Equality, Diversity, and Inclusion Policy

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Policy Statement:

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

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

Total People will proactively seek to eliminate discrimination, advance equality on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation, and foster good relations between different groups.

Total People recognises that effective inclusion is anti-discriminatory and anti-racist. Colleagues should understand and be sensitive to the ways in which economic and social circumstances, ethnicity, disability and other protected characteristics may affect colleagues', apprentices', learners' and families' experiences, access to support and outcomes.

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 barriers to equality and working to eliminate bias, whether 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
- Promoting Equality, Diversity and Inclusion alongside British Values, including democracy, the rule of law, individual liberty, mutual respect and tolerance, so that apprentices and learners can explore different views respectfully and challenge discrimination, prejudice and stereotyping safely and appropriately.

- Developing and maintaining knowledge of the legislation and best practice
- Recruiting, retaining and developing colleagues based on merit, competence and potential
- Providing a positive work environment
- Promoting apprentice/learner and colleague wellbeing, including support for mental health where appropriate

Scope:

Everyone has a role to play in implementing this policy. It applies to everyone working in, learning with or visiting Total People, including apprentices and learners, Total People colleagues, Governors, volunteers, visitors, agency staff, employers offering work placements, employers of apprentices and contracted services. It also applies to Total People's supply chain partners.

This policy applies across all Total People sites, offices, employer workplaces, subcontractor delivery locations, online learning environments and any other setting where Total People learning, assessment, support or work-related activity takes place.

Inclusion means actively removing barriers so that colleagues, applicants, apprentices and learners can participate, feel that they belong, access the right support and achieve their full potential. Total People will use the term Equality, Diversity and Inclusion (EDI) throughout this policy to reflect our commitment to fair treatment, respect, participation and positive outcomes for everyone.

Legislation, Guidance and Relevant Policies:

This policy is also informed by current further education and skills inspection expectations, statutory duties and relevant equality guidance. Total People will review this policy at least annually, and sooner where legislation, statutory guidance, inspection expectations or organisational arrangements change.

This policy is aligned to the following legislation and guidance, in addition to LTE Group policies, to ensure that practice meets 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
- Further Education and Skills Inspection Toolkit, operating guides and inspection information, including the version for use from September 2026

- Education and Inspections Act 2006
- Human Rights Act 1998
- Data Protection Act 2018 and UK GDPR
- Children and Families Act 2014, where this relates to SEND support, Education, Health and Care Plans, reasonable adjustments and inclusive access to learning
- Equality and Human Rights Commission guidance and statutory codes of practice, including technical guidance for further and higher education providers

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

- Learner Support Policy (SEND)
- Behaviour Management Policy and Learner Deal
- Attendance Policy
- LTE values and behaviour framework
- QTLA (Quality of Teaching Learning and Assessment, including observation of practice)
- Complaints Policy
- Disciplinary Policy
- Recruitment Policy
- Safeguarding and Child Protection Policy
- Prevent Policy

Public Sector Equality Duty and Reasonable Adjustments:

Total People will have due regard to the Public Sector Equality Duty when carrying out its functions. This means we will consider the need to eliminate discrimination, harassment and victimisation, advance equality of opportunity and foster good relations between people who share a protected characteristic and those who do not.

Total People will encourage applicants, colleagues, apprentices and learners to disclose disabilities, learning difficulties, health conditions or other support needs confidentially, so that reasonable adjustments can be considered as early as possible. Adjustments will be considered on an individual basis and may relate to recruitment, learning, assessment, communication, access arrangements, digital systems, premises, support processes or other relevant services, with the aim of reducing barriers and supporting safe, fair and inclusive access to work and learning.

Inclusive FE Practice:

Leaders, managers and delivery colleagues will use learner data, learner voice, support needs, attendance, progress, achievement, destinations and complaints to identify barriers to access, participation and outcomes.

Where data or feedback shows under-representation, barriers or differences in learner experience or outcomes, Total People may consider proportionate positive action within the scope of the Equality Act 2010.

