

Equality, Diversity and Inclusion Policy

June 2026

Version Control

Review of policy - The Equality, Diversity and Inclusion Policy will be reviewed annually by the Head of Learner Services and the QA People Team.

Access - The policy will be published on the QA Intranet, and Learner and Employer Portals.

Next Review Date: June 2027

Revision History			
Version	Issue Date	Author	Description of Change
1.0	April 2018	Paul Masterman	New Policy
1.1	May 2019	Gerwyn House	Review and update
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1.5	July 2024	Mark Soady	Review and update of template
1.6	June 2025	Mark Soady	Review and update
1.7	June 2026	Alan Skelton	Updated to reflect legal duty to take reasonable steps to prevent sexual harassment in the workplace and establishment of new complaints process

Document Approval		
Name	Position	Viewed / Comments
Naomi Lavender	Quality Director	04/08/22 approved
Brett Cuming	Head of Quality	19/07/23 approved
Naomi Lavender	Quality Director	10/07/24 approved
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1. Statement

QA Apprenticeships (QAA) is committed to providing equal opportunities for all staff and apprentices and eliminating discrimination.

In addition, we are committed to taking positive action to identify and eliminate inequality and promote inclusiveness.

All staff, apprentices, subcontractors and employers are expected to work together to create an environment where everyone feels safe, respected, and listened to, regardless of their background.

We recognise that some groups in our society experience discrimination. We are therefore committed to challenging all forms of discrimination and ensuring that the promotion of equality and diversity underpins everything we do.

We will seek to redress all forms of disadvantage.

We will safeguard the interests of all the protected equality characteristics as outlined in the Equality Act 2010: disability, sex, gender reassignment, age, race, religion or belief, pregnancy and maternity, marriage and civil partnership, and sexual orientation.

We will eliminate unlawful discrimination, harassment, or victimisation on the grounds of the protected characteristics, as well as unfair discrimination by perception or association.

We recognise that discrimination may occur for other characteristics, such as socioeconomic status, which are not explicitly protected by the Equality Act 2010.

We will promote good practice in equality and diversity, and will ensure that all staff, apprentices' subcontractors, and employers we work with operate within the context of this policy.

QA Directors and staff have a duty to implement procedures for furthering equality of opportunity and to ensure these are always employed. This is laid out in both staff and learner recruitment documents.

QA will uphold the 2015 SEND Code of Practice 0-25 years to use "Best Endeavors" to meet the needs of learners who have 139a (transition plans) and Education, Health, and Care Plans (EHCP).



2. Purpose of the Policy

The purpose of this policy is to establish clear guidance regarding equality and diversity and to establish key principles, structures, and monitoring arrangements for Apprenticeships.

QA recognises its legal obligations under the following legislation:

- The Equality Act 2010
- Human Rights Act 1998
- Apprenticeships, Skills, Children and Learning Act 2009
- Special Educational Needs and Disability Act 2001
- The 2015 SEND Code of Practice 0-25 years.

3. Policy Objectives

- To eliminate unfair discrimination
- To advance equality of opportunity
- To foster good relations for all including those with protected equality characteristics
- To promote and facilitate Apprentice success and narrow any gaps in Apprentice achievement
- To encourage the development and sharing of good practice in the promotion of equality and diversity

4. Governance

The QAA Leadership team will meet quarterly to review Equality and Diversity for apprentices and applicants.

QA will report annually on apprentice achievement by protected characteristics and set stretching targets for inclusion.

5. British Values

Within the UK we have a set of British Values that define who we are as a nation; these include the rights and freedoms that we openly accept. These are often misunderstood as behaviours that all must conform to, when in fact these simply comprise the way, we would expect to be treated in our daily lives. We are happy to promote and share these values in our teaching and always conduct. There are four specific values, which are:

- **Democracy** – You have the right to live in a society where you can vote and have a say on how things are done.
- **Rule of Law** – You have the right to live in a law-abiding society, where the law protects its citizens. You are innocent until proven guilty.
- **Mutual respect for and tolerance of those with different faiths and beliefs and for those without faith** – You have the right to be respected and tolerated regardless of your background, culture, gender, age, sexuality, religion, or belief.
- **Individual liberty** – You have the right to live and speak freely.

