



Communities & Neighbourhoods Trust, Employment & Training

Equality, Diversity and Inclusion Policy

Version 8

Directorate:	Poplar HARCA - Communities and Neighbourhoods Trust - Employment and Training Services
Validated by:	Tanzeem Ahmed

This Policy applies to the Employment and Training Services of the Community and Neighbourhood (CaN) Trust which is a subsidiary charity of Poplar HARCA. The policy will be reviewed on an annual basis. Poplar HARCA reserves the right to amend this policy, following consultation, where appropriate.

Date last updated:	November 2025
Date of next review:	November 2026

Includes: Reasonable Adjustment

1. What is the policy about?

This policy statement outlines the philosophy of equality for all. This policy is available on request and referenced on our website. Staff, learners and other stakeholders are made aware of our policy during induction and through our website.

2. Who is the policy for?

All staff, learners and other stakeholders.

Our staff and learners complete a robust initial induction which includes access to the policy and a check of understanding of the policy. If changes are implemented, they will be presented with the updates. We will ensure that all employers and other stakeholders with whom we work are aware of our commitment to Equality, Diversity and Inclusion and the expectation that they will reflect this ethos when working in partnership regarding all

education provision. A copy of our policy and our commitment is promoted through our website.

3. Policy statement

This document describes the minimum standards and guidance relating to developing a cooperative and non-discriminatory environment which is both supportive and challenging and dealing with instances of harassment, bullying and discrimination.

At Poplar HARCA/Can Trust we believe that all staff and learners must be equally respected and treated as individuals, taking positive account of age, gender, religion or belief, ethnic origin, cultural origin, sexual preferences, disability, pregnancy or maternity and marital status. We will constantly seek to apply this principle to all our policies, procedures, delivery and interactions across all our work.

The Ofsted Education Inspection Framework (EIF)

This sets out clear guidance for Education providers in terms of how EDI is embedded across all four of the judgement areas.

Some of the specific inspection-focus implications around EDI include:

- Inspectors will evaluate whether a provider creates an inclusive culture, i.e., one that is welcoming of all learners, including those with protected characteristics, and one that removes barriers to access.
- Inspectors will look at how providers respond to bullying, harassment, discrimination, and whether the provider fosters good relations among learners with different characteristics.
- The curriculum: it is expected to serve *all* learners, including those with protected characteristics and disadvantaged groups — the entitlement to high-quality education applies equally to all.
- Inspectors will hold providers to account if practices or policies unlawfully discriminate (directly or indirectly) against learners or groups with protected characteristics.

4. Commitment to Equality, Diversity and Inclusion

The Employment and Training service is dedicated to fostering an inclusive environment where all learners are treated with dignity and respect. In accordance with the **Equality Act 2010**, we are committed to eliminating discrimination, harassment, and victimisation based on protected characteristics, including:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership

- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

We strive to ensure that all students have equal access to opportunities and are encouraged to participate in all activities, regardless of their background or identity. Additional support needs for learners are identified during enrolment, and these are taken into account in the delivery of our services. Positive support for a learner's home language and cultures helps to instil respectful behaviour and this also reflected in curriculum design. Staff and students also have access to spaces for the use of faith-related activity.

5. Code of Conduct

The organisation will not allow harassment or bullying to learners or staff. This can include unwelcome comments or behaviour, repetitive criticism, intimidation, insults, aggression, undermining self-confidence or the misuse of power. Any action which makes the recipient feel upset, humiliated, threatened or vulnerable will not be acceptable. If the offensive behaviour is made by learners, an on-the-spot explanation of why it is not accepted will be made and the behaviour policy followed. Any breach of this policy may result in disciplinary action.

Please see our Behaviour for Learning, Bullying and Harassment and Complaints Policies for further information.

6. Definitions

Direct discrimination: means treating people less favourably because of one of the protected characteristics covered through the legislation.

Indirect discrimination: occurs when an unjustifiable requirement or condition, whether intentional or not affects adults or children from certain groups.

7. Policy requirements

All staff will follow this policy statement at all times. Managers and other staff will ensure that this statement is followed through supervision and quality assurance processes.

