

# Mode Training Limited



[www.modetraining.co.uk](http://www.modetraining.co.uk)

## Equality Diversity and Inclusion Policy

Copies of all MTL policy and procedures may be obtained in large print please call 0151 709 4640 for a copy or alternatively e mail [admin@modetraining.co.uk](mailto:admin@modetraining.co.uk)

to be read and understood by:

Staff, Students, Employers, Work experience Providers and all relevant partners

## **Statement of Intent**

Mode Training Limited (MTL) makes a moral commitment to provide a positive and supportive working environment for our staff and an excellent teaching and learning experience for all of our learner/students. By adopting and implementing our Equality Diversity and Inclusion Policy we accept our responsibility for addressing and tackling the imbalances caused by disadvantage and discrimination. As a company we recognise that there is a great deal of work we still need to do. We hope that this policy will act as a means for carrying forward and developing strategies and procedures to ensure we are valued by all who are either employed, trained or work in partnership with MTL as a positive, forward-thinking company that truly embraces equality for all.

## **Overview of Equality Diversity and Inclusion**

### **The Equality Act 2010**

The Equality Act 2010 brings together a number of existing laws into one place so that it is easier to use. The law sets out the personal characteristics that are protected by the law and the behaviour that is unlawful. Simplifying legislation and harmonising protection for all of the characteristics covered will help our country become a fairer society, as an educational organisation it is our duty to ensure practices across our own company promote good practice.

Most of the new Equality Act was already in place in the previous anti-discrimination laws that it replaces. The nine equality laws which have now merged under The Equality Act 2010 are as follows:

- Equal Pay Act 1970
- Sex Discrimination Act 1975
- Race Relations Act 1976
- Disability Discrimination Act 1995
- Employment Equality (Religion or Belief) Regulations 2003
- Employment Equality (Sexual Orientation) Regulations 2003
- Employment Equality (Age) Regulations 2006
- Equality Act 2006, Part 2
- Equality Act (Sexual Orientation) Regulations 2007

### **Protected characteristics**

The Equality Act 2010 introduces the notion of 'protected characteristics' which it will monitor to ensure fairness. These are the grounds upon which discrimination is unlawful. The

characteristics are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

## **Equality Diversity and Inclusion Definitions**

**Equal Opportunities** is often described as 'everyone being the same'. This is somewhat outdated and today when we talk about equality we describe it in terms of everyone being different but treated with an equal level of respect and having equal access to services, training, employment, statutory rights etc.

**Diversity** is about valuing and embracing the differences in people, whether that relates to gender, race, disability, cultural background, traditional values or beliefs, age or a host of other individual characteristics which may or may not be covered by legislation. Diversity can be said to describe the range of visible and non-visible differences that exist between people.

**Inclusion** is about positively striving to meet the needs of different people and taking deliberate action to create environments where everyone feels respected and able to achieve their full potential.

**Discrimination Definitions** The following definitions have been sourced via current employment legislation and advisory bodies such as the Equality and Human Rights Commission (EHRC) and Advisory, Arbitration and Conciliation Service (ACAS).

**Direct discrimination:** This is when someone is treated less favourably than another because of a protected characteristic they have or are thought to have, or because they associate with someone who has a protected characteristic.

**Indirect discrimination:** This is when a condition, criteria, rule or even a practice in the workplace applies to everyone, but particularly disadvantages people who share a protected characteristic.

**Dual discrimination:** is when someone is treated worse than other people because of a combination of two things:

- If they are a woman or a man
- If they are transsexual
- If they have a disability
- If they are lesbian, gay, bisexual or heterosexual
- their age
- their religion
- their belief

## Policy aims

We believe our responsibility for equality is wider than those areas currently covered by present legislation. We are committed to achieving equality for all by removing direct and indirect discrimination on the grounds of:

- Age
- Race, colour, nationality, national or ethnic origin, being a traveller/gypsy
- Disability, including deaf people, blind people, people with a learning disability, people with a mental illness, and people living with HIV and AIDS
- Religious belief or non-belief, or other beliefs.
- Marital status, family circumstances, or caring responsibilities
- Sexual orientation
- Income, employment status or housing circumstances
- Social acceptance of for example substance user or alcoholic
- Membership or non-membership of trade unions or involvement or non-involvement intrade union activity
- Any other ground that cannot be shown to be justified

