

Version	Adopted by Board on	Signature of Chair
1.0		



Equality and Diversity Policy

Policy Statement

1. TURN Education C.I.C. (the Company) is firmly committed to the principles of equality, diversity and inclusion in both employment and the accessibility and delivery of services.
2. This means:
 - Promoting equality and making services and employment accessible to all;
 - Treating people fairly, regardless of their:
 - Age
 - Disability
 - Gender reassignment
 - Marital or civil partner status
 - Pregnancy and maternity
 - Race (colour; ethnic or national origin)
 - Religion or belief
 - Sex
 - Sexual orientationor because of their association with someone who has any of these characteristics. These are known as '**protected characteristics**'.
3. This policy covers all individuals working at all levels and grades, including (but not limited to) directors, consultants, contractors, interim management, part-time and fixed-term staff, volunteers, casual workers and agency staff (collectively referred to as 'personnel' in this policy).
4. In order to provide the best possible service to our customers, the Company aims to have a personnel base that is representative of the communities that it serves.
5. Fairness at work and good job performance go hand in hand therefore; tackling discrimination helps to attract, motivate and retain staff and enhances the reputation of the Company as a good employer and service provider. As a consequence of having fair and robust policies, the Company will ensure that all personnel have equal access to work within their skills and abilities and, where appropriate and practicable, the opportunity to develop their skills and abilities.
6. The Company is opposed to all forms of unlawful and unfair discrimination and harassment of any kind, and will work to eliminate it, to create a working environment where everyone is treated with dignity and respect. All personnel are expected to be accountable and to challenge discrimination.
7. As an employer and service provider, the Company will aim to challenge social exclusion and discrimination, promote equality and celebrate diversity to achieve excellence.

The Legal Framework

8. The Company's legal obligations and duties include those defined by the Equality Act 2010 in relation to discrimination and social inclusion. The Equality Act 2010 provides further guidance.

Forms of discrimination

9. Discrimination by or against an a member of personnel is generally prohibited unless there is a specific legal exemption. Discrimination may be direct or indirect and it may occur intentionally or unintentionally.
10. **Direct discrimination** occurs where someone is treated less favourably because of one or more of the protected characteristics set out above.
11. **Indirect discrimination** occurs where someone is disadvantaged by an unjustified provision, criterion or practice that also puts other people with the same protected characteristic at a particular disadvantage.
12. **Harassment** related to any of the protected characteristics is prohibited. Harassment is unwanted conduct that has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.
13. **Victimisation** occurs when an employee is treated badly because they have made or supported a complaint or raised a grievance under the Equality Act; or because they are suspected of doing so.

Managing diversity

14. Managing diversity goes much further than having an equality policy. It is about recognising, respecting and responding to individual differences and needs and treating people fairly and equally but not necessarily in the same way.
15. The ownership of managing diversity forms part of the Company's constitution and ethos. All personnel are required to work within the ethos of equality and diversity and will be given appropriate training and guidance to do this.

Recruitment and employment

16. The Company aims to ensure that no applicant for a position within the Company suffers discrimination because of any of the protected characteristics above. Recruitment procedures are reviewed regularly to ensure that individuals are treated on the basis of their relevant merits and abilities. Selection criteria are regularly reviewed to ensure that they are relevant to the position and are not disproportionate.
17. The Company has implemented and will continue to develop policies and practices to achieve equality of opportunity for applicants for positions within the Company, and all personnel.
18. The Company will aim to ensure that applicants are drawn from the widest possible pool practicable. Conditions of service, benefits and facilities will be reviewed regularly to ensure that they are available to all personnel who should have access to them and that there are no unlawful obstacles to accessing them.

Learning and development

19. All personnel will be given appropriate access to training to enable them to fulfil their role to the best of their abilities and, where appropriate and practicable, to progress within the organisation. All promotion decisions will be made on the basis of merit.
20. Learning and development needs will be regularly monitored to ensure equality of opportunity at all levels of the organisation. Where appropriate, steps will be taken to identify and remove unjustified barriers and to meet the special needs of disadvantaged or under-represented groups.

Disability Discrimination

21. Personnel who are disabled or become disabled are encouraged to tell the Company about their condition so that they can be supported as appropriate.
22. If personnel experience any difficulties at work because of their disability, they should contact their line manager to discuss any reasonable adjustments that would help overcome or minimise the difficulty. The line manager should consult with the member of staff and their medical adviser(s) about reasonable adjustments. The Company will consider the matter carefully and, where reasonable and practicable, try to accommodate needs. In the first instance any director needing such consideration should contact the Chair of the Board of Directors.
23. The Company will monitor the physical features of all premises to consider whether they place disabled personnel, applicants for positions within the Company, or service users at a substantial disadvantage compared to others. Where reasonable and practicable, the Company will take steps to improve access for disabled personnel and service users.

