

Equality, Diversity and Inclusion Policy

Skills Bootcamp Provision | Adult Learners 19+ | Version 2.0

| Policy field | Current position |
|--------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Provider | Quack Recruitment & Training Ltd |
| Applies to | Adult learners aged 19+, prospective learners, staff, workers, tutors, assessors, candidates, clients, employers, subcontractors, partners and visitors |
| Policy owner | Jessica Roughton - Quality & Compliance Lead, DSL and SEND Lead |
| Senior accountable lead | Dion Bishop - Director of Contracts & Operations |
| Designated Safeguarding Lead | Jessica Roughton |
| Deputy Designated Safeguarding Lead | Aaron Jones |
| Approved systems | PICS, recruitment systems, approved learner records, staff records, learner voice, complaints records, quality assurance records and approved communication channels |
| Next review | June 2027 or sooner following legislative, safeguarding, data protection, funder, awarding body or operational change |

Policy intent: Equality, diversity and inclusion must be embedded across recruitment, learning, assessment, learner support, employer engagement and progression. This policy sets out how Quack Recruitment & Training Ltd promotes fairness, removes barriers, challenges discrimination and monitors outcomes for staff, learners, candidates, clients and employers.

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1. Purpose and Policy Intent

Quack Recruitment & Training Ltd is committed to promoting equality, valuing diversity and creating an inclusive culture in which people are treated with dignity, respect and fairness. This policy explains the standards expected across employment, recruitment services, learner recruitment, funded programmes, Skills Bootcamps, teaching, assessment, learner support, employer engagement and progression activity.

The intent of this policy is to ensure that no learner, prospective learner, employee, worker, candidate, client, employer, subcontractor or partner receives less favourable treatment because of a protected characteristic or because of association with a person who has a protected characteristic. The policy also ensures that EDI is visible in learner experience, curriculum delivery, reasonable adjustments, learner voice, quality assurance and performance monitoring.

This version addresses funder feedback by ensuring the policy is not limited to candidates and clients. It explicitly covers learners, funded programmes, Skills Bootcamps, inclusive teaching, learner support, reasonable adjustments and monitoring of learner outcomes.

2. Scope and Application

| Applies to | Application |
|------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------|
| Learners and prospective learners | IAG, eligibility, enrolment, induction, teaching, assessment, support, progression and post-programme contact. |
| Staff and workers | Recruitment, induction, work allocation, development, conduct, progression and workplace culture. |
| Candidates and clients | Recruitment services, candidate attraction, screening, shortlisting, employer introduction and vacancy matching. |
| Employers and partners | Employer engagement, interviews, work-related activity, progression evidence, subcontracted activity and external contributors. |
| Digital and physical environments | Classroom delivery, online learning, learner communication, interviews, work placements or employer-linked activity. |

3. Legal, Regulatory and Inspection Context

This policy operates in accordance with the Equality Act 2010 and relevant guidance issued by the Equality and Human Rights Commission and other statutory bodies. It should be read alongside the Safeguarding Policy, Prevent Policy, Learner Support Policy, Online and E-Learning Policy, Complaints Policy, Safer Recruitment Policy, GDPR and Privacy Policy, staff conduct procedures and learner handbook.

| Framework | Relevance to EDI |
|-----------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------|
| Equality Act 2010 | Protects people from unlawful discrimination, harassment and victimisation and requires reasonable adjustments for disabled people. |
| UK GDPR and Data Protection Act 2018 | Requires equality, support and sensitive personal information to be handled lawfully, securely and proportionately. |
| Safeguarding and Prevent duties | EDI practice supports safe, respectful learning environments and escalation of hate, harassment, exploitation or radicalisation concerns. |
| Funder and contract requirements | Funded provision requires fair access, accurate records, inclusive recruitment, learner support and evidence of progress and outcomes. |
| Ofsted further education and skills inspection materials | Inspectors consider inclusion, learner development, safeguarding culture, leadership oversight and whether learners participate, achieve and progress. |

4. Definitions

| Term | Meaning for this policy |
|--------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Equality | Ensuring people are treated fairly and are not disadvantaged by protected characteristics, barriers or unequal access. |
| Diversity | Recognising, valuing and respecting differences in people, experiences, backgrounds and needs. |
| Inclusion | Creating environments where people can participate, feel respected, access support and contribute safely. |
| Direct discrimination | Treating someone less favourably because of a protected characteristic. |
| Indirect discrimination | Applying a provision, criterion or practice that disadvantages people with a protected characteristic and cannot be objectively justified. |
| Harassment | Unwanted conduct related to a protected characteristic that violates dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment. |
| Victimisation | Treating someone unfavourably because they raised or supported a complaint or concern under equality legislation. |

5. Policy Statement

Quack Recruitment & Training Ltd will promote a culture where staff, learners, candidates, clients, employers and partners are treated with dignity and respect. EDI must be visible in recruitment, learner selection, teaching, support, assessment, progression, employer engagement and quality assurance.