Actions will be recorded and monitored through appropriate quality assurance routes, including self-assessment, quality improvement planning, EDI action planning, curriculum reviews, learner support planning and governance reporting.

Reporting Discrimination, Harassment, Sexual Harassment and Victimisation:

Total People expects all colleagues, apprentices, learners, employers, visitors and subcontractors to treat each other with dignity and respect. Discrimination, harassment, sexual harassment, bullying and victimisation will not be tolerated.

Concerns should be reported as soon as possible using the most appropriate route:

- colleagues should speak to their line manager, HR, a member of SLT or the Head of Learner Experience;
- apprentices and learners should speak to their Learning Coach, a trusted colleague, the Head of Learner Experience or use the published reporting routes;
- employers, visitors and subcontractors should speak to their Total People contact or the relevant manager.

Where a concern involves risk of harm, abuse, exploitation, learner welfare or safeguarding, Total People's safeguarding reporting routes must be followed without delay.

Concerns will be reviewed proportionately, sensitively and in a timely way. Information will only be shared with those who need to know. Total People will take reasonable steps to prevent sexual harassment and will take appropriate action where concerns are upheld or further support is required.

Sex, Gender Reassignment and Inclusive Practice:

Total People will comply with the Equality Act 2010, current guidance and statutory codes of practice from the Equality and Human Rights Commission (EHRC), and any relevant statutory

codes of practice. We will continue to protect people from discrimination, harassment and victimisation because of sex, gender reassignment or any other protected characteristic.

Total People will promote dignity, privacy, safety and respectful language for all colleagues, applicants, apprentices and learners. Where questions arise about facilities, support, adjustments, privacy or safety, these will be considered carefully and on a case-by-case basis, taking account of legal duties, individual needs, safeguarding, health and safety and the need to maintain an inclusive environment.

Roles and Responsibilities:

Board

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

Managing Director

- Provide strategic leadership for Equality, Diversity and Inclusion across Total People.
- Ensure EDI objectives agreed with LTE Group are reflected in Total People's strategic priorities and governance reporting.
- Ensure Total People maintains effective EDI policies and procedures that reflect current legislation, guidance and organisational responsibilities.
- Drive collaboration with stakeholders and wider partners to further enhance our commitment to equality, diversity and inclusion.
- Ensure this policy is considered in strategic decisions, workforce planning, learner experience, employer engagement and organisational development.
- Ensure organisational arrangements are in place to meet the duty to take reasonable steps to prevent sexual harassment, with advice and support from LTE HR Shared Services where required.
- Ensure Total People responds appropriately to current legal guidance on sex, gender reassignment and inclusive practice, while maintaining dignity, privacy, safety and protection from discrimination for all colleagues, applicants, apprentices and learners.

Deputy Managing Director & Senior Leadership Team

- Ensure EDI and inclusion are reflected in quality assurance, self-assessment and inspection readiness activity.

- Embed Total People's Equality, Diversity and Inclusion Strategy and policies
- Ensure all colleagues complete and comply with mandatory Equality, Diversity and Inclusion training
- Ensure colleagues adhere to Equality, Diversity and Inclusion CPD plans
- Ensure leaders and managers understand and apply this policy within their areas of responsibility.
- Equality, Diversity and Inclusion is embedded into teaching, learning, curriculum, assessment, learner support and access arrangements, and supports alignment with current FE inspection expectations relating to inclusion.
- Ensure that Total People's physical estate offers safe and inclusive spaces that meet colleagues' and apprentices'/learners' needs.
- Define and monitor key indicators to assess how effectively this policy is being implemented for apprentices and learners. This may include training completion, learner survey responses, complaints and concerns, attendance, retention, achievement, progress, destinations and EDI action plan progress.