## We will

- Make equality a mainstream part of our day-to-day business ensuring all policies, procedures, strategies, and plans reflect and incorporate equality objectives and targets
- Ensure all learner/students can achieve their full potential, gaining qualifications and progressing to a positive outcome on completion
- Senior Management will adopt a lead by example culture with all staff, learner/student, school mentors, employers, and all partners of MTL
- Ensure that all staff (both paid and volunteers) understand their legal and moral obligations to treat all equal regardless of sex, gender, ethnic origin, religion, sexual orientation, age, disability, mental health, marital status, previous criminal convictions, social acceptance, alcohol, or drug misuse, area of residence
- Develop best practice in relation to the recruitment of staff and learner/students from under- represented groups, targeting advertising to reach under-represented groups
- Promoting employment opportunities at events in local under-represented communities
- Develop best practice in relation to the recruitment of staff and learner/students
- Review recruitment procedures to ensure they remain fit for purpose in ensuring wherever possible under-represented groups can join MTL
- Encouraging our employer base to follow our lead of “family friendly” flexible working patterns
- Ensure that all staff understand their responsibility to work to the standards and

procedures set out within MTL quality assurance system

- Ensure that all staff understand their obligations to report any issues or concerns they may have or may have been brought to their attention regarding Equality Diversity and Inclusion
- Ensure that Debbie Carney Director responsible for Equality Diversity and Inclusion issues and in her absence Amanda Clarke Quality Manger are both fully aware of their role and responsibilities regarding Equality Diversity and Inclusion
- Ensure Debbie Carney and Amanda Clarke are given adequate training to be able to conduct their duties within the role
- Provide opportunities for all staff to develop their skills and knowledge particularly in relation to Equality Diversity and Inclusion issues
- Ensure that children, young people, and vulnerable adults are enabled to express their ideas and views on a wide range of issues and will have access to the organisations Complaints Procedure
- Ensure that parents/carers are encouraged to be involved in the work of MTL and, when requested, have access to all guidelines and procedures
- Develop effective links with the appropriate agencies, especially in under-represented areas of the city
- Keep written records of any Equality Diversity and Inclusion issues raised
- Ensure all records are kept in a locked cabinet, separate from the learner/student personal file
- Endeavour to keep up to date with developments relating to Equality Diversity and Inclusion

## **Employees**

The following section clearly sets out how through recruitment, training and development of our staff we will as a company accomplish the targets, we have set within our Equality Diversity and Inclusion strategic plan

### **Recruitment and Training of Staff**

Wherever possible all vacancies will be advertised simultaneously internally and externally. Steps will be taken to ensure knowledge of vacancies reaches under-represented groups. All vacancy advertisement will include an appropriate short statement on Equality Diversity and Inclusion.

Job descriptions and person specifications will be kept under constant review ensuring they are justifiable on non-discriminatory grounds as being essential for the effective performance of the job.

At least two people will be involved in the selection interview and recruitment process, and all will have had Equality Diversity and Inclusion training, one who must have attended 'safer recruitment training'

Wherever possible a cross section of people will be involved in the process. Reasons for the selection and rejection of applicants for vacancies will be recorded, as will equal opportunities monitoring data.

Access to training is made available to all employees. Training of staff enables MTL to develop its workforce whilst achieving equality of opportunity by providing training for any member or staff who needs or will benefit from it.

A staff appraisal system is in place to identify on a regular basis any staff training requirements. All staff participate in annual mandatory training and development in Safeguarding and Child Protection, Equality Diversity and Inclusion and Health Safety and Welfare.

### **Pay and Benefits**

All employees doing equal jobs, regardless of gender, colour, race disability, and marital status, sexual orientation or offender background are treated equally with respect to pay and other conditions of their contracts of employment.