- treat people fairly, consistently and with dignity;
- challenge discrimination, harassment, victimisation, bullying and exclusion;
- remove barriers to access, participation, learning, assessment, employment and progression wherever reasonably possible;
- make reasonable adjustments for disabled people and learners with additional needs;
- ensure recruitment, learner selection, training, assessment and progression decisions are based on objective criteria;
- use learner and workforce data to identify gaps, patterns and improvement actions;
- promote inclusive language, resources, teaching, support and employer engagement.

6. Protected Characteristics and Prohibited Conduct

The protected characteristics under the Equality Act 2010 are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. Quack will not tolerate unlawful discrimination, harassment, victimisation, bullying, intimidation, exclusion or discriminatory selection practices connected to these characteristics.

| Conduct | Examples | Control response |
|-----------------------------------|-----------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------|
| Discrimination | Less favourable treatment, unfair selection, exclusion from learning or employment opportunity. | Investigate, record, take corrective action and apply disciplinary or complaints procedures where required. |
| Harassment | Abusive, sexualised, racist, homophobic, transphobic, ableist, religiously offensive or intimidating behaviour. | Immediate intervention, safeguarding consideration, investigation and appropriate action. |
| Victimisation | Treating someone badly because they raised or supported a concern. | Protect complainant, investigate and address through appropriate procedure. |
| Third-party discrimination | Employer, client, learner or external party behaves discriminatorily towards staff, learners or candidates. | Challenge, record, escalate and review the relationship or activity as required. |

7. Learners and Funded Provision

Quack will take reasonable steps to ensure learners and prospective learners can access information, advice, guidance, enrolment, learning, support, assessment and progression activity fairly. Eligibility and suitability checks must be transparent and must not introduce avoidable barriers for groups who are underrepresented, disadvantaged or have additional support needs.

- provide clear information about programme requirements and available support;
- monitor learner participation, attendance, retention, achievement and destinations across different learner groups;
- ensure learner materials and communication are accessible, respectful and inclusive;
- respond promptly to discriminatory language, conduct, harassment or bullying during training or employer engagement activity;
- provide reasonable adjustments and additional support in line with the Learner Support Policy.

8. Recruitment, Candidates, Clients and Employers

Quack's recruitment and employer-facing activity must be fair, transparent and based on merit, suitability and objective role requirements. The policy retains references to candidates and clients because Quack operates recruitment services as well as funded training, but learner and funded programme requirements are now explicitly included throughout.

- job advertisements and learner recruitment materials must use inclusive language and avoid discriminatory requirements unless objectively justified;
- candidate selection, shortlisting and employer introductions must be based on merit and role suitability;
- reasonable adjustments must be offered during recruitment and interview processes where required;
- employers and clients must not request discriminatory selection practices;
- third-party harassment or discrimination towards staff, candidates or learners will not be tolerated.

9. Inclusive Teaching, Learning and Assessment

- resources should reflect diverse people, roles, sectors and communities;
- stereotypes and assumptions should be challenged through teaching, discussion and modelling of professional behaviour;
- teaching methods should support different starting points, confidence levels, learning preferences and declared or emerging support needs;
- staff should use respectful language and avoid unnecessary jargon or exclusionary terminology;
- online and blended learning must consider accessibility, digital inclusion, safeguarding and online safety;
- assessment arrangements should follow awarding organisation rules and consider reasonable adjustments where required.

10. Reasonable Adjustments and Accessibility

Quack will make reasonable adjustments where a disabled person, learner or candidate would otherwise be placed at a substantial disadvantage. Adjustments may relate to communication, premises, resources, teaching approach, assessment arrangements, interviews, online delivery, equipment, timing, support or progression activity.

Adjustment decisions should consider individual need, evidence available, learner or candidate preference, practicality, effectiveness, health and safety, qualification integrity and any awarding organisation requirements.

