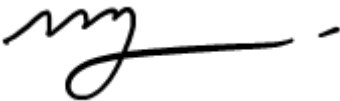


Equality, Diversity and Inclusion Policy

2025-2026

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Date last reviewed:	31/07/25
Effective from:	01/08/25
Date of new review:	31/07/26

Promotion of Diversity in Apprentify Group and its subsidiaries

Background

Apprentify Group and its subsidiaries are committed to equality of opportunity for all current and former staff, learners, associates, job applicants, visitors, clients, customers, and suppliers. We use the Equality Act 2010 as the legal basis for this policy.

Our aim is to create a working environment where:

- All decisions are based on merit.
- Individuals can make best use of their skills, free from discrimination against the nine legally 'protected characteristics'; age, disability, sex, sexual orientation, gender reassignment, marital or civil partner status, pregnancy or maternity, race, and religion or belief.

We do not discriminate against anyone in any circumstances or situation. Nor do we allow our staff or learners to discriminate, or to be discriminated against.

Despite that strong commitment, our policy does not bind us to the needs of any specific group. We do whatever we can to accommodate the requirements of different religions, cultures, and domestic responsibilities. For example, we recognise the importance of respecting the religious, racial and gender-specific clothing requirements of individuals, and the needs of staff with disabilities.

The policy's scope and purpose

This policy applies to all aspects of our relationship with staff, learners and to relations between staff members and learners at all levels. The policy is absolute; we do not discriminate against anyone in any circumstances or situation, and we do not allow our staff to discriminate, or to be discriminated against at work.

The policy covers job advertisements, recruitment and selection, training and development, opportunities for promotion, conditions of service, pay and benefits, conduct at work, disciplinary and grievance procedures, and termination of employment. It covers all employees, contractors & learners, and permeates all our policies.

This policy is linked to our Prevent Policy. Apprentify Group and its subsidiaries is committed to ensuring it meets all its statutory duties and responsibilities with regards to prevent to ensure we provide a safe and secure environment for our learners.

Equality, Diversity, and Inclusion Statement

Our organisation, Apprentify Group and its subsidiaries, is committed to the entitlement of high-quality education to all eligible learners from all backgrounds. We understand our responsibility in enabling learners to be respectful citizens both during and after their time in education, developing their understanding of and appreciation for equality and diversity.

Apprentify Group and its subsidiaries has a full equality, diversity, and inclusion policy which all staff are familiarised with and adhere to at all times.

Apprentify Group's responsibility

We will promote this policy as part of our staff induction which is revisited annually via e-learning courses. For learners this is included in their induction and embedded throughout their programme.

In compliance with the legal requirements relating to 'protected characteristics', we do not discriminate directly or indirectly against anyone. We also do whatever we can to accommodate the requirements of different religions, cultures, and domestic responsibilities.

Your responsibility

'We' means everyone. You have a duty to follow this policy and treat everyone you encounter at work with dignity and respect. You must not discriminate against or harass anyone because of a protected characteristic, or for any other reason.

Direct and indirect discrimination

Direct discrimination occurs when someone is treated less favourably than others because they have a legally protected characteristic (age, gender, race, etc.).

Indirect discrimination occurs when a requirement makes it more difficult for someone with a protected characteristic to succeed.

The policy in action

If you believe that you have been discriminated against in any way, including being harassed because of a protected characteristic, raise it through our Grievance Procedure. We treat all allegations of breaches of this policy very seriously and in total confidence. We investigate thoroughly, and with extreme care and sensitivity. If anyone makes allegations, we will ensure

they are not victimised or treated less favourably as a result. However, if we find that someone has made false allegations we will deal with it under our Disciplinary Procedure.

Any member of Apprentify Group and its subsidiaries who is found to have committed an act of discrimination or harassment will be subject to disciplinary action. Such behaviour is gross misconduct, leading to dismissal.

Recruitment and selection

Our aim is to ensure that no job applicant or learner suffers discrimination regarding any of the protected characteristics.

