


EQUALITY & DIVERSITY POLICY

Date effective	Policy review date	Approver
09/02/2025	08/02/2026	Christina Chambers
ITT.POL.0004	V19	



Intertrain UK Ltd is committed to the Equality Act 2010, equality of opportunity to ensure that people are judged on their merits.

Definitions and/or Relevant Legislation

The Equality Act 2010 consolidates protection against discrimination on the grounds of:

Age: Where this is referred to, it refers to a person belonging to a particular age or range of ages.

Disability: A person has a disability if they have a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities. Under the Act a claimant does not have to show that their impairment affects a particular capacity such as mobility, speech, hearing, or eyesight.

Gender reassignment: The process of transitioning from one gender to another. The definition has changed so that people no longer have to be under medical supervision to be protected by the law. Gender Reassignment continues to cover those who intend to live permanently in a gender other than the one assigned at birth.

Marriage and civil partnership: In England, Wales and Scotland marriage is no longer restricted to a union between a man and a woman but now includes a marriage between a same-sex couple. Same-sex couples can also have their relationships legally recognised as 'civil partnerships'. Civil partners must not be treated less favourably than married couples (except where permitted by the Equality Act).

Pregnancy and maternity: Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

Race: Refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.

Religion and belief: Religion has the meaning usually given to it, but belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live for it to be included in the definition.

Sex: A man or a woman. The word 'gender' is often used in place of the word 'sex' in equality issues. 'Gender' does not appear in legislation (except for 'gender re-assignment' - see above) but 'sex discrimination' and 'gender discrimination' are generally interchangeable.

Sexual orientation: Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes. Assumptions and perceptions of a person's sexuality are also covered by law.

Compliance with The Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017

The Equality Act 2010 replaces previous anti-discrimination legislation with a single act. It aims to simplify the law, remove inconsistencies, and make it easier to understand and comply with. It also aims to strengthen the law and to help tackle discrimination and inequality. The majority of The Equality Act came into force on 1 October 2010.

The Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017

Came into force in March 2017 to ensure all public bodies help to make society fairer by tackling discrimination and providing equality of opportunity for all.

The above legislation requires public bodies to consider all individuals when carrying out their day-to-day work in shaping policy, service delivery and in relation to their own employees. It replaces the 3 previous public sector equality duties for race, disability and gender and covers the following protected characteristics that are recognised within The Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017, namely:

- Age
- Disability
- Gender Reassignment
- Pregnancy and Maternity
- Race (including ethnic or national origins, colour, or nationality)
- Religion or belief (including lack of belief)
- Sex
- Sexual orientation

The legislation also applies to marriage and civil partnership, but only in respect of the requirement to have due regard to the need to eliminate discrimination.

Public bodies, when carrying out their activities, to have due regard to the need to:

- Eliminate unlawful discrimination, bullying, harassment, victimisation, and other conduct prohibited by the Equality Act (2010)
- Advance equality of opportunity between people from different groups This involves covering the need to:
- Remove or minimise disadvantages experienced by people on account of their protected characteristics.
- Meet the needs of people who share the characteristics and people who do not share them.
- Encourage people who share the characteristics to participate in activities within where their participation is low.
- Foster good relations among people from different groups. This involves tackling discrimination and promoting understanding across the community.

The Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017

- The Equality Act 2010 also put in place a single public sector equality duty, which gives public authorities a legal responsibility to provide this protection and make decisions which are fair and transparent, including the allocation of public money.
- The Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017 enable public bodies to perform the Equality Duty more effectively. They are obliged to:
 - publish information to demonstrate compliance with the duty imposed by section 149 (1) of The Equality Act at least annually (by 30 March)
 - Set equality objectives at least every four years (to be published by 30 March 2019) which are specific and measurable.
- The information a public authority publishes must include, in particular, information relating to persons who share a relevant protected characteristic who are:
 - its employees
 - other persons affected by its policies and practices.

Other Relevant Legislation

Intertrain recognises its commitments in respect of the following associated legislation alongside associated codes of practice:

- The Human Rights Act 1998
- The Counterterrorism and Border Security Act 2019
- GDPR 2018
- 2014 amendments to the Rehabilitation of Offenders Act 1974
- Freedom of Information Act 2000

Intertrain strives to promote beliefs and images that positively reflects its commitment to advancing equality of opportunity and celebrating diversity. Intertrain does not tolerate any prejudicial behaviour by any member of its community and has a zero-tolerance policy to bullying, harassment and victimisation. Every step is taken to eliminate unlawful discrimination and foster good relations among all social groups. Intertrain is committed to ensuring that it does not discriminate either directly or indirectly against individuals on the grounds of age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership, and maternity and pregnancy.

Intertrain also aims to provide a service that does not discriminate against its clients, learners, apprentices, and customers in the means by which they can access the services and goods supplied by the Company. Intertrain believes that all employees clients, learners, apprentices, and customers are entitled to be treated with respect and dignity.

Intertrain are committed to ensuring that Equality, Diversity, and Inclusion are promoted through teaching and learning by:

- Informing all staff and learners about our commitment to Equality, Diversity, and Inclusion.
- Ensuring that the learner experience makes them more aware of equality issues.

- Ensuring that staff are working to narrow achievement gaps between different groups of students.