Staff Responsibilities

All Poplar HARCA/Can Trust staff have a responsibility to be aware of and implement the policy on Equality, Diversity and Inclusion by:

- Promoting a "challenge inequality and celebrate diversity" ethos
- Undertaking staff development appropriate to their role

- Promptly reporting any discriminatory issues, unfair treatment, poor practice or misconduct to the Equality and Diversity Champion
- Promoting equality and diversity in induction, teaching and at progress reviews

Management Responsibilities

Management and Trustees have a responsibility to:

- Ensure that all staff, learners, subcontractors and other stakeholders are aware of this policy and actively promote its implementation
- Promote learning to ensure participation is representative of the local, regional and national demographical data
- Ensure the learning environment is non-discriminatory and challenge negative behaviours towards people of any protected characteristics
- Embrace a whole approach to challenging inequality and celebrating diversity
- Ensure all staff are aware of the policy and ensure they receive appropriate and annual training and support to undertake their roles effectively
- If the Employment and Training Team is working with a partner and any equality and diversity issue arises, the Equality and Diversity Champion will work with the partners' appointed person to resolve the issue
- Ensure learning resources and marketing literature will promote fair and equal access to teaching, learning and assessment. Care will be taken to avoid the use of statements and stereotypes that might reasonably be expected to give offence on the grounds of any of the protected characteristics
- Collect data to analyse participation and achievement of under-represented groups by subject and programme area
- Agree EDIMs (equality and diversity impact measures) to promote participation and achievement of under-represented groups
- Process all data in accordance with the requirements of the Data Protection Act (May 2018)
- Learner registration forms ask to detail any additional support requirements that need to be in place. It is the responsibility of the Community Training Manager to ensure that reasonable adjustments are in place to accommodate those with additional support requirements

8. Equality for all

We are fully committed to providing a good and harmonious working environment that offers equality for all its learners and staff where everyone is treated with respect and dignity. Poplar HARCA/Can Trust recognises that the provision of equality in the workplace is not only good management practice; it also makes sound business sense. Our policy and processes will help all learners and employees develop their full potential so that the talents and resources will be fully utilised to maximize the efficiency of the organisation. Breaches of all policies including Equality and Diversity policy will result in the Company's disciplinary procedure being invoked against the individuals responsible or involved.

9. Recruitment of employees and learners (see Poplar HARCA's Recruitment procedure which is in line with Safer recruitment practices)

No vacancy will be advertised or publicised (internally or externally) in a way which discourages applications from any sector of the population. All applications will be considered on merit. Each individual will be assessed against a set of objectives using non-discriminatory criteria that will be directly related to the demands of the particular vacancy. All advertisements, application forms and other recruitment material will clearly state that we are an equal opportunities employer and will avoid statements or questions which tend to discourage applications for employment from any sector of the population.

All interviews will be conducted in accordance with the terms and spirit of this policy. The questions asked of candidates will be closely related to the selection criteria and will be asked in order to elicit information which will give a fair assessment of that particular applicant's ability to perform the tasks required by the vacancy. Specific questions will not be asked of candidates which make assumptions about a candidate's commitment or ability based on any of the grounds identified in the statement of this policy.

No one sector of the population will be disadvantaged or discriminated against in relation to the terms of employment offered or applied to them. Poplar HARCA/CaN Trust will, where appropriate, make reasonable adjustments to its arrangements for interviews and conditions of employment for disabled applicants where necessary to ensure that existing arrangements or conditions of employment do not place such applicants at a significant disadvantage to other applicants.

10. Promotion

Internal vacancies will, if possible, be filled by promotion. Poplar HARCA/CaN Trust will, however, consider enlarging the pool of applicants for promotion where this proves necessary to ensure that, in accordance with its policy, the pool of applicants is capable of fairly representing all sectors of the population. Applicants for promotion will be considered only on the basis of their skill, aptitude, experience and suitability for the vacancy.

11. Training for staff and learners

Employees involved in recruitment and the management or supervision of others will receive training to help them understand and comply with the law and the policy. No employee will be denied access to training on discriminatory grounds. Specific and/or additional training will be made available for disabled employees as is reasonably necessary.

