

1. Introduction

This is a policy statement sets out Lavender International's (the Company) position on equality and diversity in the workplace and apprenticeship programmes. This document is not contractual but describes the way the company is committed to equality and diversity and equal opportunities, and how it will implement that commitment in accordance with the Equality Act 2010 and the Public Sector Equality Duty.

The Company is committed to the principles of equality and diversity in relation to groups and individuals. This includes:

- Directors, employees and subcontractors
- Job applicants
- Students
- Apprentices
- Customers
- Professional bodies
- Any person whom the company deals with

The Company fosters a workplace/learning environment where all employees and apprentices are able to prosper and advance based on the suitability and quality of their work alone.

This policy is based on the principles that all employees and apprentices should be treated with dignity and respect. There should be no unfair discrimination of employees, workers, apprentices, or associates of the Company on the basis of gender, race, ethnicity, nationality, health, age, sexual orientation, marital status, religious belief or philosophical belief.

The Company seeks to promote the policy and ensure that this is implemented in practice in all and every aspect of the business and its activities. The policy will take all reasonable steps to ensure that all decisions relating to recruitment, training, promotion, opportunities, provision of benefits and selection are made on the basis of objective and job-related criteria alone.

The Company will take all reasonable steps to ensure that any stakeholders and contractors comply with this policy. All employees, apprentices, workers and associates of the Company are asked to read this policy and are expected to comply with the provisions at all times.

The Company acknowledges the benefits of engaging with individuals, students, and apprentices from a range of backgrounds with different perspectives. This creates an inclusive workforce and learning environment, which leads to greater innovation and creativity.

2. Legislation

It is the duty of the Company to adhere to equality and diversity legislation along with several others in making provisions for equal opportunities. The Company will always comply with the relevant law as required; however, the company is committed to exceeding the minimum expected standards for equal opportunities wherever possible.

The Company will review annually and update this policy in line with any changes to the relevant legislation.

3. The Equality Act and Discrimination

The Company is opposed to all unfair and unjustified discrimination. Discrimination is defined by The Equality Act 2010 and can take the form of direct or indirect discrimination, perceived discrimination, associative, harassment (third party etc.) or victimisation. Any alleged incidents of discrimination will be addressed in accordance with the company's relevant harassment/bullying policies and disciplinary procedures etc. It is unlawful to discriminate against a person on the grounds of the following 'protected characteristics':

- Race, ethnicity and nationality
- Marriage
- Civil Partnership
- Pregnancy and maternity
- Disability
- Religious or philosophical belief
- Age
- Sexual orientation
- Sex
- Gender reassignment

Examples of direct discrimination include but are not limited to:

- Preventing an individual the opportunity of employment/promotion due to a protected characteristic.
- Treating an individual less favourably or poorly due to a protected characteristic.
- Excluding an individual from a group setting due to an associated protected characteristic. E.g., A family member is homosexual but the individual themselves is heterosexual.
- Mistaken belief in a protected characteristic and poor treatment of an individual because of it.

Indirect discrimination can take on the form of a procedure or rule that applies to all employees resulting in people who have protected characteristics becoming disadvantaged. For example, if the dress code for women prohibited headwear, then it discriminates against those who wear headscarves for their faith or belief. If the Company could not defend this rule for a legitimate purpose, then this would be classed as unlawful discrimination.

Employees may notify us through the grievance procedure outlined in the Company Handbook QD 344 if they feel they have been discriminated against. Students/apprentices, customers or any individual who has dealt with the Company who feel they have been discriminated against may do the same through the Company complaints procedure (QD 1002).

4. Harassment

As stated in the Harassment policy referenced in the Company Handbook QD 344, harassment in any form or circumstance will not be tolerated and is against company policy. Employees and apprentices will be informed of this policy through Induction, Training and Supervisory practices incorporated into the performance management system.

Any harassment on the basis of the Sex, Race, Disability, or any of the other protected characteristics constitutes as unlawful discrimination and is considered to be a potentially serious offence. This can be brought to attention and addressed through the company Disciplinary Procedure referenced in the Company Handbook QD 344. It is the duty of all employees, students/apprentices to employ this policy. Any breach of policy will be considered a misconduct and dealt with according to the seriousness of the offence.

The Company endeavours to make the workplace environment somewhere where apprentices and employees feel safe and confident enough to challenge inappropriate behaviour without fear of discrimination or further harassment. Individuals are encouraged to raise these issues with the Designated Safeguarding Officer and the Company has a separate Whistleblowing Policy (QD 1000) to ensure that safeguards of apprentices and employees are upheld.

