

Equality and Diversity Policy

Policy Statement

Norton Webb Ltd is committed to facilitating equal opportunity and to providing a proactive and inclusive approach to equality that supports all under-represented groups, promotes an inclusive culture, and values diversity.

Norton Webb Ltd values diversity and recognises that the organisation is greatly enhanced by the different range of backgrounds, experiences, views, beliefs, and cultures represented within the Norton Webb community. This approach brings valuable insight and enhances the work we do.

We consider that equality means breaking down barriers, eliminating discrimination, and ensuring equal opportunities and access for all. We consider diversity to mean celebrating differences and valuing everyone. Each person is an individual with visible and non-visible differences; by embracing this in all of our activities, we acknowledge that variety and difference are intrinsic to the success and future development of our business. Equality and diversity are not interchangeable but interdependent: there can be no equality of opportunity if difference is not valued and harnessed.

This policy sets out Norton Webb's values-based approach to equality and diversity. It sits alongside the Equal Opportunities Policy, which addresses the operational and statutory detail (recruitment, reasonable adjustments, conduct standards, complaint routes, and monitoring).

Policy Scope

The rights and obligations set out in this policy apply equally to:

- Actual and prospective learners ('learner' is used as a common term to also denote client and customer where appropriate).
- Employees (whether part-time or full-time, on a substantive or fixed-term contract, including associated persons such as volunteers, agency staff, contractors, and others engaged under a contract of service).
- Employers (external partners who are in receipt of, and/or providing, work-based Norton Webb services).

The words 'individual(s)' and 'everyone' are used in this policy to denote all those above.

Everyone is personally responsible for upholding this policy. We expect all individuals to behave with dignity, courtesy, and respect, and to act in a non-discriminatory manner at all times.

This policy applies to all conduct in the workplace and to conduct outside the workplace that is related to our work (for example, at meetings, social events, and social interactions with colleagues), or which may impact on Norton Webb's reputation (for example, the expression of views on social media, contrary to the commitments expressed in this policy, that could be linked to Norton Webb).

As part of employee induction, staff are expected to read and familiarise themselves with this policy, ensure that this policy is properly observed and fully complied with, and complete the Employee Declaration form.

Legal Framework

This policy is informed by the following legislation and statutory duties:

- Equality Act 2010, including section 149 (Public Sector Equality Duty).
- Worker Protection (Amendment of Equality Act 2010) Act 2023, in force from 26 October 2024.
- Human Rights Act 1998.
- Civil Partnership Act 2004.
- Gender Recognition Act 2004.
- Employment Rights Act 1996.
- Rehabilitation of Offenders Act 1974, as amended by the Police, Crime, Sentencing and Courts Act 2022 (in force from 28 October 2023).

The above list is not exhaustive and is reviewed at each policy review cycle.

Protected Characteristics

Under the Equality Act 2010, the following are classified as protected characteristics:

- Age.
- Disability.
- Gender reassignment.
- Marriage and civil partnership.
- Pregnancy and maternity.
- Race (including ethnic origin, colour, nationality, and national origin).
- Religion or belief.
- Sex.
- Sexual orientation.

Discrimination on the basis of an individual's work pattern (for example, part-time working, fixed-term contract, or flexible working), where unjustifiable, will also not be tolerated.

Types of Unlawful Conduct

The Equality Act 2010 prohibits direct discrimination, indirect discrimination, discrimination by association, discrimination by perception, harassment, victimisation, and failure to make reasonable adjustments. See the Equal Opportunities Policy for detailed definitions of each, and the Harassment Policy for the procedural route for raising concerns of harassment or bullying.

Worker Protection (Amendment of Equality Act 2010) Act 2023

The Worker Protection Act 2023, in force from 26 October 2024, introduced a positive duty on employers to take **reasonable steps** to prevent sexual harassment of their employees in the course of their employment. This is a preventative duty: it requires employers to act before harassment occurs, not just to respond when complaints arise.