All pay increases are made on an equitable basis and the same rules apply in all cases. All benefits, facilities and services including those covered by law (e.g. maternity rights) are reviewed on a regular basis to see if they may be improved.

### **Single Central Register**

All staff who are either employed, work on a voluntary basis or are to be offered employment with MTL will be recruited into Mode in line with MTL safer recruitment policy and listed on MTL SCR.

No staff member will commence employment until the check has been completed. Procedure followed as per MTL Safer Recruitment and Safeguarding Policy and Procedures.

Debbie Carney – Director has the ultimate responsibility to ensure that a clear DBS check alone is not sufficient evidence to offer employment. Recruitment procedures should be strictly adhered to, this will ensure every possible step has been taken to eliminate employment of individuals who are not suitable to work with children, young people, and vulnerable adults.

Employers who MTL contract with for placement and or employment purposes are given a copy of this policy and are advised it is their responsibility to ensure staff they employ are safe to work with young people and vulnerable adults and have an awareness of Equality Diversity and Inclusion.

### **The role of MTL Employees**

As part of Mode Training's 3-year development plan staff training is instrumental to the continuous improvement of the company. All staff are given training annually in the following areas as a minimum: Equality Diversity and Inclusion, Health and Safety, Safeguarding/Child Protection and Occupational Competence.

All staff should be aware that any form of discrimination against members of staff or colleagues may result in formal proceedings against them at an employment tribunal. In such cases the head of department or line manager would be required to attend the tribunal and could, if the case was proven, be deemed to be **vicariously liable** for any such discrimination.

### **Dealing with discrimination**

It is the general expectation that all members of staff, including others who may be working on behalf of MTL, will behave in an acceptable manner - treating others with courtesy, respect and consideration - and conducting themselves professionally when interacting with members of MTL wider community.

Unacceptable behaviour including bullying, harassment and victimisation or discrimination - including but not limited to the protected characteristics covered by the Equality Act 2010 - will not be tolerated and any allegations will be taken seriously and dealt with appropriately under the relevant procedure.

### **Role of Equality Diversity and Inclusion Designated Person**

Debbie Carney Director is the Designated Person responsible for Equality Diversity and Inclusion; In her absence Amanda Clarke Quality Manager, their responsibilities include;

- Promote a lead by example culture with staff, learner/student, schools, and employer base
- To attend all external training sessions in relation to Equality Diversity and Inclusion
- Liaise with external agencies e.g. GERI project to ensure knowledge is relevant and current
- In conjunction with Amanda Clarke – Quality Manager, Debbie Carney will review and amend the policy ensuring it remains fit for purpose and up to date. Communicate

- the policy with all staff, learner/student, employers and MTL partners
- Familiarise herself with legislation, ensuring the policy is legally compliant
  - Give staff the advice and support required to improve their confidence when dealing with Equality Diversity and Inclusion issues and concerns
  - Ensure all staff receive basic training in Equality Diversity and Inclusion issues and are aware of MTL policy and procedures
  - Maintain statistics from Equality Diversity and Inclusion data, starts, achievers, leavers etc. Benchmark against local, regional, and national data, share data with staff at quarterly meetings
  - Write and implement Equality Diversity and Inclusion strategy and action plan
  - Maintain records of complaints or concerns, sharing the information on a “need to know” basis with staff – ensure action plans are implemented when required because of complaints or concerns. Monitor and evaluate action plans
  - Ensure the records are shared with Amanda Clarke and locked away separate from learner/student personal files
  - Liaise with Amanda Clarke in relation to Equality Diversity and Inclusion issues and concerns raised

Overall implementation of the policy rests with the Debbie Carney Company Director. A copy of the policy is on display in the training centre and issued to all staff, learner/student, employers and partners of Mode Training, a copy may also be found on our website. It is the responsibility of all employees, learner/student and work placement providers to ensure that the policy is upheld. MTL also has an Equality Diversity and Inclusion Awareness workbook which every employee and learner/student is issued with.

### **Learner/student**

The only criteria for the selection of learner/student into MTL is whether it is possible or not for the young person to complete the Individual Learning Plan. It is not acceptable to reject a young person on the grounds of sex, race, and ethnic origin, religion, sexual orientation, disability, or ex-offender status.

