

Equality and Diversity Policy

Purpose and Scope

i-to-i firmly believes that our employees, customers and clients should have a safe working environment and must not suffer less favourable treatment as a result of discrimination. Ensuring that there is no discrimination in the workplace is therefore of fundamental importance.

This policy sets out our approach to ensuring equality and diversity. It applies to all staff, workers, trainers, assessors, moderators, clients and learners.

i-to-i reserves the right to modify any part of this policy at its discretion and in accordance with any required legislation changes. We are committed to actively consulting with our employees and any changes will be communicated, and will apply to, both existing and new employees in the UK.

Definitions

Discrimination can take many forms and may be 'direct' or 'indirect'.

Direct Discrimination is defined as less favourable treatment on the grounds of gender, race, colour, nationality, ethnic or national origins, sexual orientation, disability, religion, pregnancy, age, or on the grounds that the colleague is a part-time or fixed term worker.

For example, if a company refused to promote a woman because it was thought that she may not 'fit in' this would be direct discrimination which cannot be justified on any grounds. Harassment is another form of direct discrimination, which is dealt with in our Dignity at Work Policy.

Indirect Discrimination occurs when a provision, criterion or practice, requirement or condition is imposed which puts persons of a certain gender, race, colour, nationality, ethnic or national origin, or sexual orientation at a particular disadvantage when compared with other persons, and that those provisions criterion, practices, requirements or condition cannot be objectively justified.

For example, an employer may demand unnecessarily high educational qualifications, which could have an adverse impact on persons of non-British race educated overseas. This is unlawful unless it can be justified on the grounds that the qualifications are necessary to do the job properly.

Encouraging discrimination to occur is also discrimination and may result in disciplinary action which could lead to dismissal from the Company.

Approach to Equality and Diversity

i-to-i believes that to effectively serve our customers, we must understand their diverse needs and points of view. For these reasons we are committed to developing a truly diverse workplace that reflects the diversity of our customers.

We will ensure that, through our policies, procedures and actions, everybody who uses i-to-i's services is treated fairly, with respect, with dignity and on an equal basis, in line with all current equalities legislation.

All staff, customers and clients will be expected to have a clear commitment in support of this objective. Failure to follow the policy will be regarded as misconduct and could lead to disciplinary action. This information will be used to inform future policy and to enhance business processes.

i-to-i may also be guilty of discrimination if it allows a third party to act in a discriminatory way when reasonable steps could have prevented the discrimination from occurring.

Responsibilities

i-to-i's Managing Director holds ultimate responsibility for ensuring that all necessary actions are taken to ensure the effective implementation of this policy by all staff and associates.

All staff, trainers, assessors and moderators will be provided with guidance and training in relation to diversity and equality through the induction process and through the staff appraisal process.

All staff, trainers, assessors and moderators are required to:

- Ensure that discrimination does not take place, whether it is directed towards fellow employees, contract workers, suppliers, customers or members of the public
- Support diversity and equality, both in spirit and in practice
- Be fully aware of the Equality Policy
- Take personal responsibility for implementing and promoting these principles in their day to day dealings with customers and each other.

The HR Team will:

- Monitor, measure and report on the effectiveness of our service delivery and employee policies in relation to these principles
- Escalate any concerns for resolution.

Aim

i-to-i aims to ensure that:

- The content of our training, the provision of our advice service and the assessment of our qualifications are non-discriminatory and allow for the widest diversity of learners
- The style and language of our documentation do not reflect stereotyped or biased attitudes
- All of our staff apply a non-discriminatory approach
- We have an effective appeals procedure.

Implementation

i-to-i will not tolerate discrimination on the basis of age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, caste, nationality, ethnic or national origin, religion or belief, sex or sexual orientation (protected characteristics).

We strive to ensure that we follow anti-discriminatory practices and are committed to challenging discrimination if it is encountered. We regard discrimination against employees, job candidates or customers as gross misconduct, which is likely to lead to summary dismissal.

i-to-i will take all necessary action to ensure that our diversity and equality policies are effectively implemented through:

- Taking appropriate steps to ensure that there is no bias in the format, content or language of any of the company's documents and materials, which might place unnecessary barriers to specific groups
- The selection and actions of all those working for or on behalf of us
- Flexible interpretation of rules and regulations which may inhibit the access or performance of learners with special requirements.

In addition, we aim to ensure that no job applicant suffers discrimination because of any of the protected characteristics above by:

- Regularly reviewing our recruitment procedures to ensure that individuals are treated on the basis of their relevant merits and abilities
- Regularly reviewing our job selection criteria to ensure that they are relevant to the job and are not disproportionate
- Having more than one person involved in shortlisting of applicants, wherever possible.

Disability

If you have or develop a disability, we encourage you to tell us about your condition so that we can support you as appropriate. If you experience difficulties at work because of your disability, you may wish to contact your line manager to discuss any

reasonable adjustments that would help overcome or minimise the difficulty. Your line manager may wish to consult with you and your medical adviser(s) about possible adjustments.

We will consider the matter carefully and try to accommodate your needs within reason. If we consider a particular adjustment would not be reasonable, we will explain our reasons and try to find an alternative solution where possible.

Fixed, Part-time and Agency Contracts

i-to-i monitors its use of fixed-term employees and agency workers, and their conditions of service, to ensure that they are being offered appropriate access to benefits, training, promotion and permanent employment opportunities. We will, where relevant, monitor their progress to ensure that they are accessing permanent vacancies.

i-to-i also monitors the conditions of service of part-time employees and their progression to ensure that they are being offered appropriate access to benefits and training and promotion opportunities. We will ensure requests to alter working hours are dealt with appropriately.