6. Equality & Diversity Principles

We will:

- Create a positive, inclusive environment with a shared commitment to respecting diversity and difference.
- Value the achievements of all apprentices and support them to realise their full potential.
- Ensure that equality and diversity issues are considered within business planning processes.
- Encourage all apprentices to have high expectations and high aspirations for their future progression.
- Promote positive images of apprentices and staff to celebrate success from all backgrounds.
- Develop a curriculum offer that meets the needs of the whole community and supports under-represented groups.
- Collect, analyse and report on a range of data that will identify areas of inequality, and develop appropriate strategies and actions that will address those inequalities.
- Make reasonable adjustments to ensure that apprentices and staff are supported to fully participate and achieve their potential.
- Encourage applications from potential apprentices and potential employees into non-traditional areas of work or study to address areas of under-representation.

7. Promoting Equality and Diversity and Inclusion

QA will promote the disability-confident ethos and inclusivity values with apprentices and employers, through effective and engaging inclusive marketing campaigns, relevant topical weeks, advice, and guidance in QA guides, and through staff engagement.



QA will promote equality of opportunity, positive attitudes, and good relations between all members of the business community.

All staff and apprentices are responsible for the promotion of equality.

QA takes positive action to narrow gaps in achievement and addresses under-representation of groups in the provision of employment, education, and training. It monitors data on race, gender, age, and disability among apprentices.

There is an action plan to re-address any gaps revealed in this monitoring process, which is reviewed regularly by the Senior Leadership team.

In training, QA staff will promote British values, including equality and inclusion-related values. Any view expressed contrary to these values will be addressed in the classroom and any extreme views will be shared with the safeguarding team.

QA Skills Coaches and Digital Learning Consultants will discuss and promote British values, including equality and inclusion-related values at every meeting.

The business will comply with the 2015 SEND Code of Practice 0-25 years in fully supporting assessments and examinations for disabled candidates, including accessible information on their qualifications, initial assessment of support needs and correct application of awarding body standards for assessment and examinations.

QA will take all steps to recognise a learner by the gender they identify with. QA has a duty to declare apprentices' legal sex when registering the apprentice with the ESFA for funding. This does not mean that QA cannot recognise the apprentice as the gender they identify with. QA will gather both sex and gender details from apprentices to ensure that:

1. all apprentices are recognised as the gender with which they identify
2. all apprentices, regardless of sex or gender, are achieving positive outcomes at the same rate.

8. Staff Development

QA provides all staff with training in equality and diversity. This includes initial training in induction and further sessions at different levels to promote awareness, including new requirements such as meeting the needs of apprentices with Special Educational Needs and Disabilities, Safeguarding, and the Government's Counter Terrorism Strategy (Prevent).

Training is identified and designed to enable all staff to carry out their role in promoting equality, whilst fostering good relations between different groups and eliminating discrimination.

9. Disclosures

Apprentices are invited to disclose any disabilities, learning difficulties or other needs



relating to protected characteristics that they may have. The opportunity to do so is presented via application and/or at initial sign-up and again on programme during one-to-one discussions with their usual member of staff, to whom they are aligned.

If, for any reason, an apprentice fails to disclose any disabilities, learning difficulties or other needs relating to protected characteristics, at the earliest opportunity QA will update the apprentice's ILR and provide relevant support and adjustments once QA has been notified of these disclosures.

QA will promote an environment in which people feel confident to disclose through inclusive marketing materials, advice, and guidance available online.

10. Feedback

Through the promotion of British values and the enrichment of the apprenticeship journey, QA will invite feedback from apprentices on their experience and perceptions of QA.

Targeted apprentice engagement will be achieved through annual feedback sessions and focus groups will be utilised to gain perceptions of the business environment, recruitment process, and the quality of their experience.

