 <b>INTERNATIONAL</b>	POL-IPS-012	Rev: 5.0	Valid until: 30/12/2025
	<h1>Equality and Diversity Policy</h1>		
Author or latest reviewer name	Mary Holmes	Date: 28/06/2024	
Authoriser name	Jonathan Inkpen	Date: 28/06/2026	

IPS International Ltd (IPS) is committed to being an organisation that is pro-diversity and anti-discriminatory where everyone's diversity is valued and appreciated. IPS aims to comply with the Equality Act 2010 and similar related legislation that protects people from discrimination, harassment and disadvantage in the workplace and in wider society.

This policy provides guidance to enable all who work with or for IPS to comply with the Equality Act 2010, provide equality of opportunity for all and encourage and celebrate diversity.

IPS will regularly review the strategy and implementation of its Equality and Diversity Policy. Where evidence is found of ineffectiveness or noncompliance, or shortcomings related to society expectations immediate remedial action will be taken to ensure implementation.

### Diversity

IPS will actively encourage equality and diversity for all to maximise achievement and good practice and to bring benefit to individuals and communities. IPS encourages all people it works with and those it works for, to contribute to an environment in which people feel comfortable expressing how they feel and what they need, knowing they will be treated with respect and that their contribution will be valued.

The way we work, will reflect the spirit and intentions of legislation that outlaws discrimination and promotes equality and diversity. We will make reasonable adjustments to working practices, equipment, premises and offer, where appropriate, additional support to staff, learners and other service users/providers to ensure they are able to take a full and active part in our work to the best of their capabilities.

### Equal Opportunities

IPS seeks to be an equal opportunities employer and provider of services. No job applicant, employee, learner or user of our services will receive less favourable treatment on the grounds of race, ethnic or national origin; sex; marital status or caring responsibility; sexual orientation; age; physical, sensory or learning disability; mental health; political or religious beliefs; class; employment status; unrelated criminal convictions or union activities, or during pregnancy or maternity or those within the LGBT community. This principle applies to recruitment, promotion, transfer, training, benefits, facilities, procedures and all terms and conditions of employment.


### Definitions

#### Protected characteristics

The protected characteristics contained in the Equality Act are defined below:

**Age:** A reference in the act to a person who has the protected characteristic of age is a reference to a person of a particular age group or a person who shares a particular age group. An 'age group' is a group of persons defined by reference to age, whether to a particular age or a range of ages. IPS must not discriminate against any employee because of his/her age or to the age group they belong to.

**Disability:** A person is defined as disabled under the act if they have a physical or mental impairment which has a long-term and substantial adverse effect on their ability to carry out normal day-to-day activities. Physical or mental impairment includes sensory impairments.

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**Gender reassignment:** References to transsexual people under the act covers employees who are proposing to undergo, are undergoing, or have undergone a process (or part of a process) to reassign their sex by changing physiological or other attributes of sex, i.e. gender reassignment. There is no requirement that the process of gender reassignment includes medical supervision. It is recognised that there may be differences between physical sex and gender identity.

**Marriage and civil partnership:** IPS will not discriminate against any employees because they are married or are in a civil partnership. Marriage will cover any formal union of a man and woman which is legally recognised in the UK as a marriage. A civil partnership refers to a registered civil partnership of a same sex couple under the Civil Partnership Act 2004, including those registered outside the UK. Only people who are married or in a civil partnership are protected against discrimination on this ground.

**Pregnancy, Maternity, Paternity and Adoption:** IPS will not treat anyone unfavourably because of pregnancy, a pregnancy related illness, because of a period of Maternity, Paternity, Adoption or Shared Parental Leave or because they seek to take any such leave. IPS will not discriminate against an employee because of any association with a woman who is pregnant or who has recently given birth.

**Race:** IPS will not discriminate against any employee because of their colour, nationality or ethnic or national origins.

**Religion or belief:** IPS will not discriminate against any employee because of his/her religion or philosophical belief, or because of his/her lack of religion or belief.

**Sex:** IPS will not discriminate against any employee because of their sex.


**Sexual orientation:** Employees must not be discriminated against because of their sexual orientation, whether that be towards:

- people of the same sex (i.e. the employee is a gay man or a lesbian);
- people of the opposite sex (i.e. the employee is heterosexual);
- people of both sexes (i.e. the employee is bisexual).

### **Types of discrimination**

Discrimination occurs when a person (or group) is treated less favourably than others. It can take different forms and this section describes the different types of discrimination, or 'prohibited conduct', under the act.

**Direct discrimination:** is less favourable treatment because of a protected characteristic. Direct discrimination occurs if a person has the characteristic, is perceived to have the characteristic or because they associate with someone who has a protected characteristic. Direct discrimination in relation to age can be objectively justified.

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Indirect discrimination: may occur when an apparently neutral provision, criterion or practice is applied to everyone, but which puts employees who share a protected characteristic at a particular disadvantage; and this cannot be justified as a proportionate means of achieving a legitimate aim.

Discrimination arising from disability: is where a disabled employee is treated unfavourably not because of his/her disability itself but because of something arising from, or in consequence of it, and that treatment cannot be justified as a proportionate means of achieving a legitimate aim.

Discrimination by association: is direct discrimination because of an employee's association with a person who has a protected characteristic (not including marital or civil partnership status). This applies regardless of whether the employee has the protected characteristic personally.

Discrimination by perception: is direct discrimination against an employee because they are mistakenly believed to have a protected characteristic not including marital or civil partnership status.