We review our recruitment and induction procedures regularly to ensure that we treat individuals based on their relevant merits and abilities. We review job selection criteria regularly to ensure they are relevant, and we take steps to reach a diverse labour market with our job advertisements, which avoid stereotyping, or wording that may discourage groups from applying.

We do not ask applicants about health or disability before making a job offer. Post-job offer to ask candidates to volunteer their personal medical information to ensure that we can fully support them in their job role.

Neither do we ask applicants about:

- Past or current pregnancy or future intentions related to pregnancy.
- Any matters concerning any of the protected characteristics.

The law requires us to ensure that all employees are entitled to work in the UK, and not to make assumptions about immigration status based on appearance or apparent nationality.

To satisfy immigration legislation, all prospective staff – of any nationality – must be able to produce original documents (such as a passport) before employment starts.

Training, promotion, and conditions of service

We identify training needs through our initial assessment process, regular reviews and annual appraisals, and our aim is to give all staff access to the training they need to perform well and progress within Apprentify Group and its subsidiaries.

- We make all promotion decisions based on merit.
- We review our conditions of service regularly and examine the benefits and facilities we offer to confirm that there are no unlawful obstacles preventing all relevant people from accessing them.

- All staff are required to complete an online Equality and Diversity upskill/refresher course per annum.

Termination of employment

We ensure that redundancy criteria and procedures are fair and objective and are in no way biased or discriminatory.

We also apply our disciplinary procedure and penalties fairly and equitably, treating everyone the same when it comes to warnings, dismissal, or other disciplinary action.

Disability discrimination

We monitor the physical features of our premises to make sure they don't place physically disabled workers, job applicants or visitors at a substantial disadvantage in relation to other staff. We do what we can to improve the experience for staff and others with any disability.

Fixed-term employees and associate workers

We monitor our use of fixed-term employees and associate workers, as well as their conditions of service, to ensure that we are offering appropriate access to benefits, training, promotion, and permanent employment opportunities. Where relevant, we monitor their progress to ensure they have access to permanent vacancies.

Employees with a disability

If you have, or develop, a disability, please tell us about your condition so that we can arrange to give you the right sort of support.

If you experience physical difficulties at work because of your disability, talk to your line manager about any reasonable adjustments that would help overcome or minimise the difficulty. The HR Director may then want to talk to you and your medical adviser(s) about possible adjustments.

Once we know all the facts, we will consider the matter carefully and try to accommodate your needs, within reason. If we decide that an adjustment is not reasonable, we will explain our reasons and try to find an alternative solution.

Harassment, Victimisation & Bullying

Policy

We do not tolerate harassment, victimisation or bullying in any circumstances. We regard them all as gross misconduct, so offenders are liable to dismissal.

Harassment is unwanted physical, verbal, or non-verbal conduct that intends to, or does, violate someone's dignity, or creates an intimidating, hostile, degrading or humiliating environment for them. It can be just a single incident.

Victimisation is the act of singling someone out for cruel or unjust treatment.

Bullying is seeking to harm, intimidate or coerce (someone perceived as vulnerable). It is unwanted, aggressive behaviour.

Child-on-child abuse is when children under the age of 18 sexually, physically or emotionally abuse another child. This is linked to our Safeguarding Policy.

Guidelines and procedure

What to do if you are the victim of bullying or harassment?

We take all allegations of victimisation, bullying and harassment extremely seriously. If you feel you are being targeted, follow the complaints procedure.

If the case is proved against an employee, we deal with the matter under our Disciplinary Procedure. If it is a third party, we take appropriate action.

Your right to appeal

If you are not satisfied with the outcome, you may appeal in writing to the Board of Directors within five working days of the decision stating your full grounds of appeal.

There is then an appeal meeting, normally within a week of receiving your appeal. It is dealt with impartially by someone who has not previously been involved in the case, usually a Director of Apprentify Group and its subsidiaries, although they may ask anyone previously involved to be present. As before, you have a right to bring a companion to the meeting.

We then confirm our final decision in writing, usually within a week of the appeal hearing. This is the end of the procedure and there is no further appeal.

Review

This policy will be reviewed annually or earlier if deemed necessary.