All employees, whether part-time, full-time or temporary, will be treated fairly and with respect. Selection for employment, promotion, training or any other benefit will be on the basis of aptitude and ability.

Entitlement to work in the UK

i-to-i is required by law to ensure that all employees are entitled to work in the UK.

Assumptions about immigration status should not be made based on appearance or apparent nationality. All prospective employees, regardless of nationality, must be able to produce original documents (such as a passport) before employment starts, to satisfy current immigration legislation.

The list of acceptable documents is available from the HR Department or the UK Border Agency.

Use of Data

Data pertaining to diversity and equality (which may include, but is not limited to, gender, age, ethnicity) may be used for the following purposes:

- To monitor our compliance with Equality legislation
- To evaluate the accessibility of services we supply
- To inform market research and our marketing strategy
- To inform external agencies such as Awarding Organisations as to the volume of services accessed by diverse groups and individuals so as to inform business planning and development.

Collation and use of such data will be fully compliant with Data Protection and Privacy regulations.

Discrimination Complaints Procedure

If you feel that you are being discriminated against, whether by a fellow employee (at whatever level), a supplier or customer, you may decide to address the problem with the person who you believe has discriminated against you. You should tell him or her, verbally or in writing, what aspect of his or her conduct is not acceptable. This action should only be taken if you are comfortable to do so.

If the action above has no, or insufficient, effect or you do not feel comfortable raising the matter directly with the person(s) involved you should contact the HR Department as soon as possible. If you speak to the HR Advisor, you will be asked to put your complaint in writing.

As a general principle, the decision of whether to progress a complaint is up to you. However, we have a duty to protect all staff and may pursue the matter independently if, in all the circumstances, we consider it appropriate to do so.

i-to-i's HR Advisor will lead any investigation into a complaint of discrimination and will advise on any action that is to be taken.

Raising a Formal Complaint

If you wish to make a formal complaint about bullying or harassment, or any other form of discrimination you should submit it in writing to HR. Your written complaint should set out:

- Full details of the conduct in question
- The name of the person(s) involved
- The nature of the alleged discrimination
- The date(s) and time(s) at which it occurred
- The names of any witnesses
- Any action that has been taken so far to attempt to stop it from occurring.

i-to-i will investigate complaints in a timely and confidential manner. The investigation should be thorough, impartial and objective, and carried out with sensitivity and due respect for the rights of all parties concerned.

Investigation Approach

We will arrange a meeting with you, usually within one week of receiving your complaint, so that you can give your account of events. You have the right to be accompanied by a colleague or a trade union representative of your choice, who must respect the confidentiality of the investigation. You will be given a provisional timetable for the investigation.

The investigator will also meet with the alleged perpetrator to hear their account of events. They have a right to be told the details of the allegations against them, so that they can respond.

Where your complaint is about an employee, we may consider suspending them on full pay or making other temporary changes to working arrangements pending the outcome of the investigation, if circumstances require.

Where your complaint is about someone other than an employee, such as a contractor, customer, supplier, or visitor, we will consider what action may be appropriate to protect you and anyone involved pending the outcome of the investigation, bearing in mind the reasonable needs of the business and the rights of that person. Where appropriate, we will attempt to discuss the matter with the third party.

It may be necessary to interview witnesses to any of the incidents mentioned in your complaint. If so, the importance of confidentiality will be emphasised to them.

Any staff member who deliberately provides false information or otherwise acts in bad faith as part of an investigation may be subject to action under the Company Disciplinary Procedure.

Investigation Outcomes

If the investigating officer considers that discrimination has occurred, prompt action will be taken to address it. Where the alleged perpetrator is an employee the matter will be dealt with as a case of possible misconduct or gross misconduct under our Disciplinary Procedure.

Where the alleged perpetrator is a third party, appropriate action might include putting up signs setting out acceptable and unacceptable behaviour; speaking or writing to the person and/or their superior about their behaviour; or, in very serious cases, banning them from the premises or terminating a contract with them.

Whether or not your complaint is upheld, we will consider how best to manage the ongoing working relationship between you and the alleged party. It may be appropriate to arrange some form of mediation and/or counselling, or to change the duties, working location or reporting lines of one or both parties.

Information about a complaint by or about an employee may be placed on the employee's personnel file, along with a record of the outcome and of any notes or other documents compiled during the process.

Confidentiality

Confidentiality is an important part of the procedures provided under this policy.

Records of any equality matters, colleague details and relevant documentation, will

be kept confidentially and in accordance with the Data Protection Act 2018.

Everyone involved in the operation of the policy, whether making a complaint or involved in any investigation, is responsible for observing the high level of confidentiality that is required.

Details of the investigation and the names of the person making the complaint and the person accused must only be disclosed on a "need to know" basis.

Victimisation

Staff who make complaints or who participate in good faith in any investigation conducted under this policy must not suffer any form of retaliation or victimisation as a result. If you believe you have suffered any such treatment you should inform your line manager or the HR Advisor.

If the matter is not remedied you should raise it formally using the Company Grievance Procedure or this procedure if appropriate.

Grievances

Any employee who considers that they have been treated unfairly or discriminated against may alternatively opt to raise the matter through the Grievance Policy.

Review

This policy will normally be reviewed on an annual basis. The next review is due in November 2021.