



MKC Training Services Limited
at The Royal School of Military Engineering

EQUALITY, DIVERSITY AND INCLUSION POLICY

Approved Date: January 2019
Review Date: January 2021
Version: 3

1. Introduction

- 1.1 MidKent College Training Services (MKCTS) believes firmly that Equality, Diversity and Inclusion are essential factors which contribute to the academic and economic strengths of the Company.
- 1.2 MKCTS is committed to providing a learning and working environment that promotes equality of opportunity and values all forms of diversity. It is an MKCTS expectation that all staff, trainees and visitors are treated fairly and with respect. By embracing the diversity of our local community we aim to not only meet, but also exceed our obligations under current and future equality legislation.

2. Scope of the Policy

- 2.1 This Policy relates to diversity and equality of opportunity and applies to all members of staff, trainees, visitors, contractors, service providers and any other persons associated with the functions of MKCTS. This Policy covers all sites on which the company carries out its activities including MKCTS.
- 2.2 Aspects of diversity and equality of opportunity relating specifically to Military trainees are addressed in accordance with the British Army's Values and Standards, The Defence Strategy and Social Conduct Code to Meet Public Sector Equality Duties (JSP 887), the 1 RSME Regiment Welfare and Duty of Care Directive and the Station Commander's Policy Statement.
- 2.3 The Equality, Diversity and Inclusion Policy forms an integral part of the MKC Single Equality Strategy and should be read together with this and other relevant MKCTS policies.

3. Purpose

- 3.1 The purpose of this policy is to demonstrate the MKCTS commitment to upholding and valuing the principles of diversity, inclusion, fair treatment and equality of opportunity. MKCTS unequivocally opposes discrimination in all its forms and is committed to preventing acts of exclusion and unfair treatment as defined by legislation and MKCTS policy.
- 3.2 MKCTS also recognises its legal responsibility to ensure that in carrying out its activities it will:
 - Promote equality of opportunity across all MKCTS activities
 - Promote good relations between people of a diverse background
 - Eliminate unlawful discrimination.

4 Policy Statement

- 4.1 It is the policy of MKCTS that individuals are not treated less favourably on the grounds of race (including ethnic or national origin), gender, disability, age, sexual orientation, religion or belief, gender reassignment, marital or civil partnership status, pregnancy, maternity or paternity, socio-economic status or any other factor.
- 4.2 MKCTS recognises that members of staff and trainees may have a range of aspirations and goals and wishes to provide a positive working and learning environment where diverse skills and experiences are applied across all sections of MKCTS including teaching, learning, and management.
- 4.3 MKCTS seeks to create an ethos of positive inclusion, in which issues of racism, stereotyping and discrimination can be discussed openly with a shared commitment to challenging prejudice. We aim to become an institution that empowers the disadvantaged through promoting good relations between members of all groups, and having a staff profile representative of our local community.
- 4.4 Equality, Diversity and Inclusion are integral to the day to day running of MKCTS and to the formulation of policy and strategy. An Equality, Diversity and Inclusion Policy cannot succeed without the active support of the entire MKCTS community and must be the priority and responsibility of the Senior Leadership Teams. In order to assess our progress and fulfil our public sector duties, Impact Assessments and Impact monitoring will be undertaken.

5 Definition of Terms

- 5.1 **Discrimination** is defined as an act which has the effect of treating a person less favourably because of factors related to their personal characteristics such as disability or sexual orientation, and unrelated to their merit.
- 5.2 **Diversity** encompasses all forms of difference in individuals even if they are not covered specifically by legislative acts.
- 5.3 **Harassment** is unwanted conduct which may create the effect (intentionally or unintentionally) of affecting an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment which interferes with an individual's learning or working environment. Harassment may be persistent or an isolated incident, and may be by an individual against an individual or involve groups of people.
- 5.4 **Stereotyping** is defined as a standardised mental picture that one person or group of people hold in common about another person or group of people, and can be either positive or negative.

