

# Gender Equality and Equal Opportunities Policy

## Policy Commitment Statement

TheLightBulb is committed to being an organisation which is pro-diversity and anti-discriminatory where everyone's diversity is valued and appreciated. TheLightBulb is committed to promoting equality in-line with the Public Sector Equality Duty (Equality Act 2010) and has due regard to the three aims of the general duty ie:

1. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the act
2. Advance equality of opportunity between people who share a protected characteristic and those who do not
3. Foster good relations between people who share a protected characteristic and those who do not

In line with The Equality Act we will take steps to undertake the following within our business:

1. remove or minimise disadvantages suffered by staff, apprentices and learners due to their protected characteristics
2. meet the needs of staff, apprentices and learners from protected groups where these are different from the needs of others
3. encourage staff, apprentices and learners from protected groups to participate where their participation is proportionately low

TheLightBulb has a policy of gender equality and equal opportunity for everyone, regardless of an individual's characteristics as defined by the Equality Act 2010 as "protected characteristics": age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex and sexual orientation. This policy also includes discrimination against someone because of their marriage or civil partnership status.

TheLightBulb will not tolerate any unlawful discrimination, harassment, victimisation or other conduct prohibited by the Equality Act 2010.

In addition to advance equality and achieve commitment to the policy across the organisation we will:

- Promote the policy to staff and encourage engagement, through meetings, forums, training and continued reinforcement by leading by example
- Ensure staff fully understand equality and diversity, current local issues and their responsibilities in regards to equality requirements
- Empower staff to challenge prejudice, discrimination, harassment and victimisation, whilst promoting understanding and fostering good relations
- Equip managers to promote the cultural and behavioural changes, to ensure equality and diversity is fully embedded within the organisation
- Provide an environment for our staff and learners which is free from unlawful discrimination
- Train staff at all levels to implement this policy

**Suzanne Tilling**  
**Managing Director**  
**May 2022**

<b>Responsible person</b> Suzanne Tilling Managing Director	Revision Date: 01/05/2022 Next Annual Review Due: August 2022	Rev. No. 16	Reviewer's Initials: SJT
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### Employees

It is the policy of the Company to take all reasonable steps to **employ and promote** employees on the basis of their abilities and qualifications without regard to: age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex and sexual orientation. The Company will appoint, train, develop and promote on the basis of merit and ability alone.

Employees have a duty to co-operate with the Company to ensure that this policy is effective to ensure equal opportunities and to prevent discrimination. Action under the Company's Disciplinary Procedure will be taken against any employee who is found to have committed an act of improper discrimination. Serious breaches of the equal opportunities policy will be treated as gross misconduct and could render the employee liable to summary dismissal.

Employees must not harass or intimidate other employees on the grounds of the protected characteristics listed above. Such behaviour will be treated as gross misconduct in accordance with the Company's Disciplinary Procedure.

Employees should draw the attention of their Line Manager to suspected discriminatory acts or practices. Employees must not victimise or retaliate against an employee who has made allegations or complaints of direct or indirect discrimination or provided information about such discrimination. Such behaviour will be treated as gross misconduct in accordance with the Company's Disciplinary Procedure. Employees should support colleagues who suffer such treatment and are making a complaint.

Employees have a duty to co-operate with the Company to ensure that this policy is effective to ensure equal opportunities and to prevent discrimination. Action under the Company's disciplinary procedure will be taken against any employee who is found to have committed an act of improper discrimination. Serious breaches of the equal opportunities policy will be treated as gross misconduct and could render the employee liable to summary dismissal.

### Apprentice and Learner recruitment and training

The company has a strong commitment to helping members of the community to increase their skills. To this end, the company strives to **recruit apprentices and learners** onto programmes regardless of their perceived barriers to learning. These barriers may be basic skills needs such as technology, English or maths needs caused by dyslexia, lack of formal education or due to the learner being a speaker of a language other than English or barriers in relation to their disability.

The company encourages the employers of our apprentices and learners to carry out thorough self evaluation regarding their own practices relating to equality and diversity and to work with employers who feel the need for advice and assistance with their practices. The company will assist those companies that require help with their own policies in order that they may remain competitive.

The company will encourage employers to become involved in the apprentice/learners' programmes and progress; the company will monitor progress and ensure that employers are kept informed of progress rates, in addition to inviting the employers to evaluate the learning that has taken place. Where there are trade unions representatives the company will endeavour to include them in the learner's needs and progress.

At the heart of this policy is the pre entry diagnostic screening that will be carried out with every learner prior to their being offered a place onto one of our programmes. This will ensure

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that apprentices and learners enrol to in the right provision; advisers will develop individual action plans, based on the results of the screening, with clear benchmarks for easier monitoring.

