



EQUALITY, DIVERSION, INCLUSION & Belonging



Transworld Publications Services Ltd t/a Protocol Consultancy Services (known as Protocol Group) is committed to equal opportunities for all and supports inclusive practice throughout all of our activities in a safe and secure learning environment.



PROTOCOL GROUP

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Equal Opportunities, Diversity, Inclusion and Belonging Policy

Principle Statement

Transworld Publications Services Ltd t/a Protocol Consultancy Services (known as Protocol Group) is committed to equal opportunities for all and supports inclusive practice throughout all of our activities in a safe and secure learning environment. Our policy is to ensure that no person trained or associated with Protocol Group receives less favourable treatment on the grounds of nationality, religion, reverence, racial or ethnic origin, language or culture, disability including limitations to physical access or resources, marital status, responsibility for dependants, age, gender, including pregnant woman, nursing mother, or person on maternity/paternity leave, gender identity, sexual orientation or preference, ability in literacy or numeracy, technical knowledge or skill, behavioural or learning difficulties, lack of ability or insufficient formal qualifications, being an ex-offender, ex substance abuse, social isolation and homelessness, trade union membership, unemployment, contract worker, asylum-seeking status or for any other identifiable discriminatory cause.

We believe that all learners and staff should have a sense of belonging: feeling respected, valued for who they are; feeling a level of supportive energy and commitment from others so that they do their best.” It is about valuing all individuals, giving equal access and opportunity to all and removing discrimination and other barriers to involvement. Our mission is Aim High, achieve More for all and excellence in everything.

We believe that having a physical disability does not prevent staff from carrying out their duties. Protocol offers flexible working patterns, including changes to start and finish times and adaptable break times. Changing their working environment, for example providing a quiet place to work, adapting workspace, providing reasonable adjustment, accessing support such as ‘Access to Work’, working with them to create an action plan to help them manage their condition.

We believe in human rights for all those connected with this organisation and all members of society. No action shall be taken against them by any person connected with Protocol Group which would devalue their contribution to society as a whole and to this organisation or lead to a loss of self-respect for them or respect for them from others.

We believe in equal pay for both men and women. By law, male and female employees must get equal pay for doing 'equal work'. This is work that equal pay law classes as the same, similar, equivalent or of equal value. This means someone must not get less pay compared to someone who is both: the opposite sex.

We are dedicated to valuing diversity and creating a positive culture within Protocol. We have a vision that is vibrant, fair, inclusive and diverse, and where there is respect and understanding. We welcome applicants from diverse backgrounds and we want our staff to be proud of their shared values and identity and to work together to secure our vision. We believe that differences should be recognised, supported and celebrated. This statement is a demonstration of our commitment to be an employer of choice and it builds on the excellent work we have already undertaken and further enhances our dedication for diversity and equality.

However, we believe in order and social discipline both in society and in the organisation of work-based training. We hold the right to request a standard of dress and behaviour as appropriate with circumstance and safety at work.

The results of all initial assessments for learners and any tests for staff will always be given to them, and always in surroundings that preserve individual confidentiality.

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Furthermore, we confirm that we will, if unable to help them specifically, refer them to other agencies or organisations so that a continuous pathway of help and advice is formed.

We will comply fully with the letter and intention of all laws and directives. We are committed to the fulfilment of all agreements, regulations and Acts which may have implications for our role in vocational training. Amongst these are the:

- Equal Pay Act 1970 (EPA) amended 1983
- The Sex Discrimination Acts 1975 (SDA) & amended 1986
- European Community Equal Treatment Directive 1976
- Race Relations Act 1976 (amendment) Regulations 2003
- Disability Discrimination Act 1996
- Protection from Harassment Act 1997
- Human Rights Act 1998
- Treaty of Amsterdam 1997
- The Rehabilitation of Offenders Act 1974
- Race Relations Act 1976
- Employment Acts 1988 – 1989
- Health and Safety at Work Act 1974
- Employment Rights Act 1996
- Public Interest Disclosures Act 1998
- Data Protection Act 1998
- Working Time Regulations 1998
- Sex Discrimination (Gender Reassignment) Regulations 1999
- Part Time Workers Regulations 2000
- Race Relations (Amendment) Act 2000 & 2003
- Special Education Needs and Disability Act (SENDA) 2001
- The Race Relations Act 1976 (Amendment) Regulations 2003
- The Employment Equality (Religion or Belief) Regulations 03-Dec 03
- The Employment Equality (Sexual Orientation) Regulations 03-Dec 03
- The Disability Discrimination Act 95 (Amendment) Regulations 03-Oct 04
- The Employment Act 2002 (Dispute Resolution) Regulations 04-Oct 04
- The Employment Relations Act 2004 – (Parts only) Oct 04
- Gender Recognition Act 2004
- Children's Act 2004
- Equality Act 2006
- Work and Families Act 2006 (part of Employment Act 2002)
- Age- Employment and Vocational training Law – Oct 2006
- Racial and Religious Hatred Act 2006
- Race Employment Equality Code 2006
- Disability – Public Duty Code of Practice Dec 2006
- The Gender Equality Duty- April 2007
- Equality Act 2010 including Public Sector Equality Duty
Updates since 2010 and published Feb 2013 incorporating some of the above legislation
- GDPR (General Data Protection Regulation) May 2018

Equality Act provisions which came into force in April 2011:

- positive action - recruitment and promotion
- public sector Equality Duty

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The Equality Act 2010 includes provisions that ban age discrimination against adults in the provision of services and public functions. The ban came into force on 1 October 2012 and it is now unlawful to discriminate on the basis of age unless:

- the practice is covered by an exception from the ban
- good reason can be shown for the differential treatment ('objective justification')

The ban on age discrimination is designed to ensure that the new law prohibits only harmful treatment that results in genuinely unfair discrimination because of age. It does not outlaw the many instances of different treatment that are justifiable or beneficial.

The responsibility for compliance and for the positive attitude required to ensure success is laid upon all individuals within the organisation. All external persons connected with Protocol Group are encouraged to hold the same responsibility and commitment.

To protect staff and learners alike there will be procedures to ensure that each person has a redress against harassment and bullying at work or during any part of training. There will be procedures for redress of complaint, and for the re-evaluation of decisions taken by training advisers in accordance with the Common Accord following complaints from learners. A Complaints Book will be kept, regularly reviewed and the causes of complaints analysed to prevent reoccurrence. Anyone whose personal data is stored on a Protocol Group computer will have right of access to it. Anyone who is permitted to take up copyright of designed material will have that copyright honoured. Health and safety at work will be paramount. These procedures are listed below and can be found in the staff procedures file under the appropriate headings:

Protocol Group Equal Opportunities Procedures include:

- Advice and guidance for redress against harassment and bullying.
- Advice and guidance on making complaints and redressing grievances.
- The right to have a friend, supporter, or mentor present during interviews.
- The right to join a trade union.
- The appeals procedure.
- Access to personal data.
- Copyright of designed training notes and other materials.
- Health and safety – procedure for identification and notification of omissions.
- Advice and guidance on referrals of staff and learners to other agencies and organisations for further help and advice.
- Procedure for staff recruitment, selection, promotion, training, redundancy and retirement or dismissal.
- Procedure for learners' recruitment including avoidance of stereotyping.
- Guidance on advice and permissions to staff and learners concerning religious beliefs, including customs, festivals and holy days.
- Advice and guidance on the rehabilitation of ex-offenders.
- E–Safety/Restrictions in the use of the Internet – limitations on access to certain websites.
- Advice and guidance on the display of potentially offensive material
- Advice and guidance on the design and content of training materials and sessions
- Staff and learners' code of conduct

There will be control of the quality and wording of advertising and publicity. There will be proper procedures for the recruitment of staff and learners, which meet and if possible, exceed the requirements for equality of opportunity.

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The facilities used by learners will be subject to regular formal review and necessary improvement. Learners will be encouraged to discuss their concerns both formally and informally in private if requested.

Training notes will be checked to ensure the contents do not offend any group. The use of electronic communication will be monitored to ensure that no offensive material is introduced into the training or working environment and that personal privacy of data is protected. Management strategies and techniques will be regularly evaluated to ensure fairness of conduct. The structure of training and its content will be evaluated to ensure that it does not offend or infringe upon any person's rights. The workplace or work placement contract procedures will be examined periodically to ensure fairness. The wording of contracts or service level agreements will contain wording, which describes the equal opportunities policy of Protocol Group in an easily understandable way to any external organisation. The wording of contracts for full and part-time staff including temporary and sessional staff and contracted consultants will also contain details of the policy. A copy of the policy will be set out in the staff section on Moodle, for all staff to read. Employers and Learners will also have access to this policy via Moodle and the Business development Team will ensure all employers also have their own E & D policy for Apprenticeships and Study Programme to access. The working of the equality opportunities policy will be monitored by the MD on a monthly basis and on an overall annual basis. Statistics will be gathered, analysed and used by managers to improve policy implementation and to increase the level of proactivity.