Harassment: is unwanted conduct relating to a protected characteristic, which has the effect of violating an employee's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that employee.

Victimisation: occurs when an employee is treated less favourably because an individual has, in good faith, done a protected act (e.g. made or supported a complaint, or raised a grievance) regarding a protected characteristic.


Reasonable adjustments: are those adjustments made to remove barriers preventing people from integrating into the workplace. The duty to provide reasonable adjustments is a positive duty to remove any barriers or provide extra support to disabled employees in the workplace and for applicants during the recruitment process. Failure to make that adjustment may amount to discrimination.

Objective Justification: is the process by which an employer may be able to objectively justify discrimination as being a proportionate means of achieving a legitimate aim. If challenged it is for the employer to justify the provision, criterion or practice so evidence should be produced to support any assertion that the discrimination is justified. Considerations should be made for justification on the merits of each individual case.

### **Aims and Objectives**

The aims and objectives of the Equality and Diversity Policy are:

- To encourage, promote and celebrate diversity in all our activities and services.
- To ensure equal access to jobs and training opportunities.
- To create an environment free from harassment, bullying and discrimination.
- Through our training, publications, interaction with employees, learners, other users of our service and other activities, we will ensure compliance and overall fairness.

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- To promote equal opportunities in other areas not currently covered by legislation.
- To maximise the use of resources in the best interests of staff, learners and other service users.
- To confront and challenge discrimination where and whenever it arises.
- To make a willingness to accept and implement this policy to be a necessary qualification for any position in the Company.
- To ensure so far as is reasonably practicable, that all premises and services are accessible to all people.
- To ensure that employment and advancement within the organisation is determined by objective criteria and personal merit.
- To create an environment that all staff feel empowered to challenge inappropriate treatment of others.
- To ensure all staff and apprentices have training and support

### Implementation

IPS recognises that policies on their own do not provide equality and we will seek to promote equality and diversity within the following framework of responsibilities.

Responsibility for implementing and developing the policy rests with the Directors and Section Managers. All who work with or for the IPS have an individual responsibility to adhere to the policy and ensure a personal involvement in its application and to co-operate actively to ensure that the equal and diverse workplace environment this policy sets out is a reality.

IPS expects individuals:

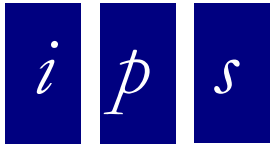
- to co-operate with measures introduced by us to ensure equality of opportunity, diversity and non-discrimination,
- not to harass, abuse or intimidate any employee, learner or any other person on any grounds,
- to be sufficiently confident to inform management if they suspect discrimination is taking place,
- IPS is committed to reviewing this policy on an annual basis. We will ensure that all those we work with and for, know our statements of policy.

IPS will work at all levels to improve the impact on learners positively in providing equality of opportunity and welcoming and achieving diversity.

### Health and Well Being

To ensure that IPS adheres to its legal obligation and social responsibilities, in relation to the health and wellbeing of its learners and staff.

IPS International is committed to improving the health and wellbeing of all learners and staff. The importance of providing a learning environment which promotes health, safety and wellbeing is enshrined in IPS values and strategic plan. We will promote opportunities for learners and staff to thrive and benefit from their learning or employment experience. Learners and staff are encouraged to disclose any health conditions/difficulties or issues to IPS, either pre or post admission, to enable IPS to make reasonable adjustments to meet their needs and enhance their learning or employment experience. The information will be treated in such a way to ensure that IPS's guidelines on confidentiality are protected and maintained.

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IPS is diverse and includes full and part time learners, in a range of work locations. IPS International is committed to improving best practice, throughout the organisation, and ensuring that the health and wellbeing of learners is embedded into the delivery of programmes, enrichment activities and general services. IPS will use a “Topic of the month” training theme to promote equality, diversity, safeguarding and physical and mental health wellbeing. This means that learners are encouraged to make wise and safe lifestyle choices where they can be physically, mentally, emotionally and sexually healthy, lead healthy lifestyles and choose not to misuse substances.

IPS has a diverse workforce and is committed to ensuring that we maintain a healthy and safe environment and support the physical and mental health and wellbeing of staff during their employment.

### **Monitoring Equal Opportunities and access for all**

IPS remains committed to providing a service to all staff and customers, to ensure that equal access to employment, learning or other services is fair and equal. Therefore monitoring of recruitment, progression, success and achievements will be carried out across all staff, 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

The responsibility for implementing and developing the policy rests with the Directors and Senior Managers to create a work environment with a culture and ethos that naturally complies with and promotes this policy.

Our “topic of the month” training theme will be used to communicate and promote this policy to IPS staff and learners. We will also use our Team meetings and wider communication systems, including both websites and social media platforms.

This policy clearly states the intention to be compliant with the Equality Act 2010 which aims to:

- eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act;
- advance equality of opportunity between people who share a protected characteristic and those who do not;
- foster good relations between people who share a protected characteristic and those who do not.

To do this IPS will take positive steps to advance equality by, removing or minimising disadvantages suffered by people due to their protected characteristics; take steps to meet the needs of people from protected groups where these are different from the needs of other people; and encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low.

IPS will further aim to:

- Tackle prejudice where it is encountered and encourage good relations by promoting understanding between people from diverse groups.
- Meet the diverse needs of disabled people including taking steps to take account of their
- disabilities and seek to remove barriers limiting access to our work activities.