

Equality, Diversity and Inclusion Policy (Learners)

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Review period	Annual		
Related legislation and/or standards	Equality Act 2010		

Scope

This policy applies to learners, customers, and other third parties. ATC Training employees should refer to the policy in the employer handbook.

Purpose

This policy sets out our commitment to adhering to legislation and regulatory requirements as an employer and an independent training provider.

ATC Training fully supports the principle of equal opportunities and opposes all unlawful or unfair discrimination on the grounds of ability, age, colour, culture, disability, domestic circumstances, employment status, gender, marital/civil partnership status, nationality, political orientation, racial origin, religious beliefs, sexual orientation, social background, or any other grounds or status.

Definitions

Equality

Equality is ensuring that individuals or groups of individuals are not treated differently or less favourably on the basis of their specific protected characteristics, including race, gender, disability, religion or belief, sexual orientation, and age.

Promoting equality should remove discrimination in all of the aforementioned areas. Bullying, harassment or victimisation are also considered as equality and diversity issues.

Protected Characteristics

The Equality Act (2010) covers and protects people from discrimination based on nine “protected characteristics”. They are as follows:

- Age
- Disability
- Gender Reassignment
- Marriage & Civil Partnerships
- Pregnancy and Maternity
- Race
- Religion or Belief
- Gender
- Sexual Orientation

Diversity

Diversity aims to recognise, respect and value people’s differences to contribute and realise their full potential by promoting an inclusive culture for all staff and students.

Discrimination

Discrimination is the treatment or consideration of, or making a distinction in favour of or against, a person or thing based on the group, class, or category to which that person or thing is perceived to belong rather than on individual merit.

Inclusion

Inclusion is the practice of accepting someone for who they are and making changes accordingly. It promotes equality of opportunity and ensures that everyone's needs are met.

Commitments

We are committed to ensuring that equality, diversity and inclusion are promoted in all areas of our services, and that unlawful or unfair discrimination, whether direct or indirect, is eliminated. We will ensure that:

- this policy is made freely available to employees, associates, employers and learners.
- the widest possible diversity of learners can access the content and assessment of our products and services.
- the entry requirements, content and assessment of our products and services are appropriate to the knowledge, understanding and skills specified and do not act as unnecessary barriers to achievement.
- all our products and services will ensure fair assessment for all learners.
- the language we use in our materials is clear, free from bias and appropriate to the target group.
- We aim to produce material that does not cause offences and will review against this policy.
- we will always support and demonstrate the principles of equality and diversity, and
- We will always adopt a zero-tolerance approach to bullying, harassment, victimisation, and unlawful discrimination against our learners.

Responsibilities

Leaders and Management should:

- Ensure that all employees and associates are fully aware of their responsibilities through training, access to policies, and communication of changes.
- guide any areas that need clarification.
- ensure that all employees and associates know their responsibilities regarding equality and diversity.

Employees and associates should:

- Follow all aspects of this policy.
- Make suggestions for improvement of this policy.
- Ensure this policy is available for learners upon request, e.g. a printed hard copy of through online access to the website.

Learners and other customers should:

- Follow all aspects of this policy.
- Ensure their actions do not cause offence or harm to other learners.
- Treat other learners and ATC Training employees or associates with respect.

Reporting and Monitoring

If you have a concern regarding Equality, Diversity and Inclusion please contact us at support@atctraining.co.uk or your named contact. We will ensure that we regularly monitor Equality, Diversity and Inclusion practices including:

- recruitment practices.
- training.
- checking that policies are up to date and relevant; and
- reviewing the current procedures in place.

This policy will be reviewed annually.

Harassment

Policy Statement

Harassment damages the working environment and can have a devastating effect on the health, confidence, morale and performance of those affected by it. It may also have a damaging effect on other staff, not themselves the object of unwanted behaviour, who are witness to it or who have knowledge of the behaviour. All staff are entitled to a working environment which respects their personal dignity and which is free from such objectionable conduct. Harassment is a disciplinary offence and incidents will be dealt with under the disciplinary procedure.

The law requires employers to take reasonable steps to prevent sexual harassment of their workers. We take action to prevent sexual harassment from occurring and have clear reporting procedures for our staff to make a complaint about sexual harassment. If you have been sexually harassed, or you have witnessed sexual harassment, we encourage you to tell us so that we can deal with the matter swiftly.

What is Harassment?

Harassment can be either:

- a) Unwanted conduct whether verbal or not, which is of a sexual or racial nature, or other conduct based on someone's race and/or gender which affects the dignity of men or women at work, or
- b) Bullying of colleagues, especially junior colleagues by intimidatory behaviour, or
- c) Unfavourable conduct at work, whether verbal or non-verbal, towards someone based on his/her disability which could affect his/her dignity at work.

A single incident can amount to harassment if sufficiently grave.

Examples of harassment or bullying would include sexual or racial banter, the display of material with sexual or racial overtones (even if not directed at the complainant); sarcastic personal remarks about colleagues, especially those reporting to you; over-demanding or unreasonable requirements.

What is Sexual Harassment?

Sexual harassment takes many forms but whatever form it takes, it is unlawful under the Equality Act 2010 as amended. We will not tolerate it.

Sexual harassment is unwanted conduct of a sexual nature which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person. It also covers treating someone less favourably because they have submitted to or refused to submit to unwanted conduct of a sexual nature, or that is related to gender reassignment or sex.

Sexual harassment does not need to occur in person. It can occur via digital means including social media sites or channels e.g. Whatsapp. Someone may be sexually harassed even if they were not the target of the behaviour. Examples of sexual harassment include, but are not limited to:

- a) sexual comments or jokes, which may be referred to as 'banter'
- b) displaying sexually graphic pictures, posters or photos

- a) suggestive looks, staring or leering
- b) propositions and sexual advances
- c) making promises in return for sexual favours
- d) sexual gestures
- e) intrusive questions about a person's private or sex life or a person discussing their own sex life
- f) sexual posts or contact in online communications including on social media
- g) spreading sexual rumours about a person
- h) sending sexually explicit emails, text messages or messages via other social media
- i) unwelcome touching, hugging, massaging or kissing

Third-Part Sexual Harassment

Third-party sexual harassment occurs when one of our workforce is subjected to sexual harassment by someone who is not part of our workforce but who is encountered in connection with work. This includes our customers, suppliers, members of the public, candidates, friends and family of colleagues, delegates at a conference, audiences, self-employed contractors etc).

Third-party sexual harassment of our workforce is unlawful and will not be tolerated. The law requires employers to take steps to prevent sexual harassment by third parties.

In order to prevent third-party sexual harassment from occurring, we will:

- a) Ensure ground rules are established at the start of any tutor-led sessions, including references to acceptable behaviour.
- b) Bring to the learner's attention our learner handbook and policies, which include behaviour and conduct.
- c) Exercise our right to remove candidates from courses should their behaviour raise concerns.

We will not tolerate sexual harassment by any member of our workforce against a third party. Instances of sexual harassment of this kind may lead to disciplinary action, including termination of employment.

Learners can raise any concerns or complaints to safeguarding@atctraining.co.uk.

Version History

Version	Reason for publication/change	Date	Author
1.3	Policy review and reformatting inc. version history table.	26/05/2023	AC
1.4	Additional sections added for Harassment and Equal Opportunities.	25/07/2023	AC
1.5	Policy review, added review period. Removed employee-related policies as now included in the employee handbook. Added information about preventing sexual harassment.	11/11/2024	AC
1.6	Annual review, no changes.	09/10/2025	AC