The dress code will take into account concerns by any person who's religious or ethnic customs require a particular type of dress. Fasting periods and other periodic religious or ethnic requirements including time and location and privacy for prayer will also be considered on a case-by-case basis. Learners who wish to discuss issues they consider important in connection with religious festivals and celebrations should talk to the Course training adviser or MD.

Harassment and bullying

Harassment is an unacceptable form of behaviour. All staff and learners can consider themselves fully protected by our anti-harassment and bullying policy at Protocol Group, at workplaces or work placements or at any other place where work or training takes place. The policy applies to staff and learners connected with this organisation even when they are on off-duty time. The occurrence of harassment must be reported to Protocol Group, without fear or favour, even if there is a separate policy in place at a learners' workplace or work placement, which requires the incident to be reported to a workplace manager or supervisor. Because learners are in receipt of government funding for their training, they are to be separately protected by Protocol Group at all times. Learners are to be politely questioned in confidence on each occasion of formal review and at other appropriate times as to their level of contentment with their workplace or work placement. Confidential records of discussions concerning these aspects must be recorded and stored separately from the documentation connected with individual training plans. Staff complaints about harassment will also be treated fully in confidence. Wherever possible a person not involved with the learner or staff member on a day-to-day basis will investigate possible concerns. This person will be known as the confidential mentor. References to complaints of any kind must be recorded in the Protocol Group complaints log. However, specific confidential aspects of complaints should be noted and filed in a sealed confidential envelope and deposited within the person's personal file and held by the MD in a secure place.

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What is Harassment?

Any unacceptable or unwarranted behaviour which disrupts the quality of life or work of an individual. Although the examples set out below are not exclusive, they show types of unacceptable conduct which are completely against our policy:

- ❖ Successive or single acts of bullying
- ❖ Verbal or physical abuse
- ❖ Ill-treatment
- ❖ Any offensive or oppressive act.
- ❖ Any defamatory remark.
- ❖ Causing a person to avoid or want to avoid any social, work, or training environment through poor behaviour towards them.
- ❖ Ill-advised comments or harassment about any person's sex, sexual orientation (including lesbian, male homosexual or transitional sexual status), religion or belief, race or ethnic origin, disability or age, marital status.
- ❖ Any abuse of a position of authority by a staff member over a learner or to another staff member.
- ❖ Being under the influence of alcohol will be considered to aggravate the offence and will not constitute an excuse for it.

Harassing Aspects of Potentially Offensive Displayed Graphic Materials

Our policy is that it cannot be assumed that because one person does not find such material offensive, so all must put up with it. We will not put anyone in a situation in which they have to request that such items be removed. You are not to make available:

- ❖ The display of sexual material on posters or in any other form including graffiti.
- ❖ Any written or printed material intended to show that any person is inferior in any way, including any sexual or racist aspect.
- ❖ The use of 'playboy' or 'playgirl' style calendars or other potentially offensive magazines or pictures including those of a soft pornographic nature.

Managers and supervisors of learners at external workplaces or work placements are to be asked directly and without embarrassment, fear or favour to remove such items from the workplaces of government funded learners as part of the external company's commitment to the equality of opportunity and protection from harassment.

To reiterate, no learner will be put in a position of having to ask that material offensive to them be removed.

False Accusation

Protocol Group will hold it as an offence against this equal opportunities policy if any person gives a false accusation against another learner or staff member.

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Accusations of a false nature can be deemed as legally defamatory. All those involved in the investigation of any complaint must keep the matter strictly confidential.

Right to Advice and Counselling

Protocol Group will ensure that all persons have a right to advice and to legal protection. This will be achieved by either by a person appointed by Protocol Group giving advice in confidence to any learner or staff member, or by referral to an external specialist source such as a solicitor or counselling agency. Time off from training or staff work will be given to attend external appointments until such matters are resolved.