11. Roles and Responsibilities

| Role | Key responsibilities | Evidence / assurance |
|---------------------------|------------------------------------------------------------------------------------------------------------------|-----------------------------------------------|
| Senior Leadership Team | Set inclusive culture, approve policy, review monitoring evidence and ensure improvement actions are resourced. | SLT review, QIP, SAR, meeting records. |
| Quality & Compliance Lead | Monitor learner-related EDI evidence, learner voice, support records, complaints and quality assurance activity. | QA sampling, learner voice, QIP updates. |
| Managers | Apply the policy consistently, investigate concerns, support reasonable adjustments and challenge poor practice. | Management records, HR records, action plans. |

| | | |
|-----------------------------------------------------|------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------|
| Tutors / assessors | Promote inclusive learning, adapt delivery, challenge discriminatory conduct and record support needs. | OTLA, ILPs, learner files, support plans. |
| Recruitment / employer engagement staff | Ensure recruitment, candidate and employer processes are fair, inclusive and free from discriminatory practice. | Vacancy records, employer notes, candidate records. |
| All staff and workers | Treat people with dignity and respect, follow the policy, challenge inappropriate behaviour and report concerns. | Induction, CPD, supervision, staff records. |
| Learners, candidates, employers and partners | Engage respectfully, follow expected standards of conduct and raise concerns promptly. | Learner conduct records, complaints, employer feedback. |

12. Raising Concerns and Breaches

Any person who believes they have experienced or witnessed discrimination, harassment, victimisation, bullying or exclusion should raise the matter promptly. Staff may raise concerns with their manager or senior leader. Learners, candidates, employers and clients may use the Complaints Policy and Procedure or speak to an appropriate member of staff.

Quack will take concerns seriously, handle them sensitively and will not tolerate victimisation of anyone who raises a concern in good faith. Malicious or knowingly false allegations may be managed under relevant conduct procedures. Serious concerns may be escalated through safeguarding, disciplinary, complaints, subcontractor or employer partner routes as appropriate.

13. Monitoring, Quality Assurance and Review

Leaders will monitor EDI through staff records, recruitment activity, learner enrolment data, LLDD/health declarations, attendance, retention, achievement, progression, learner voice, staff surveys, complaints, quality assurance activity and QIP review. Where data identifies underrepresentation or unequal outcomes, leaders will consider targeted actions through curriculum planning, learner support, recruitment practice, employer engagement, staff CPD or quality improvement activity.

| Monitoring activity | Purpose | Frequency / trigger |
|----------------------------------------------|------------------------------------------------------------------------------------------------------------|---------------------------------------------|
| Learner participation data | Review whether access to provision is fair and inclusive across learner groups. | Cohort, contract and SAR/QIP cycle. |
| Attendance, retention and achievement | Identify gaps or barriers affecting participation and success. | Monthly/contract monitoring. |
| Progression and destination data | Check whether learners from different groups progress equitably into interviews, jobs or further learning. | Progression reviews and contract reporting. |
| Learner voice and complaints | Identify inclusion themes, learner experience and areas for improvement. | Mid-point, endpoint and as required. |
| Teaching and learner file QA | Check inclusive teaching, support plans, reasonable adjustments and evidence of impact. | OTLA, IQA, file review. |

Appendix A: EDI Monitoring Checklist

- Are learner recruitment materials inclusive and accessible?
- Are eligibility and suitability decisions based on objective criteria?
- Are LLDD/health declarations and reasonable adjustments reviewed appropriately?
- Are attendance, retention, achievement and progression outcomes monitored by learner group?
- Are staff confident to challenge discrimination, harassment and victimisation?
- Are EDI themes reflected in learner voice, complaints, OTLA, QIP and SAR activity?
- Are employer partners clear that discriminatory recruitment or interview practices will not be accepted?

Appendix B: Version Control

| Version | Date | Author / owner | Summary of change | Next review |
|---------|--------------|----------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|
| 1.0 | October 2024 | Dion Bishop | Original policy. | October 2025 |
| 2.0 | June 2026 | Dion Bishop | Full rewrite following funder feedback; expanded scope to learners, funded programmes, Skills Bootcamps, candidates, clients, employers and partners; strengthened monitoring and quality assurance. | June 2027 |

Reference framework: This policy should be read alongside the provider's safeguarding, Prevent, data protection, information security, learner support, EDI, assessment, malpractice, learner conduct and quality assurance documentation.

External reference sources considered: Equality Act 2010, UK GDPR/Data Protection Act 2018, statutory Prevent Duty guidance, awarding organisation requirements, funder requirements and Ofsted further education and skills inspection materials where relevant.