5.5 **Positive Action** is the deliberate introduction of measures to eliminate or reduce discrimination, or its effects. It is not about special treatment for any one particular group, but the fair treatment of all people. It is distinct from positive discrimination which is unlawful.

6 **Our Commitment**

6.1 Race

6.1.1 MKCTS does not accept any form of racial discrimination or harassment against any trainee, member of staff, visitor, prospective trainee or prospective member of staff based on their actual or perceived race, colour, or ethnic or national origin.

6.1.2 All members of the MKCTS community have a duty to make sure that their working and learning environment is free from prejudice and provides a framework for promoting race awareness in line with the Race Equality Scheme set out in the MKC Single Equality Strategy. As a part of its Race Equality Duty, MKCTS monitors staff and trainee profiles with regard to race and addresses any imbalances through the implementation of the MKC Single Equality Action Plan and, where deemed necessary, use of positive action.

6.2 Disability

6.2.1 MKCTS will not discriminate against or tolerate the harassment of members of staff, trainees, job applicants, or visitors because of a disability or perceived disability. MKCTS recognises disability to include someone who has a physical or mental impairment that has a substantial and long-term adverse effect on their ability to carry out day-to-day activities, including people with physical and sensory impairment, learning difficulties, mental health problems, hidden impairments and people living with HIV/AIDS.

6.2.2 MKCTS welcomes applications from people with disabilities, values the contribution of existing staff and trainees with disabilities, and will treat staff and trainees fairly should they become disabled. MKCTS incorporates the Disability Equality Duty within the Single Equality Strategy, providing a framework for proactively monitoring and raising awareness of disability in work and study.

6.3 Gender Reassignment

6.3.1 MKCTS will not treat any staff member, job applicant, trainee, or prospective trainee less favourably because of their gender, whether they are male, female or undergoing any stage of gender reassignment. Discrimination and harassment on the grounds of gender, including sexual harassment, is not acceptable and will be dealt with in line with the MKCTS disciplinary procedures.

6.3.2 As a part of our Gender Equality Duty, MKCTS monitors staff and trainee profiles with regard to gender and addresses any imbalances through the implementation of the Single Equality Action Plan and, where deemed necessary, use of positive action.

6.4 Sexual Orientation

6.4.1 MKCTS does not accept any form of discrimination or harassment against any trainee, member of staff, job applicant or prospective trainee because of their sexual orientation or their perceived sexual orientation. MKCTS is committed to working towards an environment where all people feel able to be open about their sexuality and has begun working proactively to promote awareness and tackle negative stereotypes through the Single Equality Strategy.

6.5 Religion and Belief

6.5.1 MKCTS does not accept any form of discrimination or harassment against any staff member, job applicant, trainee, or prospective trainee because of cultural, philosophical or religious beliefs or perceived beliefs or lack thereof. Where cultural or religious needs conflict with existing working or learning requirements, MKCTS will make adjustments, where practicable, to meet those needs. This may include adaptations for prayer times, dress codes, dietary requirements or religious holidays.

6.6 Age

6.6.1 MKCTS does not accept any form of discrimination or harassment against any trainee, member of staff, job applicant or prospective trainee because of their age or perceived age.

6.6.2 MKCTS recognises that education is a life-long pursuit. Subject to formal funding arrangements and those of similar partners, MKCTS works to support trainees of all ages to achieve the qualifications they desire. MKCTS endeavours to provide appropriate support for all trainees within these boundaries.

6.6.3 MKCTS will not use age-related criteria for staff recruitment purposes, unless it is to take positive action. All staff members have equal rights to training, promotion and other aspects of career development.

6.7 Pregnancy and Maternity

6.7.1 MKCTS does not accept any form of discrimination or harassment against any staff member, job applicant, trainee, or prospective trainee because of pregnancy or maternity-related situations. MKCTS works to support all trainees to complete their training including those who are pregnant, become pregnant or have recently been pregnant. Where the needs of the trainee conflicts with existing working or learning requirements, MKCTS will make adjustments, where practicable, to meet those needs. This may include adaptations for dress code or flexible timetabling.