Positive Discrimination against Gender Stereotyping

All staff shall make every effort to inform learners of opportunities to break out of stereotypical roles at work. Vocational training providers are permitted by law to be proactive in trying to introduce men and women into areas of work not considered normal activity for a particular sex. Examples of this would be to encourage more men into hairdressing and care homework, more women into information technology and building work. Stereotyping can occur within working environments too – for example, expecting women always to make the tea or do washing up or expect men always to change light bulbs or mend electrical fuses or plugs. Staff are to be aware of these aspects and show an example to learners in how to combat them.

Staff and Learners' Interviews and Initial Assessments

Protocol Group has a policy that access to staff contracts and to training programmes is open and fair. People are to be told at the beginning of any interview that it is covered by the Protocol Group Equal Opportunities & Diversity Policy. They are to be told that if they consider the manner or questioning to be ill-advised or too personal or intrusive they should feel free to comment upon it without fear. Such questions can then be re-worded or avoided by interviewing staff as appropriate. No person shall be forced to put down any detail their application, which they are concerned, might lead to an infringement of their human rights.

Initial assessment or literacy, numeracy or other determiner of current ability will be carried out so that the results of the tests are kept confidential. These results will always be given to the learner concerned on a one-to-one basis in confidence. No unnecessary testing is to take place. Staff or learners who can show for educational reasons or reasons of previous experience or qualification that they already possess a skill or ability should not be tested for it initially. Should this ability or skill prove to be in need of refreshment later, then such a test can take place with the agreement of the staff member or learner.

Recognition of Prior Learning and Time Off-Work for Learning

Learner's previous experience and qualifications must be formally considered for the purposes of recognition of prior learning for national vocational qualifications. Staff will be entitled to training for the needs of their job and also for personal development. Learners and staff will be entitled to time for study. Staff are to negotiate time off-the-job for learners to carry out personal study for their programme or for formal training sessions at work or in the Protocol Group training centre.

Assessment

All assessment is based on performance and not influenced by gender, age, race, disability issues, etc. We also commit to access to fair assessment, and arrangements may be made

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for any learners with particular assessment requirements whilst ensuring that these do not compromise the integrity of the assessment. Requests for reasonable adjustments should be agreed in writing with Protocol as soon as possible in the programme, before being implemented so that Awarding organisations can be contacted. This information will be stored securely on the learner's confidential record.

Learners should also follow the Appeals Procedure if not happy with assessment decisions.

Health and Safety applies to everyone

All staff and learners will be protected from defects in their working environments, which fall below standards set out in the Health and Safety at Work Act. It is the duty of any staff member or learner to immediately point out unsafe equipment or situations. In the case of dangerous circumstances staff and learners are empowered to warn people to keep clear of any area. Bomb warning, advice on the handling of suspicious postal packets and fire practice and evacuation procedures will be made available to all. First Aiders will be trained and appointed. An Accident Book will be available. Learners and staff will be required to practice fire evacuation and assembly at designated points. The Public Liability Insurance certificate will be displayed and kept current.

Selection for Redundancy or Redeployment to another Post

All direct or indirect discrimination will be avoided during selection processes for any redundancies or for redeployment to other or new posts. Nursing mothers, those expecting or on maternity leave will all be protected according to statute.

Victimisation

No person, staff or learner shall be victimised as a result of them giving information about any act by a person who contravenes this Equal Opportunities & Diversity policy. Persons making allegations, which are proved to be false, will be dealt with in accordance with the staff procedures for dismissal. Any staff member who bullies or harasses another staff member or learner who they believe has made an accusation against them, whether it be proved or not, shall be liable to dismissal. All staff will be able to report matters detailed in the Public Interest Disclosure Act 1998 without fear.

Management Responsibility and Vicarious Liability

The managing director and all other managers and supervisors accept full responsibility for the discharge of the various laws and Acts of Parliament. They fully understand the implications for them of vicarious liability.

Cooperation by Staff, Employers and Learners

As a part of Protocol Group, you have a duty to cooperate and comply with any measures set out to improve or sustain the concept of equality of opportunity. You must report bullying and harassment. You must not encourage or allow others by omission to carry out any discriminatory act.