12. Harassment on grounds of disability

Harassment of an individual who has a disability or who has had a disability in the past is unlawful. It is also contrary to the Company's policy, which seeks to ensure that people with

disabilities receive treatment that is fair, equitable and consistent with their skills and abilities.

In accordance with statutory requirements, the Company recognises that a person with a disability is someone who has or has had a physical or mental impairment that has a substantial and long-term adverse effect on his/her normal day-to-day activities. Therefore, depending on individual circumstances a person who has been seriously injured, has or had a progressive illness, significant learning difficulties or poor hearing, vision or mobility may be a person with a disability.

Harassment on grounds of disability may include the following:

- abusive or insensitive language
- inappropriate jokes or pranks
- non-verbal offensive gestures (e.g. staring at a particular affliction)
- inappropriate assumptions about the capabilities of a disabled person
- unfair allocation of work and responsibilities
- exclusion from normal workplace conversation or social events
- physical mistreatment (e.g. jostling or assault)

The above examples are not exhaustive, and each incident of harassment or discrimination will be viewed on its individual facts.

As part of our Equality, Diversity and Inclusion policy, we will make every effort, if a disabled person joins the Company or if an existing employee becomes disabled, to make such adjustments as are required by law, whether in their existing job or in a suitable available alternative.

The Company will seek to ensure that the needs of people with disabilities are considered generally in both the context of the Company's working practices and in the nature of its premises and continuing services.

13. Special Consideration / Reasonable Adjustment

Poplar HARCA/CaN Trust aims to facilitate open access to all qualifications for learners who are eligible for reasonable adjustment and/or special consideration in assessments, without compromising the assessment of the skills, knowledge, understanding or competence being measured. This will be achieved through:

- **Reasonable Adjustment:** This is agreed at the pre-assessment planning stage and any action that helps to reduce the effect of a disability or difficulty, which places the Learner at a substantial disadvantage in the assessment situation. Reasonable adjustments must not, however, affect the reliability or validity of assessment

outcomes nor must they give the learner an assessment advantage over other learners undertaking the same or similar assessments.

- **Special Consideration:** This is a post-assessment allowance to reflect temporary illness, injury or indisposition that occurred at the time of assessment. Any special consideration granted cannot remove the difficulty the Learner faced at the time of assessment and can only be a relatively small adjustment to ensure that the integrity of the assessment is not compromised. Special consideration cannot apply to “license to practice” units within a qualification, or to “license to practice” qualifications.

A reasonable adjustment helps to reduce the effect of a disability or difficulty that places the learner at a substantial disadvantage in the assessment situation.

Reasonable adjustments must not affect the validity or reliability of assessment outcomes, but may involve:

- Changing usual assessment arrangements
- Adapting assessment materials
- Providing assistance during assessment
- Re-organising the assessment physical environment
- Changing or adapting the assessment method
- Using assistive technology

Poplar HARCA/Can Trust understands that reasonable adjustments must be approved (internally or externally) and set in place prior to assessment commencing. It is an arrangement to give a learner access to a qualification.

The work produced following a reasonable adjustment must be assessed in the same way as the work from other learners.

Below are examples of reasonable adjustment. It is important to note that not all adjustments described below will be reasonable, permissible or practical in particular situations. The learner may not need, nor be allowed the same adjustment for all assessments.

Reasonable Adjustments permitted by Poplar HARCA/Can Trust may fall into the following categories:

- Changes to assessment conditions
- The use of mechanical and electronic aids
- Modification to the presentation of assessment material
- Alternative ways of presenting responses
- Use of access facilitators

Please note that a reasonable adjustment must never affect the validity or reliability of assessment, influence the outcome of assessment or give the earner(s) in question an unfair assessment advantage.