Quality Team

- Support the implementation of this policy through self-assessment, quality improvement planning, quality reviews and monitoring activity.
- Set areas for improvement at organisational level as part of the annual self-assessment and quality improvement planning process.
- Embed Equality, Diversity and Inclusion into the quality monitoring cycle (Quality Review)
- Ensure that effective improvement plans are in place to address apprentice/learner performance issues relating to Equality, Diversity and Inclusion at organisational level.
- Analyse, track and monitor Equality, Diversity and Inclusion apprentice/learner data at organisational level.
- Report EDI themes, risks, actions and progress to SLT through agreed quality and governance routes.

Head of Learner Experience and EDI Lead

- Strategy and monitoring: Lead the operational development, monitoring and review of the EDI action plan and EDI monitoring arrangements, ensuring these align with Total People and LTE Group strategic priorities.

- Share and review EDI data through EDI monitoring arrangements and update the EDI action plan accordingly, including key objectives linked to access arrangements, SEND training and wider LDD provision.
- Support consistent implementation of this policy across learner experience, safeguarding, SEND, curriculum and employer-facing activity.
- **Training and support:** Ensure EDI, LTE Group values and Total People values are shared through colleague induction, and that relevant links are made to the Code of Conduct, professional expectations and the duty to prevent sexual harassment.
- Support Curriculum and Performance Managers to identify CPD and improvement needs for Learning Coaches where this relates to EDI, inclusive practice, SEND/LDD, learner support or reasonable adjustments.
- Provide training, advice and support to relevant managers in relation to Equality Impact **Assessments.**

Curriculum and Performance Managers

- Monitor curriculum delivery, assessment, learner support and employer engagement to ensure EDI is embedded consistently within their curriculum area.
- Review learner progress, attendance, retention, achievement, learner voice and support needs to identify barriers to access, participation and outcomes.
- Ensure team members complete mandatory EDI training and identify further CPD needs linked to inclusive practice, SEND/LDD, learner support and reasonable adjustments.
- Put improvement actions in place where curriculum area data, learner feedback, quality activity or complaints identify EDI-related gaps or concerns.
- Contribute to Equality Impact Assessments where curriculum, assessment, learner support or delivery changes may affect access, participation or outcomes.

Learning Coaches

- Apply this policy within day-to-day learner support, teaching, review activity, employer contact and learner progress discussions.
- Embed Equality, Diversity and Inclusion into day-to-day teaching, learning, review activity and learner support, in line with Total People values, the Code of Conduct and British Values.
- Complete required Equality, Diversity and Inclusion CPD and apply learning to learner support and delivery practice.

- Support learners through initial assessment, reviews and progress discussions so that SEND/LDD needs, support needs and reasonable adjustments are identified, recorded and reviewed.

HR

- Support fair and inclusive employment practices across recruitment, retention, development, colleague wellbeing and access to work.
- Ensure HR policies and procedures, including grievance, capability, absence and disciplinary processes, are applied fairly and in line with this policy.
- Monitor workforce diversity and provide relevant pay reporting, including the Gender Pay Gap report where appropriate.
- Support managers to implement the Code of Conduct, professional standards and expected behaviours in a consistent and inclusive way.
- Monitor training, data, concerns and actions linked to the duty to take reasonable steps to prevent sexual harassment of employees.
- Monitor concerns or incidents relating to discrimination, harassment or victimisation linked to any protected characteristic, and ensure appropriate support, action and learning are put in place.

IT Services

- IT acceptable use policies/procedures
- Support accessible and inclusive use of digital systems, platforms and assistive technology where appropriate, working with relevant colleagues to reduce barriers to learning, communication and participation.

Business Development Marketing

- Promote apprentice/learner and employer recruitment that 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
- Ensure social media and published communications align with this policy and aim to reflect inclusive and respectful practice within Total People and LTE Group brand guidelines.