Norton Webb meets this duty through this policy and the related Harassment Policy and Equal Opportunities Policy, through training and awareness for staff on appropriate conduct, through clear reporting routes via the Staff Complaints and Grievance Procedure, through active line-management of workplace culture, and through periodic review of the steps taken in light of incidents, complaints, and changes to legal guidance.

Public Sector Equality Duty

Norton Webb delivers publicly-funded apprenticeship training and is therefore subject, in respect of those public functions, to the Public Sector Equality Duty under section 149 of the Equality Act 2010. The Duty requires Norton Webb to have due regard, when exercising those functions, to the need to:

- Eliminate unlawful discrimination, harassment, and victimisation.
- 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.

Norton Webb's Commitment

Every individual is entitled to an environment that promotes dignity, equality, and respect for all.

Norton Webb will not tolerate any acts of unlawful or unfair discrimination, harassment, or victimisation committed against an individual or visitor because of a protected characteristic, whether actual, perceived, or by association.

All individuals will be encouraged to develop their skills and fulfil their potential by taking advantage of training, development, and progression opportunities. Selection for employment, promotion, training, or any other benefit, will be on the basis of aptitude and ability.

Norton Webb is a Disability Confident employer and is committed to ensuring the inclusive and accessible recruitment of both staff and learners, and to providing reasonable adjustments to meet the needs of disabled people who access or provide our services.

Subject to statutory provisions, no individual will be treated less favourably than another because of belonging to a protected group — this includes equality of pay for all employees.

No form of intimidation, bullying, or harassment will be tolerated. Where an individual believes that they have suffered discrimination because of any of the above protected characteristics, they should consider the appropriateness and feasibility of informal resolution. Where this is not possible, the individual may make a

complaint, which will be dealt with through the agreed procedures for complaints and grievances or, where appropriate, the procedures set out in the Harassment Policy.

Allegations involving learners and employers will be dealt with through the routes set out in the Harassment Policy. Learners or employers who are found to have breached this policy may have their relationship terminated with Norton Webb; this includes any funded training they may be receiving.

An employee found to have breached this policy may be subject to disciplinary action under the Disciplinary Policy and Procedure. Under section 110 of the Equality Act 2010, an employee may also be named as a respondent in their personal capacity in any Employment Tribunal proceedings arising from acts of discrimination, harassment, or victimisation that they personally commit.

Promoting Good Practice

Norton Webb takes active steps to promote good practice in equality and diversity. In particular, we will:

- Subject our policies to continuous assessment in order to examine how they affect protected groups, and to identify whether they help to achieve equality of opportunity or have an adverse impact.
- Work to eliminate unlawful discrimination, harassment, and victimisation based on a protected characteristic, whether actual, perceived, or by association.
- Promote an inclusive culture, good practice in teaching, excellent learning and assessment, and good management practice through the development of best-practice policies and training.
- Take reasonable steps to remove or minimise disadvantages suffered by people due to their protected characteristics.

Training and Educating Employees

All employees undertake equality and diversity training at induction and revisit this training annually. The training is continually reviewed to ensure that the most appropriate and up-to-date content is delivered.

Periodic updates on key concepts are communicated monthly via internal communication channels. Monthly focus topics are also distributed via these channels to raise awareness and promote discussion in all areas under the wider safeguarding and equality agenda. These areas include radicalisation, mental health, disability awareness, positive relationships, and staying safe online, all of which educate employees and provide knowledge that can be passed on to learners.

Equality and diversity are referenced in team meetings, which are carried out on a quarterly basis. Equality and diversity (along with safeguarding) is one of the areas covered in the regular questions asked of learners during their monthly training meetings with tutors.

Related Policies

Document Control

UKPRN	10018297
Published	05/07/2014
Responsibility	Managing Director
Last Revised	24/04/2026
Next Review	26/04/2027