14. Examples of Reasonable Adjustments as defined by the above categories are listed below:

- Allowing extra time – e.g. assignment extensions
- Using a different assessment location
- Use of coloured overlays, low vision aids, CCTV
- Use of assistive software
- Assessment material in large format or Braille
- Readers / Scribes
- Practical Assistants, Transcribers, Promoters
- Assessment material on coloured paper or in audio format
- Language-modified assessment material
- British sign language (BSL)
- Use of ICT / Responses using electronic devices

15. Applying Reasonable Adjustment

Reasonable adjustments are approved before an assessment and are intended to allow attainment to be demonstrated. A learner does not have to be disabled (as defined by the Equality Act 2010) to qualify for reasonable adjustment; nor will every Learner who is disabled be entitled to reasonable adjustment. Allowing reasonable adjustment is dependent upon how it will facilitate access for the learner. A reasonable adjustment is intended to allow access to assessment but can only be granted where the adjustment does not:

- Affect the validity or reliability of the assessment
- Give the learners(s) in question an unfair advantage over other Learners taking the same of similar assessment
- Influence the final outcome of the assessment decision

Poplar HARCA/CaN trust applies reasonable adjustment in a transparent and unbiased manner. All reasonable adjustments made must be recorded using a reasonable adjustment form. Once completed, these would be held by Poplar HARCA/CaN Trust in the learner's file and shall be available at all times for scrutiny by the awarding body, if so requested.

All reasonable adjustments implemented by Poplar HARCA/CaN Trust are subject to meeting the requirements of the appropriate assessment strategy and assessment criteria for each qualification and awarding body. It is the responsibility of the Community Training Manager to ensure that any access arrangement implemented by the Employment and Training team on behalf of the learner, is based on firm evidence of a barrier to assessment. If further clarification is required in relation to the application of reasonable adjustment, the Employment and Training Team would contact the applicant by e-mail.

For all qualifications that are internally assessed, the Employment and Training Team will apply to the awarding body to request to implement a reasonable adjustment, but it must:

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- Only make reasonable adjustments that are in line with this policy
- Record all reasonable adjustments made on the appropriate forms
- Keep all forms on the appropriate Learner's record
- Make forms available to the awarding body as required

16. Assessing Achievement

Poplar HARCA/CaN Trust would ensure that for all internal assessments, achievement is given only for the skills demonstrated by the learner and that reasonable adjustments do not compromise the outcomes of assessment.

17. SEN

Poplar HARCA/CaN Trust note that a Statement of Special Educational Needs (SEN) does not automatically qualify the learner for reasonable adjustment to assessment, as the SEN statement may not contain a recent assessment of the needs; and the reasonable adjustment may compromise assessment.

Please see our Assessment Policy for further details.

18. Inappropriate use of Reasonable Adjustment

Poplar HARCA/CaN Trust understands that if they misuse the reasonable adjustment policy, then the awarding body will take appropriate action. Such action will range from advice and action for the centre through to the implementation of steps to manage assessment malpractice; this could ultimately lead to the recall of certificates, removal of qualification approval or removal of centre approval.

19. Victimisation

Victimisation occurs when a member of staff treats another member of staff less favourably because that other person has:

- brought proceedings alleging that he or she has been discriminated against contrary to this policy
- indicated that they intend to make such a claim or claims
- assisted a colleague to make a claim

Victimisation will not be tolerated under any circumstances and any member of staff who victimises another employee will be subject to the Company's disciplinary procedure. In

serious cases, such behaviour may constitute gross misconduct resulting in summary dismissal.

20. Complaints and disciplinary action

Where an employee or learner believes that he/she is being harassed, victimised or discriminated against contrary to the law or to the Equality, Diversity and Inclusion policy, he/she can invoke the complaints procedure, whether formal or informal, against the harasser or discriminator. Every complaint will be investigated and dealt with sympathetically without bias and as quickly as is practicable. Every effort will be made to ensure that individuals who make a complaint in good faith will not suffer any further detriment or be victimised because of making such a complaint. Any complaint of victimisation will be dealt with seriously, promptly and confidentially. Victimisation will result in disciplinary action, which may include summary dismissal.

Any acts of discrimination or acts which contravene this policy will result in the disciplinary procedure being invoked against the individuals responsible or involved. In severe cases, summary dismissal may be justified. All members of staff are encouraged to use the procedure outlined in this Policy if they are harassed, discriminated or victimised. We take all allegations seriously. However, if an allegation is made which the Company (after investigation) believes has been made dishonestly or maliciously, the Company may invoke the disciplinary procedure against the complainant. In serious cases, such behaviour may constitute gross misconduct and result in summary dismissal.

Please see Complaints and Whistleblowing Policies for further information.