- Use marketing literature, publicity materials, public displays, signage and visual imagery that aim to reflect inclusive and respectful practice within Total People and LTE Group brand guidelines.
- Promotion and delivery of Equality, Diversity and Inclusion campaigns/messages

All Total People Employees

- Read, understand and apply this policy in day-to-day work, learner support, recruitment activity, employer contact and interactions with colleagues, apprentices and learners.
- Complete mandatory CPD within required timescales and apply learning to working and learning practices.
- Promote professional conduct, respectful behaviour and inclusive practice, ensuring no person is discriminated against, harassed or victimised because of any protected characteristic.
- Understand when and how to report concerns relating to Equality, Diversity and Inclusion, including discrimination, harassment, sexual harassment, bullying or victimisation. Concerns should be reported to a line manager, HR, the Head of Learner Experience or a member of SLT as appropriate. Where there is a safeguarding or welfare concern, Total People's safeguarding reporting routes must be followed without delay.
- Challenge behaviour that is not aligned to this policy safely and appropriately, escalating concerns to a line manager or through agreed reporting routes where required.
- Support a culture where reasonable steps are taken to prevent sexual harassment and where concerns are reported, reviewed and addressed appropriately.

Apprentices, Learners and Employers

- Apprentices, learners and employers are expected to contribute to an inclusive learning and working environment by treating others with dignity and respect, using appropriate language, engaging positively with EDI learning and supporting Total People's values and expectations.
- Apprentices and learners will be introduced to EDI expectations at induction and through regular progress reviews. Employers will be made aware of their responsibilities through the opportunity stage, commitment statement, induction and review activity.
- Where discriminatory language or behaviour is seen, heard or experienced, apprentices, learners and employers should challenge it safely where appropriate or report it through Total People's agreed routes.

- Where a learner needs reasonable adjustments, access arrangements or a support plan, Total People will work with the learner, employer and relevant colleagues to identify and put appropriate support in place. This will be reviewed through learner support processes, progress reviews and relevant quality assurance activity.

Apprentices and Learners Can Expect:

- Inclusive teaching, learning, assessment and support that recognises individual needs.
- Learning resources and communications that aim to be free from bias, challenge stereotypes and reflect diversity.
- Reasonable adjustments, access arrangements and support where needed.
- Concerns about discrimination, harassment, bullying, sexual harassment or victimisation to be taken seriously and responded to appropriately.
- Opportunities to share feedback about inclusion, belonging, respect, support and access through learner voice activity.

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 during induction
- Support through the Quality team, where a CPD need is identified
- Embedding Equality, Diversity and Inclusion 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, with EDI, respect and reporting routes revisited through regular progress reviews.

Employers

- Policy overview at opportunity stage
- Commitment statement

Promoting and Embedding the Policy:

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

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

- Colleague induction, training, CPD and online learning modules
- Team meetings and one-to-one meetings
- 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 substantive changes are made, such as policy or curriculum changes
- Bi-monthly newsletters, monthly email communications and regular all-colleague briefings that relay messages on EDI, mental health and safeguarding
- Relevant wellbeing activity and colleague feedback routes that support inclusion and engagement
- LTE Group Equality, Diversity and Inclusion Report, published on Total People and MOL's website

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

- Monitoring outcomes from online and interactive training for both colleagues and apprentices/learners
- Ensuring updates are effectively communicated to colleagues, learners and employers
- Managers will evidence that this policy has been discussed through team meetings, one-to-ones, training records and the annual appraisal process.
- Monitoring of learner review documentation
- Monitoring specific responses to Equality, Diversity and Inclusion in learner and employer surveys

- Learner voice activity, including learner surveys and monthly learner voice activity led by the DSL, will include opportunities for apprentices and learners to share feedback on inclusion, respect, belonging, reasonable adjustments, support needs and whether they know how to report EDI-related concerns. Feedback will be reviewed through EDI monitoring arrangements, learner voice reporting and quality assurance activity.
- Through our use of internal quality checks, reviews and audits.

Outcomes and themes from EDI monitoring will be reviewed through relevant quality and governance routes and will inform the annual LTE EDI report, which Total People and MOL contribute to.

Subcontractors:

Total People's Partnership Team is responsible for completing required due diligence checks and monitoring subcontractor quality and compliance. Subcontractors must have their own Equality, Diversity and Inclusion policies and procedures in place, and must also comply with Total People's policy requirements.