Where apprentices and learners are committed to longer periods of learning, these action plans will include long and short term goals; apprentices and learners can expect to receive regular written feedback on their progress and advice and guidance on career and learning progression opportunities.

Those apprentices and learners that require additional support will be directed to the appropriate provision. This provision could be dedicated to the needs of that priority group, or involve part-time provision taking place at work or off-site, or self-study packages available online through other organisations.

Due to disability disclosure constraints and confidentiality issues, it will be the decision of the apprentice/learner to inform their employer of their support needs.

As well as additional learning support being offered, all learning will take place in venues that are easily accessible by apprentices and learners who are in a wheelchair. Other physical disabilities, such as hearing or visual impairments' needs will be met on a case by case basis.

The success of a business depends on people, capitalising on what is unique about individuals and drawing on their different perspectives and experiences will add value to the way we do business.

### **Discrimination**

Direct discrimination takes place when an apprentice, learner, employee or employees are directly excluded or disadvantaged because of protected characteristics.

Indirect discrimination means applying unnecessary criteria which have the effect of excluding a particular group. For example an unnecessary requirement to work full time or unnecessary age limitations.

Any employee, who discriminates against, victimises, harasses or bullies another employee, apprentice, learner or client will be subject to the Company's Disciplinary Policy. In serious cases such behaviour may be deemed as gross misconduct which may lead to summary dismissal.

Any complaint of discrimination, victimisation, harassment or bullying should be dealt with through the Company's Grievance Policy. No individual will be penalised in any way for such a grievance unless it is untrue and made in bad faith. If this does happen the individual will be dealt with through the Company's Disciplinary Policy.

The Company may monitor data from time to time to ensure that no direct or indirect discrimination is taking place with regard to employment with the Company.

### **Training, Transfer and Promotion – Commitment to Policy**

The Company will take such measures as may be necessary to ensure the proper training, supervision and instruction for all line managers in order to familiarise them with the Company's policy on Gender Equality and Equal Opportunities, and in order to help them identify discriminatory acts or practices and to ensure that they promote equal opportunity within the departments for which they are responsible.

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All persons responsible for selecting new employees, employees for training, or for transfer to other jobs, will be instructed not to discriminate on the grounds of protected characteristics.

Where a promotional system is in operation, the assessment criteria will be examined to ensure that they are not discriminatory. The promotional system will be checked from time to time in order to assess how it is working in practice.

### **Terms of Employment, Benefits, Facilities and Services**

All terms of employment, benefits, facilities and service will be reviewed from time to time, in order to ensure that there is no unlawful discrimination on the grounds of protected characteristics.

### **Grievances and Complaints**

All allegations of direct or indirect discrimination including on the grounds of protected characteristics, will be dealt with seriously, confidentially and speedily.

### **Monitoring Equal Opportunity - Employees**

The Company will regularly monitor the effects of selection decisions and personnel practices and procedures in order to assess whether equal opportunity is being achieved. For example: the Company will, from time to time, analyse the:

- Composition of the workforce of each department and changes in distribution over periods of time and;
- The selection decisions for recruitment, promotion, transfer and training, and the reasons for those decisions.

The Company will, from time to time, review the selection criteria and HR procedures to ensure that they do not include requirements or conditions which constitute, or may lead to, unlawful indirect discrimination.

### **Monitoring Equal Opportunity – Apprentices and Learners**

Monitoring of recruitment, progression, success and achievements will be carried out across all apprentice and learner groups. This will be reported on in the Annual SAR. Any disparity will result in an action plan being set and clear targets communicated to all involved.

### **Access to Assessment**

The company seeks to provide equal access to assessment for all candidates (apprentices and learners), ensuring that there are no unnecessary barriers to assessment and that any special arrangements for candidates preserve the validity, reliability and integrity of the qualification. The company will follow JCQ access arrangements and reasonable adjustment guidelines and use their guide to the special consideration process to ensure candidates are not disadvantaged.



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### Revision History

Revision	Date	Reviewer(s)	Comments
1	November 2005	KJ	General review and rewording
2	February 2007	JS	Learner statement added
3	March 2008	SJT	Learner statement amended and rebranded
4	February 2009	SJT	General review and rewording
5	January 2010	SJT	Review and rebranding – Equality Act
6	October 2011	SJT	Addition of discrimination definitions and further Equality Act
7	November 2011	SJT	Monitoring of E&D amendments
8	February 2012	SJT	Rebranding and wording amendments
9	June 2016	SJT	Reviewed along with all policies
10	January 2018	SJT	Reviewed with all HR related policies
11	March 2019	SJT/LJ	Add revision history and revise statement. LJ signed statement
12	October 2019	DGS	Chair Review
13	August 2020	SJT	Annual Review
14	April 2021	SJT	Part of whole policy review cycle
15	August 2021	SJT	Annual Review
16	May 2022	SJT	Part of whole policy review cycle