UK supreme Court 2025

IT Services

- IT acceptable use policies/procedures

Business Development Marketing

- Promote apprentice/ learner and employer recruitment which is inclusive and aligned to this policy
- Support employers to understand and implement this policy for Total People apprentices/learners
- Social Media policy and guidance
- Social Media and news monitoring and tracking
- Use of marketing literature, publicity materials, public displays, signage, and visual imagery that promote inclusivity
- Promotion and delivery of Equality and Diversity campaigns/messages

All Total People Employees

- Implement and consider the Equality and Diversity Policy when recruiting, delivering apprenticeship training, and working with employers and apprentices.
- Read, understand and fully implement responsibilities within this policy
- Compliance with TP mandatory CPD training (within allocated timescales)
- Promote professional conduct/behaviour in all working practices including that of recognising the biological definition of sex whilst ensuring other protected characteristics are not discriminated against
- Know and understand when and how to report a concern relating to Equality and Diversity
- Challenge conduct/behaviour, which is not aligned to this Policy, escalating concerns to your line manager where appropriate
- Work to the new duty under the Equality Act 2010 that requires all staff to take “reasonable steps” to prevent sexual harassment of colleagues

Policy Awareness, Implementation and Training:

Colleagues

- Mandatory training module as part of colleague induction
- Refresher mandatory training on an annual basis

- Read and understand this policy at induction (confirmed through colleague induction checklist), and following a policy review
- Shadowing activities for Learning Coaches organised by Curriculum and Performance Managers at Induction
- Support through the Teaching and Learning team, where a CPD need is identified
- Embedding Equality and Diversity best practice shared through Communities of Practice

Apprentices/Learners

- Policy overview at Induction
- Apprentice/learner commitment statement
- Enrichment courses made available through OneFile virtual learning platform

Employers

- Policy overview at opportunity stage
- Commitment statement

Promoting, Engagement and gaining Commitment to the Policy:

Total People will ensure that this Equality and Diversity Policy is promoted, and that engagement and commitment gained via the following activities. This is not an exhaustive list, as other mechanisms will be used as and when the situation arises.

This policy will be agreed by the Total People board of governors with promotion, engagement and commitment to this policy gained through:

- Staff Induction/Training/CPD/Online learning modules
- Team meetings and 1-2-1 meetings
- Intranet/Hub section on Equality and Diversity, and what it means for staff and apprentices/learners
- Visible media in and around office and employer locations
- Learning resources for all apprentices and other learners
- Email headers and footers
- Apprentice/learner reviews – carried out on an 8-weekly basis.
- Equality Impact Assessments being carried out when carrying substantive changes such as policies and curriculum changes
- Bimonthly newsletters, monthly email communications and regular all colleague briefings that relay messages on EDI, mental health and safeguarding
- LTE group mental health and wellbeing strategy that incorporates seeking staff views including from Mental Health First Aiders
- LTE group Equality and Diversity Report, published on Total People and MOLs website

We will ensure that we measure the engagement and commitment within Total People to this Equality and Diversity Policy by:

- Monitoring the outcomes from online and interactive training for both staff and apprentices/learners
- Ensuring updates to are effectively communicated to colleagues, learners, and employers
- Managers will produce evidence (e.g. meeting notes) staff training and 1-2-1 reviews and through the annual appraisal process that this policy has been discussed
- Monitoring of learner review documentation

- Monitoring specific responses to Equality and Diversity in learner and employer surveys
- Through our use of internal quality checks and reviews and through audits checks.

Subcontractors:

Total People's partnership team are responsible for completing required due diligence checks and for the on-going monitoring of quality & compliance. Subcontractors will have their own policies and procedures in relation to Equality and Diversity but are also expected to comply with Total People Policy.

Subcontractor roles & responsibilities:

- Equality and Diversity Policies and Procedures in place which meet all legislative requirements, and which detail:
 - The policy review cycle, including who is responsible for update and sign off
 - The last and next review date, and the version number
 - What approach will be taken to training colleagues, apprentices/ learners, employers, visitors, and stakeholders in raising awareness of and implementing the policy
 - How implementation of the policy will be monitored and continuously improved

Data Collection, Analysis, and Continuous Improvement


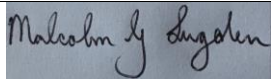
Total People understand that continuous improvement is vital to effective practice. We do this by:

- Ensuring that sufficient data is captured to enable identification of best practice as well as gaps in apprentices/learner recruitment, attendance, retention, achievement, progress and destination
- Gather apprentices/learner feedback which enables the identification of best practice and drive decision making relating to our offer and delivery
- Gather feedback from employers, subcontractors and stakeholders which enable improvements to be made to how we promote awareness and implementation of this policy
- Ensure that mechanisms are in place to gather feedback from employees relating to Equality and Diversity, well-being, and mental health
- Undertake analysis of labour market data to ensure that our offer remains relevant and up to date
- Undertake analysis of external performance data to enable appropriate goals and improvement actions to be set at organisational/cluster/product level as appropriate
- Analysing and evaluating our Equality and Diversity data through the Quality Review cycle and annual self-assessment to identify common trends, patterns or concerns and use this to inform changes to practice, resources and training we provide
- Completing an annual self-assessment against Ofsted's Education Inspection Framework and Quality Improvement Plan
- Provide CPD for colleagues
- Provide a forum for colleagues to explore and share best practice in relation to teaching, learning & assessment (Colleague Learning Community at Total People)

Signatures & Review:

This policy is published on Total People's website and Total People's internal Hub. The policy is shared with all colleagues through induction training and mandatory refresher training as per the published training matrix. Updates to policies are also communicated through email

communications, monthly newsletters, cluster meetings and all colleague calls. This policy is reviewed annually, or in response to updates and changes to relevant legislation and guidance, whichever is sooner.

	Name	Position	Signature
Approver:	Melanie Nicholson	Managing Director Total People	
Board Approver:	Malcolm Sugden	Chair of Total People Board	
Version:	6.1		