6.7.2 MKCTS will not discriminate against any member of staff or job applicant because of pregnancy or maternity. All staff members have equal rights to training, promotion and other aspects of career development. Further information for staff can be found in our Maternity Policy located on the HR page of SharePoint.

6.8 Marriage and Civil Partnership

6.8.1 MKCTS does not accept any form of discrimination or harassment against any staff member, job applicant or trainee, because they are single, married, or in a civil partnership.

6.9 Sex

6.9.1 MKCTS does not accept any form of discrimination or harassment against any staff member, job applicant or trainee, because of their sex.

7 **Our Standards**

7.1 Trainees

7.1.1 Trainees are admitted in accordance JSP 887 The Defence Strategy and Social Conduct Code to Meet Public Sector Equality Duties. Overseas Military and Civilian trainees are accepted in accordance with JSP 510 Procedure.

7.1.2 Military trainees are selected in accordance with ARTD guidance. Civilian trainees are admitted solely on the basis of their merits, abilities and potential, in accordance with our published criteria and MKCTS will not refuse admission to anyone applying to an appropriate course based on any other factor.

7.1.3 A rigorous system is in place which enables MKCTS to monitor regularly trainee admissions, achievement, retention and complaints through Self-Assessment Reports and at SLT Meetings.

7.1.4 All trainees have the right to be treated fairly, with dignity and respect. They are also expected to treat staff and their peers fairly and with dignity and respect. Trainees and staff are informed of their rights and responsibilities in relation to the promotion of this Policy, and our staff will challenge trainee behaviour which does not meet these standards.

7.1.5 Any allegations of discrimination will be taken seriously and will be investigated in line with disciplinary procedures. Depending on the outcome, training and/or guidance may be offered to both staff and trainees to ensure future compliance.

7.2 Curriculum

- 7.2.1 MKCTS aims to provide an inclusive teaching and learning environment through individualised support plans, and professional, interactive delivery. Our courses are designed and delivered with Equality, Diversity and Inclusion in mind, and we strive to have high quality resources, free from bias or stereotyping, which promote positive images.
- 7.2.2 We endeavour to value and nurture an increasing diversity among trainees and be able to meet a wide variety of social and cultural requirements, including trainees with caring responsibilities, religious requirements, physical or mental impairments and trainees for whom English is an additional language.

7.3 Staff

- 7.3.1 All employees, whether part-time, full-time or temporary, will be treated fairly and with respect. Selection for employment, promotion, training or any other benefit will be on the basis of aptitude and ability.
- 7.3.2 All recruitment advertisements, job descriptions and person specifications will emphasise the MKCTS Equality, Diversity and Inclusion Policy and will be drawn up in such a way as to prevent discrimination against suitably qualified or experienced applicants.
- 7.3.3 We will ensure that all staff members who are involved in shortlisting, interviewing, or other selection processes are trained in line with current equality legislation and the MKCTS Equality, Diversity and Inclusion Policy.
- 7.3.4 MKCTS supports and abides by all Equal Pay legislation and endeavours to provide a transparent reward system based on objective criteria and free from any bias.
- 7.3.5 All newly appointed staff will participate in an induction programme that reflects and reinforces our commitment to equal opportunities. As a part of the induction programme, all new members of staff are required to participate in Equality, Diversity and Inclusion training, including information covering the MKC Single Equality Strategy and the Equality, Diversity and Inclusion Policy. General and specialist Equality, Diversity and Inclusion training will be provided to staff on an on-going and regular basis.
- 7.3.6 Subject to available resources and relevance to MKCTS priorities, all staff, including part-time and hourly paid staff, will have an entitlement to undertake staff development to enhance their skills, effectiveness and opportunities.
- 7.3.7 MKCTS recognises and values staff members' different needs including childcare, eldercare and personal development. Our staff timetables will, where reasonably

feasible, be arranged in such a way as to facilitate work/life balance. Further information regarding flexible working can be found in our Flexible Working Policy.