All learner/student applications should be dealt with consistently, staff involved in the recruitment, selection and training process should all have had Equality Diversity and Inclusion training.

All potential learner/student will complete an application form, which includes an equal opportunities monitoring section, notes are also made on the reasons for acceptance or rejection.

Once in training with MTL all learner/student will be treated equally and fairly.

- Equality Diversity and Inclusion will be included in all learner/student inductions and discussed at review with the learner/student
- All staff involved directly with learner/student will be given an induction in Equality Diversity and Inclusion Awareness and kept-up-to date with the relevant laws and current issues.
- Any alleged incident of a learner/student being bullied, harassed, or discriminated against by a member of MTL staff will be fully investigated by Debbie Carney or by a named person nominated to investigate on her behalf. Disciplinary action may then be taken depending on the outcome of the investigation.
- Monitoring will take place randomly by means of reviews and questionnaires ensuring that all learner/student have equal access to training facilities.

### **Work Placement Providers/Employers**

All staff responsible for co-ordinating or visiting employers will have received Equality Diversity and Inclusion Awareness Training and be conversant with the procedures to follow if a learner/student feels they have been discriminated against in any way, whether by the means of direct or indirect discrimination

Learner/student will be sent for interview with placement providers/employers regardless of their sex, race, ethnic origin, religion, and sexual orientation disability or ex-offender status.

All members of staff have a responsibility to the learner/student, to ensure that all alleged incidents are reported, and the necessary action taken.

All placements and employers will be given a copy of MTL Equality Diversity and Inclusion

Policy which will be explained to them prior to the commencement of a placement.

Employers will be questioned regarding Equality Diversity and Inclusion during the review process; a telephone survey also takes place twice a year with a random selection of employers.

### **Grievance Procedure/Reporting Procedure**

#### **Employee**

If any employee feels that they have been bullied, harassed or discriminated against contrary to MTL Limited Equality Diversity and Inclusion Policy they are encouraged to activate the grievance procedure as explained to them on their induction and written within

the company procedures manual.

Any alleged incidents of bullying, harassment or discrimination should immediately be reported in writing to the employee's immediate superior with a copy of the letter in all cases being sent to Debbie Carney Director

Debbie Carney will nominate a Senior Manager to fully investigate the incident, if the incident is involving a Senior Manager, she will investigate herself. Once the case of alleged bullying, harassment or discrimination has been fully investigated a written report will be forwarded to Debbie Carney and Peninsula who will support in the decision.

Should bullying, harassment or discrimination be identified the employee will be invited to a formal hearing, provided with a copy of the report, and informed of their legal rights. A colleague of their choice or trade union representative may accompany them.

A written record of the meeting will be made, and any action taken will be formally recorded in writing, a copy of which will be sent to Debbie Carney Director and the employee.

### **Learner/student**

If any learner/student feels they have been bullied, harassed, or discriminated against contrary to MTL Equality Diversity and Inclusion policy they should follow the grievance procedures as set out in the induction manual. This procedure will have been clearly explained to them at induction and a checklist signed to say they have read and understood it.

Any member of staff or learner/student who has any reservations regarding their implementation of the said policy should raise their concerns with their direct superior.

## Annex 1

### Disability Statement

It is important you are aware we have many ways of supporting you to be successful in your chosen course. We look forward to working with you ensuring you have everything you need to achieve your chosen goals and hope you thoroughly enjoy your time with us here at Mode Training.

As a training organisation we are committed to equality and diversity and social inclusion for all our staff and students. This means we want to remove any barriers to learning which may be worrying you. If you feel you have a concern about starting or completing your chosen programme or qualification, then we would like you to tell us.

We will discuss your concerns and look at how we can help you to overcome any disability, learning difficulty or additional learning need. We want you to achieve your personal, employment, training, and educational aims.

Our training facilities at The Secret Warehouse have disabled access with ramps, and have adaptations to support your learning.

We still have more things we can do, and we are planning new improvements to help you further. The most important thing to remember is that all our staff are ready to give advice and support at any time; we all look forward to working with you.