5. Safeguarding

Equality and diversity, and equal opportunities are inherently linked to Safeguarding concerns. In accordance with the Safeguarding of Vulnerable Children and Adults Act 2006 and Every Child Matters guidance issued by the NSPCC, Safeguarding is the responsibility of all employees (for the purpose of this policy the term 'employees' includes Trust Directors and sub-contractors). The Company is committed to playing its part in the protection of its students/apprentices and vulnerable adults/children

by preventing, identifying and reporting harassment, discrimination, abuse and neglect.

The Safeguarding policy QD 996 is also in conjunction with the Prevent Duty policy and Forced Marriage guidelines.

6. Responsibilities

Director/Management Team

The Directors/Management Team have collective responsibility for the content, implementation and review of this policy. They are also responsible for leading by example in matters of equality and diversity and encouraging good practice across the organisation.

HR Leader

The Operations Director with day-to-day responsibility for HR is required to ensure that this policy is distributed to all employees, apprentices and operatives. They shall also ensure that managers understand the companies responsibilities and that the provisions of the policy are implemented on a day to day basis.

Managers/Supervisors

All employees who have line management responsibilities shall ensure that those employees, apprentices and operatives under their control comply with the requirements of this policy. They shall ensure that any breaches of the policy are investigated, recorded and, where necessary, formal disciplinary action takes. Where in doubt the matter should be referred to the Operations Director.

7. Disability Policy

The Company will, wherever possible, seek to make adjustments to accommodate issues relating to any employee's or participant's health, regardless of whether or not they have a disability.

The Company is committed to making available to employees who have a disability the same opportunities for recruitment, training, development and promotion. The Company is aware of and committed to complying with its duty to make reasonable adjustments where a physical feature of the workplace a provision, or circumstance puts a disabled employee or participant as a substantial disability. The Company will provide auxiliary aids to a disabled employee where necessary and reasonable within

the confines of NDT and will make any further adjustments which are reasonable and which would reduce or negate the substantial disadvantage suffered.

The Company will seek to consult with an employee or participant in relation to any matter upon which their disability will have an impact and employees/apprentices are encouraged to bring to the attention of their designated manager or other appropriate manager any concerns or issues in the workplace or classroom as a result of a disability.

Any physical or mental disability a student or apprentice displays can also be judged and adapted for whilst the individual is learning. To help reduce the effects of disability in preparation for and during any assessments we will judge where in day-to-day practices adjustments need to be made.

To ensure that the student or apprentice is not negatively impacted by any circumstances out of their control, we will consider the use of special requirement measures, especially within examinations.

8. Family Friendly Policy

The Company is committed to providing terms and conditions of employment and apprenticeship that are compatible with an employee's/participant's family commitments.

The Company therefore encourages employees who are responsible for the upbringing of a child to use the company flexible working policy which supports their statutory right to flexible working.

Employees are also directed to the company policies which cover leave and pay in circumstances of maternity, paternity and adoption in the Employee handbook QD 344.

9. Subcontractor Organisations

The Company requires all subcontractor organisations to have in place a suitable equal opportunities policy and agree to comply with the Company's commitment to equality and diversity.

10. Implementation of our Commitment to Equal Opportunities and Public-Sector Equality Duty

The Company's goal is to eliminate any unlawful discrimination, including within the workplace or classroom environment, and to promote good relations between all peers. In accordance with the Public-sector Equality Duty Act 2011, equality of

opportunity will be practiced and implemented throughout the Company in the policy as we aim to:

- Tackle prejudice against those with protected characteristics.
- Encourage people with protected characteristics to interact in areas where previous participation has been limited.
- Increase equality of opportunity within the Company employment and apprenticeship by addressing any disadvantages/needs people with protected characteristics might encounter/have.
- Encourage interaction and good relationships between people with protected characteristics and those without.

This policy applies to:

- Recruitment and Selection
- Training and Development
- Appraisal, Promotion and Transfers
- Terms of Employment, Benefits and Facilities
- Training students and apprentices
- Grievance and Disciplinary Procedures
- Dismissals, Restructuring and Redundancies

11. Recruitment and Selection

All vacancies will be advertised internally and will be made accessible to all employees, including those on maternity, paternity or adoption leave. However, in circumstances of restructuring or redundancy it may be necessary to ring fence available vacancies for those employees whose position are at risk.

All recruitment decisions will be based on fair and objective criteria. The Company will not make assumptions that only certain types of people will be able to perform certain types of work. Any decision will be made based on an individual's suitability to perform that role in accordance with the policy.

All selected tests will be job specific and should be devised to test an individual's suitability to perform that particular role.