Specifically, Intertrain aims to ensure that no employee or learner/apprentice is subject to unlawful discrimination, either directly or indirectly, on the grounds of gender, race (including colour, nationality, or ethnic origin), disability, sexual orientation, marital or civil partnership status, part time status, age, religion or belief, pregnancy or maternity, or sexual orientation. This commitment applies to all aspects of employment, teaching & learning, including:

- Recruitment and selection, including advertisements, job descriptions, interview and selection procedures.
- Induction and probation for staff
- Staff Appraisal
- Staff Remuneration
- Staff Promotion and Training
- Staff Disciplinary and Grievances
- Recruitment, selection, and enrolment of learners
- Curriculum content and development
- Course delivery and assessment
- Teaching and learning materials and methods.
- External contracts
- Self-Assessment
- Learner Disciplinary
- Selection for redundancy.

Communicating this policy

All employees or learner/apprentice are instructed to follow the policy as soon as they join the business as part of the recruitment and/or learner induction process. All employees or learner/apprentice complete mandatory Equality and Diversity online training annually. This applies to all people and all aspects of their employment and/or training journey. The policy is communicated to all staff via the portal system including reviewed annual policies. The policy is promoted via Intertrain's website and is displayed across all centres.

Intertrain is committed to providing equal opportunities and celebrating diversity in all aspects of its work and to avoiding unlawful discrimination, harassment and victimisation to staff, learners and customers. Intertrain is committed to advancing equal opportunity between people from different groups. This involves considering the need to:

Equality: Means ensuring that everyone is treated equally i.e. that all students have the same right of access to resources. Consequently, to ensure equality of opportunity, individuals / groups may be treated differently.

Diversity: Is recognising that individuals and groups of people are different and that it is important to value and celebrate difference.

Direct Discrimination: Is treating someone less favourably than he/she would treat others because of a protected characteristic.

[The individual does not need to possess the protected characteristic]

Indirect Discrimination: Is where an employer/provider has a condition, rule, policy, or practice that applies to everyone but particularly disadvantages people who have a protected characteristic. [It can be justified if it is proportionate means of achieving legitimate reason]

Associative Discrimination: Is discrimination directed against someone who associates with another person that possesses a protected characteristic.

Perceptive Discrimination: Is direct discrimination against someone because they are thought (wrongly) to possess a protected characteristic.

Harassment: Is unwanted conduct related to a protected characteristic that has the purpose or effect of violating an employee's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual.

Victimisation: Is where an individual is subjected to a detriment because they make, or are suspected of making, or supporting a complaint or grievance under the Equality Act 2010. [No protection if a complaint has been maliciously made or supported an untrue complaint].

Third Party Discrimination: Protects employees who are harassed by clients, contractors of the employer/provider. An employer is liable if the conduct has occurred on at least two previous occasions, is aware it had taken place and had not taken reasonable steps to prevent it occurring.

Fundamental British Values: Staff and learners will actively embrace, promote and practice the fundamental British values of democracy, freedom of expression, rule of law and respect and tolerance for those with different faiths and beliefs on a daily basis. These values will be placed at the heart of the culture of Intertrain.

Prevent

There is no place for extremist views of any kind whether originating from internal sources – students, staff or leaders, or external sources (i.e. online or from specific groups or individuals). It is imperative that our students, staff and third parties (e.g. visitors and partners) see our organisation as safe place where they can discuss and explore controversial issues safely and in an unbiased way and where relevant organisational processes encourage and facilitate this. As a Group we recognise that extremism and exposure to extremist materials and influences can lead to poor outcomes for our learners. We also recognise that if we fail to challenge extremist views, we are failing to protect our learners and staff. Any prejudice, discrimination, or extremist views, including derogatory language, displayed by learners, staff, visitors or partners will always be challenged and where appropriate dealt with using the relevant disciplinary procedure. Where deemed necessary Intertrain will alert any concerns about extremism to partner agencies.

Positive Action

'Positive action' means the steps;

- that Intertrain can take to encourage people from groups with different needs or with a past record of disadvantage or low participation, to apply for positions within the Company or on courses that the company offer.
- Commit to raising achievement for all learner that enrol onto courses that intertrain offer.

If the company chooses to utilise positive action in recruitment, this will not be used to treat people with a protected characteristic more favourably, it will be used only in tie-break situations, when there are two candidates of equal merit applying for the same position.

Promotion of Policy

Intertrain will promote its E&D policy to all employees as part of the induction policy. Promotion to learners/apprentices will form part of their induction process. Our E&D policy is made available via our website, notice boards in all centres and in the handbooks for learners/apprentices and employees.

Monitoring

Intertrain will not tolerate unlawful discrimination harassment or victimisation of any kind in the working environment and will take positive action to prevent its occurrence.

To maintain its alignment, the Company will monitor its policies and will implement changes in order to improve them as social attitudes and legislation change. This commitment applies to all of the Company's employment policies and procedures, which includes this Equality and Diversity policy.

Reasonable Adjustments

The company has a duty to make reasonable adjustments to facilitate the employment of a disabled person.

If an employee has a disability and feels that any such adjustments could be made, they should refer to their line manager.

Equal Opportunities practice is developing constantly as social attitudes and legislation change. Intertrain will keep its policies and procedures under review and will implement changes where these could improve equality of opportunity and diversity. This commitment is applicable to all Intertrain's employment policies and procedures, as well as those specifically connected with Equal Opportunities.