Breaches of this Policy

24. Personnel who believe that they may have been discriminated against are encouraged to raise the matter through the grievance procedure set out in *'Putting Things Right'* the Company's Grievance and Disciplinary Framework.
25. Allegations regarding potential breaches of this policy will be treated in confidence and investigated in accordance with the relevant policy. Personnel who make such allegations in good faith will not be victimised or treated less favourably as a result. False allegations which are found to have been made in bad faith may, however, be dealt with under *'Putting Things Right'* the Company's Grievance and Disciplinary Framework.
26. Any member of personnel who is alleged to have committed an act of discrimination or harassment will be the subject of an investigation. Investigations relating to employees will take place in accordance with the provisions of the Disciplinary Procedure. Such behaviour if substantiated may result in a formal sanction. In the case of employees, this will constitute gross misconduct under the Disciplinary Procedure, which may lead to dismissal without notice. For personnel other than employees, such behaviour will constitute gross misconduct and may be dealt with under the terms of *'Putting Things Right'* the Company's Grievance and Disciplinary Framework. The Company adopts a strict approach to serious breaches of this policy.

Discrimination 'by association' or 'perception'

27. Protection is provided for people who are discriminated against because they are perceived to have or are associated with someone who has, a 'protected characteristic'.

Occupational Requirements

28. Schedule 9 of the Equality Act 2010 allows the Company to lawfully treat people differently in very limited circumstances, as a proportionate means of achieving a legitimate aim, where a specific and justifiable occupational requirement exists.
29. When deciding if this applies it is necessary to consider the nature of the work and the context in which it is carried out. Jobs may change over time and the Company should consider whether the requirement continues to apply, particularly when recruiting to a role where an occupational requirement has previously been justified.

Responsibilities

30. The Managing Director and the Board of Directors have day to day responsibility for embedding diversity into the culture of the Company and are responsible for implementing and monitoring any diversity issues.
31. The Managing Director and the Board of Directors will ensure that opportunities for promotion, learning and development are accessible to all personnel and are available on a fair and equal basis. New personnel will undertake an appropriate induction which covers equality and diversity.
32. The Managing Director and the Board of Directors understand that discrimination and harassment are unlawful and totally unacceptable and will challenge any inappropriate or discriminatory behaviour of which they become aware.
33. The Managing Director and the Board of Directors are responsible for ensuring that all personnel understand that if they harass colleagues or service users they may be subject to disciplinary action and could also be held personally liable.

Individual Responsibilities

34. Personnel are expected to take an active part in promoting equality and diversity in everything that they do at work and to treat everyone in their working environment with dignity and respect.
35. The Company requires all personnel to behave in a non-discriminatory way towards colleagues and members of the public. Failure to do so will be taken seriously and could lead to disciplinary action.
36. Personnel may challenge inappropriate or discriminatory behaviour where they feel confident to do so or to report it to the Managing Director.. They can also raise

concerns about behaviour they find offensive even if it is not specifically directed at them.

37. Personnel who make unfounded or malicious complaints or operate those procedures vexatiously may be subject to disciplinary action in accordance with the provisions of '*Putting Things Right*' the Company's Grievance and Disciplinary Framework.

Monitoring of this Policy

38. The Company will continue to review the effectiveness of this policy to ensure it is achieving its objectives. As part of this process the Company will monitor the composition of the selection pool for applicants for positions within the Company and the benefits and, where appropriate, career progression of its personnel.

Accountability

39. All directors hold delegated responsibility for discharging the sound application of all the Company policies.
40. In accordance with the Company's terms of reference, the Managing Director has delegated responsibility for the Board of Directors.
41. Should the subject of the application of this policy be the Managing Director, in principle any other director will be responsible for discharging the relevant policy and a democratic Board decision made by all directors as to the course of action.
42. Directors should inform the Chair of the Board of Directors of all matters relating to serious breaches of this policy including any major incident to be addressed under this policy promptly, preferably prior to action being taken insofar as is reasonably practicable.

Policy Status

This policy does not form part of any employee's contract of employment.

EQUALITY STATEMENT

The Company is committed to ensuring equality of opportunity in line with the Equality Act 2010. The Company seeks to reduce disadvantages, discrimination and inequalities of opportunity, and promote diversity in terms of its directors, workforce and the communities it serves.

The Company will not discriminate on any of the grounds listed below (known as the Protected Characteristics) save where such discrimination is permitted by law. Examples of permitted discrimination are:

1. The Company may take positive action to deal with particular disadvantages affecting personnel or service users of one racial group if this is a proportionate means of dealing with the issue.

The Protected Characteristics are:

- Age
- Disability
- Gender reassignment
- Marital or civil partner status
- Pregnancy and maternity
- Race (colour; ethnic or national origin)
- Religion or belief
- Sex
- Sexual orientation

The Company will not tolerate any of the following:

- Direct or Indirect Discrimination
- Harassment
- Victimisation

Policy agreed and approved at a full Board meeting of all Directors

Date of review