This standard is expected when looking to recruit a participant into any of our programmes. Should an employer refuse to adhere to the policy we will on no account work with them until changes have been made within their recruitment process and work practise.

Participants will be placed with provision in an area of the Company where the individual's skills can be utilised best. We will endeavour to create a participant base with a diverse staff team to support them and accommodate their needs.

Under The Equality Act 2010 positive action, it is legally required that, where possible and appropriate, the company provide support to any individual with a protected characteristic disadvantaged by or a victim of underrepresentation. The Company will take all reasonable steps to remove barriers to the recruitment process, selection process or employment where these may disadvantage applicants who have a certain protected characteristic. This may include making recruitment materials available in alternative formats, making adjustments to recruitment assessments, and making sure that vacancies are advertised in the local community in a manner that is visible to all demographic groups.

Where an applicant has a disability and believes that they will be disadvantaged by the Company recruitment process they should notify the Operations Director as soon as possible in order that the Company can make reasonable adjustments to the process with the objective of removing that disadvantage.

The Company acknowledges that equal opportunities monitoring of ethnic origin, disability, sex and other groups will be effective in implementing this policy for selection and recruitment practices. The Company will seek to ensure that those persons who make decisions on recruitment have read and understood this policy and where possible received relevant training on the principles of equal opportunities.

12. Training and Development

The Company will reflect its commitment to equality and diversity by training its employees to implement the policy and equal opportunities through equality of access to training and career development opportunities.

Further training in Safeguarding of vulnerable adults and children will be provided as well as Prevent and British values training (Counter Terrorism Act 2015) annually.

The availability of training and development opportunities will be determined by business needs, an employee's ability and the availability of suitable training courses.

All internal training and development programmes will be designed to comply with and development engagement with the provisions of this policy, and to ensure that they do not discriminate against or prejudice employees who have a particular protected characteristic.

Any teaching and training material provided by the company promotes Equality and Diversity within the workplace. Resources and materials will be prepared with the learner's needs in mind and that the individual's abilities and backgrounds are considered to promote equal opportunity. This is evidenced in the training materials, resources and training sessions students and apprentices are given.

Procedures such as Grievance, Disciplinary and Participant complaints will be introduced during training to encourage equal opportunities for employees and apprentices, promotion of employees and continued to growth of diverse representation within the workforce.

13. Appraisal, Promotion and Transfers

All appraisal processes and criteria will be devised to ensure that they are compliant and consistent with the provisions of this policy.

An employees and apprentices appraisal results should be based on individual merit, performance and ability. Appraisal results will be reviewed where there is evidence that opportunities for training, promotion and transfer are being offered disproportionately to one group of employees or apprentices.

Opportunities for promotion or transfer will be offered to employees and apprentices on the basis of the individual's ability and suitability for the new role only.

The Company will seek to eliminate or reduce the impact of any provision, criterion or practice relating to appraisal, promotion or transfer which indirectly puts employees or apprentices of a particular protected characteristic at a disadvantage. This includes apprenticeship examinations.

14. Terms of Employment and Apprenticeship: Benefits and Facilities

The Company will ensure that the terms of employment and apprenticeship, benefits and access to facilities available to employees and apprentices are provided in a way which is not unlawfully discriminatory.

In particular, part time and/or fixed term employees will receive the same terms (pro-rata where appropriate) of employment, benefits and access to facilities as full time and/or permanent employees.

Any discrepancy in rates of pay, benefits, bonus or commissions will be dependent on an employee's ability and merit only.

The Company is legally obliged to make reasonable adjustments for employees and apprentices who have a disability and to consider requests for flexible working conditions from certain employees and apprentices. It may be necessary, in order to comply with those obligations, to offer terms of employment/apprenticeship or facilities to those employees and apprentices which are preferential. To do so will not be in breach of the Company's commitment to equal opportunities but rather is a manifestation of that commitment.

Pay and bonus criteria will be developed and reviewed to ensure that they do not disadvantage employees or apprentices who have a particular protected characteristic.

15. Grievance and Disciplinary Procedures

An employee or participant will not be disciplined, dismissed or otherwise subjected to less favourable treatment for raising, in good faith, a grievance complaining of a breach of this policy, or otherwise making a complaint in relation to equal opportunities and discrimination. Likewise, if an employee or participant assists another person, in good faith, in relation to such grievance they will not be subjected to disciplinary procedures.

Employees and apprentices are also directed to the Company Whistleblowing Policy QD 1000 where they believe in good faith that a member, participant or associate of the company is acting in a manner which is unlawfully discriminatory. No employee or participant having a protected characteristic will be disciplined or dismissed for conduct or performance for which a person who did not have that particular protected characteristic would not be disciplined or dismissed, unless there is a genuine and lawful justification for different treatment.