  
Debbie Carney  
Company Director

### Do you need more advice now?

Below are the contact details you should use:

Contact: Debbie Carney  
Telephone: 0151 709 4640  
e-mail: [debbie@modetraining.co.uk](mailto:debbie@modetraining.co.uk)

In their absence:  
Contact: Amanda Clarke, Debbie Carney  
Telephone: 0151 709 4640  
e-mail: [amanda@modetraining.co.uk](mailto:amanda@modetraining.co.uk)

## How to join us - the admissions/enrolment process

This section details the admission and enrolment details for our courses, programmes and qualifications. If you have a disability and/or learning need then when you contact us, we will invite you to the training Centre to discuss your needs with our learning support advisors. We have qualified support staff who understand the following range of needs:

- Mobility
- Manual Dexterity
- Physical Co-ordination
- Ability to lift, carry or otherwise move everyday objects
- Speech, hearing or eyesight.
- Memory or ability to concentrate, learn or understand
- Perception of the risk of physical danger

We also have trained staff who understand concerns such as:

- Dyslexia
- Dyspraxia
- Dyscalculia
- Attention Deficit Hyperactivity Disorder (ADHD)
- Other autistic spectrum conditions
- Concerns with basic skills – literacy/numeracy
- Challenging behaviour

You may have a concern which is not listed above, please tell us and we will do all we can to support you through your learning journey.

At this interview your additional support needs will be assessed, and we will then make a plan to give you support or to refer you to a place where your support requirements may be appropriately met.

You will need to complete an application form. If you have problems with writing, spelling, or communicating in writing, please let the advisor know and we will help you to make an application which does not involve writing or involves little writing. You may be able to use a computer and we have writers at the training Centre to further advise you.

If you live or work locally and you cannot travel to us easily, then we may be able to come and see you at home or at work. This is not always possible, but we will do our best to help you. Let us know if you would like to be considered for this service.

If you would like to bring a friend, relation, parent, or partner to the admission meeting then please do so. We like to meet the people who are helping and supporting you now.

If you are in receipt of an Educational Health Care Plan (EHCP) or are in the process of having a plan agreed with the local authority an appointment will be made with Emma Sinnett and Debbie Carney to discuss in detail with your parents/guardian/carers the extent of your support needs and how we can ensure the relevant support is in place prior to starting at Mode. Your individual support plan will be drawn up and agreed by all parties, this document will be reviewed on a weekly basis with your tutor/assessor.

**We have links with:**

- Disability Rights Commission
- Royal National Institute for Deaf
- Henshaw's Society for Blind
- YPAS
- Career Connect
- Liverpool Autistic Society
- Dyslexic Foundation
- GMLPF LLDD Forum

Once we have met you and assessed your needs then we will be able to explain the level of support we can give you so that you are successful in your aim.

Prior to commencing your programme, we will also need to carry out an initial assessment of your basic skills and functional skills ability.

**Basic skills**

We will explain the Basic Skills Assessment to you. The Assessment is designed to show us how much support you will need with literacy and numeracy. We will advise you after the Assessment, in private, if you do need some extra help in either or both of these areas.

If you feel that because of your current level of qualification the assessment would be unnecessary for you then please tell us and we will look at the certificates showing your levels and grades of existing achievement and make a decision with you about how appropriate the assessment is for you.

**Functional Skills/GCSE**

The three main functional skills/GCSE's you may be working towards include:

- English
- Mathematics
- Information and Communication Technology (ICT)

Depending on the level and type of programme you are following will determine the level of functional skills/GCSE you are required to complete.

You will be told the results in private, and we will discuss your training needs with you. We will record these on a form called an individual learning plan.

### **Learning facilities and support**

We have the following equipment and facilities available for use. Staff will always give you full training on how to use any of the equipment below safely:

- Digital recorders
- Voice activated software
- Claro reader
- Scanners
- Large print copiers
- Laptop computers
- Internet access
- Adjustable chairs
- Hearing loop
- Coloured overlays
- Hearing loop

### **We have the following support staff available:**

- Readers
- Writers
- Attendance and Learning Mentor
- Equality and Diversity Officer
- Student representative

Other specialist equipment can be obtained at short notice; we operate a lending service jointly with other local training providers through provider network.