Staff, Employers and Learners – Right to Information

All staff, employers and learners will receive initial, regular and updating briefings on all appropriate aspects for equal opportunities, rights and responsibilities. As long as you are a member of this organisation or a participant in one of its training programmes you have an obligation to act in accordance with the ethos set out in this policy at all times, including your time away from work or training.

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Data Management

Protocol will collect equal opportunities information for review and analysis to inform business strategy from initial interviews, registration, success measures and leavers and may be shared with awarding bodies and funding sources. This data will help in narrowing any achievement gaps identified between groups of learners.

Queries, Concerns & Complaints

All queries and concerns about Equal Opportunities issues should be referred to the Equal Opportunities Co-ordinator Sue Tipton. The formal Complaints procedure can be found in the Learner Handbook and Staff Procedures file.

Staff Development

Protocol commits to providing Equal Opportunities & Diversity training at a minimum of annually at the EO Workshop for all staff. The information from the workshop may also be used for updating learners and employers where necessary.

Suggestions for Improvement

Please feel free to offer suggestions on the improvement of equality opportunities systems and procedures within this organisation. Talk to your Equal Opportunities Coordinator who is Sue Tipton

Quality Assurance Review

This policy will be reviewed again in April 2024 or sooner if legislation or the Company require it.

Summary of our duties:

We are required to demonstrate the arrangements that will show how we will fulfil our equality duties to:

- identify functions and policies that are relevant to the sector
- set out arrangements to assess and consult on the likely impact of proposed policies on the promotion of equality
- train staff in equality and diversity
- gather information on our workforce data and set out how this information will be used
- publish information on our workforce data
- involve, consult and inform all staff
- involve, consult and inform diversity groups as and when required
- involve, consult and inform external equality and diversity specialist organisations
- work with external equality and diversity specialist organisations, leaders and other stakeholders to learn from best practice and to improve our work on diversity
- develop a Single Equality Scheme action plan
- review and monitor our objectives and actions in the action plan quarterly
- review and monitor our Single Equality Scheme annually
- internally audit our diversity work and Single Equality Scheme; and
- cover all protected characteristics where applicable as listed in relevant equality legislation

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Our Key Themes

1. Inclusive culture
2. Strong leadership
3. Managing and valuing diverse talents
4. Diverse and inclusive workforce
5. Belonging

1. Inclusive culture

We want to be an employer of choice. We want to be an organisation that is fair and understands the many different cultures and values of our staff, learners, partners and stakeholders. It means we should be confident that, throughout our work, the decisions and actions we take are free from bias or discrimination and everyone we come into contact with is treated fairly and with respect. We will endeavour to create an inclusive culture that challenges harassment and discrimination. Through our leadership initiatives, we will set clear expectations of how we should perform and behave, highlighting examples of good conduct and role models.

2. Strong leadership

We are all responsible for delivering our diversity, inclusion and equality commitments and that every member of staff knows what their responsibilities are. It means that there are clear and transparent lines of accountability and that our commitments are embedded throughout the organisation and we will ensure that equality and diversity maintain a high profile.

3. Managing and valuing diverse talents

We will build an inclusive workforce where all staff are valued for their individual talents. It means using our workforce diversity data, our staff survey responses, and listening to people so that we can understand and act where we identify any barriers to achievement and promotion for groups or individuals. We want to provide an environment in which all employees have the opportunity to achieve their potential. It means that we will address the developmental needs of all staff.

4. Diverse and inclusive workforce

We will recruit people from the widest range of backgrounds. When we undertake recruitment exercises, we will consider our staff profile using monitoring data and look at different methods of advertising and other recruitment methods to reach out to under-represented groups. We will continue to monitor our staff profile across all diversity strands, take action where necessary and report on our progress.

5. Belonging

We are committed to fostering a culture where everyone feels valued, respected, and included. We recognise that true inclusion goes beyond representation—it is about creating an environment where individuals feel safe, empowered, and a genuine sense of belonging. We strive to ensure that all voices are heard, perspectives are valued, and every individual has equal access to opportunities to thrive. Through continuous learning, open dialogue, and proactive engagement, we aim to build a workplace where everyone feels they truly belong

Please also see Single Equality Scheme Policy

Please also see Safeguarding and Prevent policy

Policy published date	April 2010
Date of last review	March 26
Next review due	March 27
Person responsible for policy and review	Quality & HR Manager ST

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