Any disciplining or corrective actions will be carried out directly and supervised by senior management.

16. Restructuring and Redundancies

Redundancy and restructuring processes will be developed to ensure that they are not in themselves unlawfully discriminatory.

The Company will take all reasonably practicable steps to ensure that those employees responsible for administering restructuring and redundancy processes do not apply the relevant criteria in a way which is unlawfully discriminatory.

The Company will review its redundancy and restructuring procedures and criteria where there is evidence that it is prejudicing employees or apprentices who have a particular characteristic.

17. Implementation Action Plan

This Action Plan applies to Company employees and apprentice training staff and includes any sub-contracting individuals.

Key	Action Point	Frequency	Responsibility of
Remit of the Policy	Through consistent research keep informed of new equality legislation	Ongoing	Quality
	At a minimum of annually the policy shall be revised and updated. If there are any changes to equality and diversity legislation, then the policy shall be updated immediately.	Annually, or more frequently to accommodate changes in legislation	
Staff training and progress	Staff induction will cover: Equality, Diversity, Inclusion and Safeguarding as well as included Equality and Diversity training.	At Beginning of Employment	Operations Director Quality
	Mandatory internal equality and diversity training during week one of employment.	At Beginning of Employment	Operations Director Quality
	Employee reviews will involve: CPD, Individual career aspirations/goals, and ways to further the employee's career without impediment of discrimination or prejudice in accordance with the Equality and Diversity policy.	Ongoing	Operations Director Technical Director and Quality Manager
Apprentice understanding	Equality and Diversity as well as Safeguarding policies will be introduced during apprentice induction with a checklist used by the providing teacher to ensure full coverage of points, including anti-bullying and student/apprentice conduct. Further information is provided in the student handbook.	At Beginning of Apprenticeship	Teaching staff
	The policies shall be always made accessible to the students/apprentices and will be displayed upon notice boards throughout the training facilities. The policies can be found on Lavender International's website. Any Safeguarding concerns should be reported to the company Designated Safeguarding Officer (Operations Director).	Ongoing	Teaching staff
	All teaching materials and content should promote and value Equality and Diversity while also covering personal and social development within the syllabus. Students/apprentices will be encouraged to debate and discuss within the safety of the classroom environment and develop their communication and good relations to their peers.	Ongoing	Teaching staff
Reporting and impact assessment	Any discovered under-representation will be reported to necessary managers under the continuous review of the Equality and Diversity reports.	Monthly	Operations Director Quality
	Cohort examination has been used to create annual report to measure the success and representation of groups within the company.	Annually	Quality Operations Manager
	Consistent progress on any set actions within the plan will be observed continually.	Quarterly	Operations Manager Quality

18. Monitoring and Review

An Equality and Diversity report will be published annually to compare with different Participant groups apprentices within the programme and externally. The policy is reviewed annually to adhere to the company's policies and procedures.

A quarterly analysis of the effectiveness of the equality and diversity policy is undertaken to measure the effectiveness and delivery of the programme. This will be done to ensure we provide equality and opportunity in accordance with The Equality Act 2010.

A complete induction package will be provided for all students/apprentices which will endorse Equality and Diversity as well as Equality of Opportunity in all areas of learning programmes provided by Lavender International NDT, be they classroom based or work environments.

In a conscious effort to adapt and improve, an Equality and Diversity Action Plan will be written detailing any areas of adjustment that may be required and will include a realistic timescale for such improvement.

19. Student/Apprentice Feedback and Involvement

Student/apprentice feedback will be addressed promptly by a member of staff and referred to the quality department. Student/apprentice feedback is collected through feedback forms and surveys. This feedback will be used to ensure the service the Company provides meets all student/apprentices needs. Corrective measures will be applied if deemed necessary to ensure equal opportunities and excellent quality of training.

We will show how their feedback has been taken on board and applied by displaying the changes we have made on information boards located near student/apprentice areas. These will be updated every month.

Any marketing material or displays created to promote equality and diversity shall be written in English and developed with the student's/apprentice's creative input to encourage engagement with the policy.

20. Staff Feedback

Staff may present feedback during regular meetings, quarterly employee meetings, annual appraisals and the annual staff survey outlined in the Training – Staff Policy (QP03B).

21. Policy Review Log

This policy is to be reviewed annually with additional updates should new legislation be provided.

For related policies and procedures please see Lavender International NDT Limited. Prevent policy QD 995, Safeguarding policy QD 996 and IT acceptable use policy QD 992 and Training – Staff (QP03B).

Approved/Authorised by:



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