- 7.3.8 Every employee is entitled to a working environment that promotes dignity and respect to all. All MKCTS staff have a responsibility to abide by this Policy and no form of intimidation, bullying or harassment will be tolerated. Breaches of this Policy will be regarded as misconduct and could lead to disciplinary proceedings.

8 Breach of the Policy

- 8.1 MKCTS will take seriously any instances of breach to the Equality, Diversity and Inclusion Policy by trainees, staff or visitors. Any breach will be investigated and where appropriate will be considered under the relevant disciplinary procedure for staff or trainees. With regard to any breach of the policy by visitors, MKCTS will take appropriate action in relation to the nature of the incident.

9 Confidentiality and Monitoring

- 9.1 MKCTS will ensure that any equal opportunities monitoring data on staff or trainees is used exclusively for monitoring purposes and that it is treated with confidentiality and sensitivity.
- 9.2 The information we gather through monitoring will be used to inform planning, target setting and future action. Where monitoring reveals any gaps in the MKC Single Equality Action Plan or our Equality, Diversity and Inclusion Policy, we will take prompt action through the Equal Opportunities Committee and the Single Equality Action Plan.
- 9.3. MKCTS will protect the confidentiality of any equal opportunities monitoring data on staff or trainees, and will safeguard any information disclosed voluntarily within the regulations set by the Data Protection Act 1998.

10 Implementation and Review

10.1 Senior Leadership

Each member of the Senior Leadership Team, supported by Human Resources, has the responsibility to ensure that the Equality, Diversity and Inclusion Policy and the overall promotion of inclusion are put into practice in the areas for which he or she has responsibility.

10.2 Equal Opportunities Committee

The MKC Equal Opportunities Committee is a sub-committee of the Academic Board. It is chaired by the Principal and/or The Chief Executive and includes cross-college staff including MKCTS and MKC Student representatives. It encompasses

responsibility and oversight of Equality, Diversity and Inclusion for the MKC group including MKCTS.

It exists to:

- Set college level impact measures for equal opportunities
- Monitor the implementation of the Equality, Diversity and Inclusion Policy and the Single Equality Strategy
- Monitor progress toward the Single Equality Action Plan and equality targets, and report back to the Executive Group and Governing Body
- Monitor trainee, staff and curriculum data for Equality, Diversity and Inclusion trends, taking action as appropriate
- Review this Policy at least every three years.

11 GDPR

All records associated with this policy will be retained and disposed of in accordance with the HR Retention policy.

12 Equality Impact Assessment

This policy has been Impact Assessed and generates no concerns about differential impact.

12. Policy Validity

This policy is valid for a period of two years and is due for review in January 2021.

13. Associated Documents

MKCTS Dignity at Work Policy
Stress Policy
MKCTS Grievance Policy

For and on behalf of MKCTS:

Signed: _____

Name: Ian Johnston

Dated: _____

For and on behalf of the Trade Unions:

Signed: _____

Name: _____

Dated: _____

Appendix 1

Trainee Complaints Procedure

MKCTS is committed to providing all trainees with a high quality service. We want to know if our service has not met with their expectations so that we can do something about it. Whenever possible trainees should firstly raise any issues with their instructor and tell them what has gone wrong. If the response is unsatisfactory, they can complete a Complaint or Suggestions Form (F10) available from HTS Sharepoint and return it to the Integrated Management Scheme (IMS) Management Representative, Teresa Cambell teresa.cambell@hts.army.mod.uk or Deputy Representative, Richard Ingram Richard.ingram@hts.army.mod.uk We will explain what course of action will be taken and in what time frame.

Staff Complaints Procedure

MKCTS is committed to providing a fair and supportive environment for all staff. Wherever possible, staff members are encouraged to explore informal approaches to resolve any issues they may face. However, if this is not possible or is unsuccessful, their concerns can be raised with the line manager, a Trade Union representative or the HR department who will advise on the next steps in accordance with the Grievance / Dignity at Work procedures. Acts of discrimination (direct or indirect), harassment, victimisation or abuse will, if the accusation is upheld, be treated as a serious disciplinary offence.