Subcontractor EDI arrangements must include:

- a policy review cycle, including responsibility for updates and sign-off;
- the last and next review date, and version number;
- how colleagues, apprentices/learners, employers, visitors and stakeholders are made aware of the policy;
- how implementation of the policy is monitored and continuously improved.
- Subcontractor compliance will be checked through due diligence, contract review meetings, monitoring visits, learner and employer feedback, complaints, safeguarding and EDI themes, training records and quality assurance activity. Where gaps are identified, actions will be agreed, monitored and escalated where required.

Data Collection, Analysis and Continuous Improvement

Total People uses data, learner voice, employer and subcontractor feedback, colleague feedback, complaints, quality assurance activity and external information to identify strengths, barriers and areas for improvement. Colleagues, applicants, apprentices and learners are encouraged to provide equality, diversity and inclusion information to support monitoring and improvement, but providing this information is voluntary.

This supports continuous improvement and helps ensure that EDI is embedded across learning, support, employment and operational practice.

Total People will do this by:

- reviewing learner recruitment, attendance, retention, achievement, progress and destination data to identify trends, strengths and gaps.
- using apprentice and learner feedback, including learner voice activity, to inform decisions about curriculum, support, access and delivery.
- using employer, subcontractor and stakeholder feedback to improve awareness, implementation and impact of this policy.
- reviewing colleague feedback relating to Equality, Diversity and Inclusion, wellbeing and mental health where this supports inclusion, engagement and access to work.
- using labour market and external performance data to ensure the curriculum offer remains relevant, inclusive and responsive to learner, employer and community needs.
- setting improvement actions at organisational, cluster or product level where data or feedback identifies EDI-related gaps, barriers or risks.
- analysing EDI data through the Quality Review cycle, annual self-assessment, EDI monitoring arrangements and EDI action plan to identify themes and inform changes to practice, resources and training.
- using the current further education and skills inspection toolkit, operating guides and inspection information to support self-assessment, quality improvement planning, continuous improvement and inspection readiness.
- providing CPD for colleagues where EDI themes, data or quality activity identify a development need.
- providing opportunities for colleagues to explore and share inclusive teaching, learning and assessment practice through the Teaching and Learning Toolbox (Teams).

Equality Impact Assessments:

Equality Impact Assessments will be completed, reviewed or updated where there are significant changes to policy, curriculum, delivery model, learner support, digital systems, premises, recruitment, assessment arrangements or services. This helps Total People consider the possible impact of decisions on colleagues, applicants, apprentices, learners and other stakeholders.

The outcomes of Equality Impact Assessments will be used to identify and reduce barriers, improve inclusion, inform reasonable adjustments where needed and evidence fair decision-making. Actions identified through an Equality Impact Assessment will be recorded, monitored and reviewed through the appropriate quality assurance, governance or EDI action planning route.

Accessible Communication:

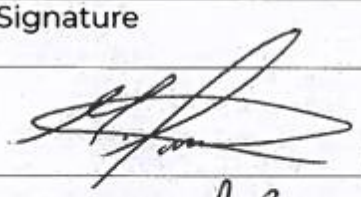
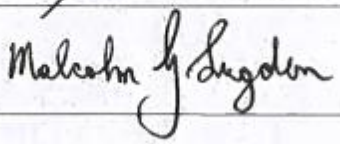
Total People will aim to make key policy information and learner-facing EDI messages clear, accessible and easy to understand. Policies are broken down into learner handbooks and key learner information is written in plain English wherever possible. Information is shared digitally and hard copies are displayed where appropriate.

Where individual learners need additional support to access information, Total People will consider reasonable adjustments, including the use of assistive technology or adapted communication methods where appropriate. Marketing materials, imagery and published communications will follow Total People and LTE Group brand and marketing guidelines, while aiming to reflect inclusive and respectful practice.

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.

Learners, employers, colleagues and stakeholders can request this policy in an alternative format or ask questions about the policy through their Total People contact or the relevant published contact route.

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