Insights gained from apprentice engagement will be fed back to the Senior Leadership Team and incorporated into business planning, equality and diversity action plans and local planning. Where sessions have not been available, QA will revert to NPS feedback in place of face-to-face sessions.

11. Equality & Diversity in Practice

All staff will conform to and promote ethos and policies related to Equality, Diversity, and Inclusion.

As key stakeholders in the business, learners have a responsibility to comply with all relevant policies, treating fellow learners and staff with dignity and respect. Learners are made aware of the relevant policies at induction, during classroom and Skills Coach discussions and through various methods including themed weeks, training and guidance materials and messaging.

QA will record equality and diversity incidents and complaints, and all staff will take responsibility for challenging and recording discriminatory behaviors, harassment and victimisation relating to protected equality characteristics.

Since 2024, UK employers have had a positive legal duty to take reasonable steps to prevent sexual harassment in the workplace.

The following QA Policies will be considered in conjunction with the implementation of the Equality and Diversity policy:

1. Safeguarding Policy and Procedure,
2. The complaints process should be used to record, investigate, and report upon outcomes of complaints or incidents related to equality and inclusion.
3. Code of Conduct (Learner)
4. QA Equal Opportunities Policy
5. Disciplinary Policy

Any instance of unfair discrimination, harassment and victimisation will be dealt with under the relevant business policies and procedures.

12. Equal Opportunities Definitions

12.1. Direct Discrimination

Direct discrimination takes place when a person is treated less favourably than another (in the same circumstances) on grounds such as but not limited to race, colour, national or ethnic origin, sex, marital status, sexual orientation, disability, class, age, or religious belief.

12.2. Indirect Discrimination

Indirect discrimination means applying a condition or requirement which adversely affects one group more than another and cannot be strictly justified in terms of the requirements for performing the job.

12.3. Racial Discrimination

Discrimination on the grounds of colour, race, nationality (including citizenship), ethnic or national origins. The policy is directed towards the effects of racial discrimination in employment, as set down in the Race Relations Act 1976.

12.4. Sex Discrimination

Discrimination on the grounds of a person's sex or marital status. QA is committed to countering discrimination against women in all its forms including the recognition that employment practices should acknowledge the demands of childcare and the care of other dependents.

12.5. Discrimination on the Grounds of Sexual Orientation

Discrimination based on sexual orientation, meaning a person's sexual orientation towards persons of the same sex, persons of the opposite sex, or persons of either sex; or in relation to the protected characteristic of sexual orientation. We remain committed to acknowledging different sexualities and supporting job applicants and employees to be open about their sexual orientation.



12.6. Discrimination on the Grounds of Religion

Where the employees have cultural or religious needs which may conflict with existing work requirements. QA will consider whether it is reasonably practicable to vary or adopt these requirements to enable any such need to be met.

Although the Race Relations Act does not specifically cover religious discrimination, such requirements would be unlawful if they had a disproportionate adverse effect on racial groups and cannot be shown to be justifiable.

13. Application of the Policy

Unacceptable attitudes and behaviour will be dealt with decisively and according to agreed procedures.

Harassment of a group or individuals will lead to the disciplinary code being implemented.

Harassment includes physical assault or abuse, verbal threats or abuse, unwelcome physical contact, name calling, insults, ridiculing, demeaning jokes, following, comments on personal appearance or dress, graffiti against groups or individuals, removing posters, and displaying or distributing materials offensive to other groups.

14. Grievance and Appeals Procedures

Apprentices are advised to follow QA's Apprenticeships complaints process where they feel they have received unfair or unequal treatment or experienced harassment.

Apprentices can raise these issues by completing a complaints form and emailing this to qaacomplaints@qa.com.

For employees of QA who feel that they have received unfair or unequal treatment, or have experienced harassment, they should email people.team@qa.com.

QA will monitor, annually review, and evaluate the implementation and effectiveness of this policy.