## **Other specialist support**

We do not have a doctor/nurse on site, but we do have qualified First Aiders and Mental Health First Aiders.

Their names are also shown on notices around the training centre and are also in your induction pack. You will also find on these notices the location of your nearest accident book, first aid kit and fire evacuation plan.

## **NVQ assessment, GCSE/Functional skills, controlled assessments, and examination arrangements**

We realise that when you start on a course, programme or Apprenticeship, you will have concerns about what you are required to do to achieve your aims, in some cases you may be allowed longer during your exams. It is very important that you do tell us about your disability or concerns over learning difficulties so that we can advise you which courses would be impractical for you because of the rules set by academic standards.

We may be able to gain written permission to have academic standards varied or adjusted, so that signers, readers, writers or specialised equipment can be used in the examination room. If you tell us your concerns we will do everything we can to help you within the rules and regulations of the awarding body/examining board

## **Evacuation Procedures**

Evacuation procedures are covered in your induction and displayed around the training centre, regardless of any difficulties you will be evacuated along with everyone else. All staff are trained to ensure all students and/ or visitors to the centre are evacuated safely.

## **Our Complaints and appeals procedure**

Our complaints and grievance procedure will be fully explained to you during your induction and covers all areas including:

- NVQ assessment appeals procedure
- Complaint or grievance regarding the service you are being given at Mode
- Bullying or Harassment incidents
- Grievance with your employer (if you have one)
- How to obtain support from a mentor or friend during a grievance interview
- How to complain regarding a breach of your rights as a disabled person

It is our duty to support you during a complaint whilst you are at work but still on a publicly funded learning programme and will support you throughout the process.

**Planned Improvements**

- Wheelchair accessible height adjustable desks

**Review of policy and procedures**

This policy will be reviewed by Debbie Carney Director in conjunction with Amanda Clarke on an annual basis. Information from recruitment data, start data, achievement data, staff meetings, case conference notes, cause for concern logs and learner/student/employer questionnaires will all be used to ensure the policy is reviewed in an open and transparent manner. The updated version of the policy will be displayed in MTL reception; a copy will be held in the company quality assurance system, a copy will be distributed to all relevant parties and posted on our website.

This policy was produced by Debbie Carney and Amanda Clarke on behalf of MTL.

**Signatures**

This policy was written by Amanda Clarke, in conjunction with Debbie Carney , Company Director and will be reviewed on an annual basis.

Signed:  
Dated:

**Debbie Carney**  
**Company Director**

Signed:  
Dated:

**Amanda Clarke**  
**Quality Manager**

**Policy Review**

Date of review	Review completed by	Overview of any updates
03/02/2019	Debbie Carney	No changes required
04/03/2020	Debbie Carney (Carney)	No changes required. Policy remains fit for purpose.

30/03/2021	Amanda Clarke	Policy changes made: <ul style="list-style-type: none"> <li>• Removal of school provision throughout policy</li> <li>• Updates from CBS to DBS</li> <li>• Changes made to layout</li> </ul>
23/03/2022	Debbie Carney	Policy Remains Fit for purpose
29/03/2023	Debbie Carney	Policy Remains Fit for purpose
24/01/2024	Debbie Carney	Policy Remains Fit for purpose – date of review amended to bring in line with other policies

## Policy Communication and Consultation

Where possible, this policy has been written in conjunction with staff, learners and employers feedback.

Staff should sign below once you have read and understood the policy. You should provide any feedback immediately to the producer of the policy, if you feel any changes should be considered. This can be done by internal e-mail.

Name	Date	I have read and understood this policy Y/N	Signature
Les Calvert			
Debbie Carney			
Amanda Clarke			
Mike Chatterton			
Louisa Fay			
Michael Flood			
Kelly Coughlin			
Alan Robinson			
Emma Sinnett			
Wesley Tagoe			
Summer Waters			
Zara Worswick			