

CAST COMMERCIAL ACUMEN LIMITED

Diversity, Equity, and Inclusion Policy

1. Introduction

- 1.1 CAST is committed to promoting equal opportunities in employment and recruitment of contractors / associates. Everyone will receive equal treatment regardless of age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex, or sexual orientation (protected characteristics).

2. Scope of Policy

- 2.1 This policy sets out our approach to equal opportunities and the avoidance of discrimination both in learning, training, and at work. It applies to all aspects of recruitment, teaching, learning, assessment, and employment with CAST.

3. Impact on Learners and Team Members

- 3.1 The implementation of this policy and procedure will support the creation of a safe learning and working environment, where learners and team members are treated fairly, with kindness and with respect. This will also help to ensure that all learners, no matter their background, values, or beliefs can learn effectively, achieving their full learning potential.

4. What we expect

- 4.1 We expect you, whether you are a learner, or a partner, customer, client, visitor or a CAST team member, to take personal responsibility for observing, upholding, promoting, and applying this policy. Our culture is made in the day-to-day working interactions between us so creating the right environment is a responsibility that we all share.
- 4.2 Cultivating this culture does not happen by accident but requires ongoing commitment and nurturing. The reality is that we live in a world where areas of difference (whether gender, sexual orientation, ethnicity, or others) often translate to perceptions, biases, judgements, challenges, and barriers that may not be faced by others. And the more areas of difference a person brings, the more this effect can be compounded. This way of looking at diversity and inclusion is known as "intersectionality".
- 4.3 We expect you to treat your peers, colleagues, and third parties fairly and with dignity, trust, and respect. Sometimes, this may mean allowing for different views and viewpoints and making space for others to contribute.
- 4.4 By embedding such values and constructively challenging inappropriate comments or ways of working, you can help us achieve and maintain a truly inclusive workplace culture and learning environments.

- 4.5 Any dealings that you have with colleagues or third parties must be free from any form of discrimination, harassment, victimisation, or bullying.
- 4.6 If any of our learners, employers, or team members are found to have committed, authorised, or condoned an act of discrimination, harassment, victimisation, or bullying, we will take action against them.
- 4.7 You should be aware that you can be personally liable for discrimination and harassment.

5. Definitions

Discrimination

- 5.1 Discrimination can be intentional or unintentional and may occur directly, indirectly, by association, or by perception (see Different types of discrimination under the Equality Act 2010).
- 5.2 There are also two specific types of discrimination that apply only to disability: "discrimination arising from disability" and "failing to make reasonable adjustments" (see Different types of discrimination under the Equality Act 2010).
- 5.3 Discrimination is not always obvious and can be subtle and unconscious. This stems from a person's general assumptions about the abilities, interests, and characteristics of a particular group that influences how they treat those people (known as "unconscious bias"). Such assumptions or prejudices may cause them to apply requirements or conditions that put those in particular groups at a disadvantage.
- 5.4 You must not unlawfully discriminate against or harass other people including current and former team members, job applicants, clients, customers, suppliers, and visitors. This applies in the workplace, and outside the workplace (when dealing with customers, suppliers, or other work-related contacts, and on work-related trips or events including social events).
- 5.5 Different types of discrimination under the Equality Act 2010
 - 5.5.1 **Direct discrimination:** Treating someone less favourably because of a protected characteristic compared with someone who does not have that characteristic (for example choosing not to recruit someone because they are disabled, and you think they "wouldn't fit in" to the team).
 - 5.5.2 **Indirect discrimination:** Where a policy, procedure, or way of working that applies to everyone puts people with a particular protected characteristic at a disadvantage, compared with people who do not have that characteristic, unless there is a good reason to justify it. An example is introducing a requirement for all staff to finish work at 6 pm. Arguably, female team members, who statistically bear the larger share of childcare responsibilities could be at a disadvantage if the new working hours prevent them from collecting their children from school or nursery.
 - 5.5.3 **Associative discrimination:** Treating someone less favourably because they are associated with someone who has a protected characteristic, for example because their partner is transgender.

5.5.4 **Discrimination by perception:** Treating someone less favourably because you perceive them to have a protected characteristic even if they do not, for example choosing not to promote someone because you mistakenly perceive them to be gay.

5.5.5 **Discrimination arising from disability:** Treating someone unfavourably because of something connected with that person's disability and where such treatment is not justified. Examples include:

- dismissing or failing to pay a bonus to someone because of their disability-related absence; or
- disciplining someone for losing their temper where such loss of temper was out of character and was due to severe pain caused by them having cancer.

5.5.6 **Failing to make reasonable adjustments:** Employers are legally obliged to make reasonable adjustments to ensure that aspects of employment, or the employer's premises, do not put a disabled person at a substantial disadvantage. Failing to comply with this duty is unlawful. Examples of reasonable adjustments might include:

- allocating some of the disabled person's duties to a colleague; or changing their working hours or place of work.
- adjusting procedures for assessing job candidates; and
- modifying disciplinary and grievance procedures.

Harassment and sexual harassment

5.6 Harassment is unwanted conduct related to a protected characteristic that has the purpose or effect of:

- violating someone else's dignity; or
- creating an intimidating, hostile, degrading, humiliating, or offensive environment for someone else.

5.7 Sexual harassment is:

- conduct of a sexual nature that has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading humiliating, or offensive environment; and
- less favourable treatment related to sex or gender reassignment that occurs because of a rejection of, or submission to, sexual conduct.

5.8 You should refer to our Anti-harassment and anti-bullying policy for further information on our procedure for reporting harassment.

Victimisation

- 5.9 Victimisation is treating another person detrimentally either because that person has made a complaint of discrimination or harassment, or because they have supported someone else who has made such a complaint, for example by giving a witness statement that supports the allegations.

Bullying

- 5.10 There is no legal definition of bullying. However, we regard it as conduct that is offensive, intimidating, malicious, insulting, or an abuse or misuse of power, and usually persistent, that has the effect of undermining, humiliating, or injuring the recipient.
- 5.11 Bullying can be physical, verbal, or non-verbal conduct. It is not necessarily face-to-face and can be done by email, phone calls, online, or on social media. Bullying may occur at work or outside work.
- 5.12 If the bullying relates to a person's protected characteristic, it may also constitute harassment and, therefore, will be unlawful (see Harassment above).
- 5.13 You should refer to our Anti-harassment and anti-bullying policy for further information on our procedure for reporting bullying.

6. Diversity, Equity, and Inclusion in Learning

- 6.1 CAST seeks to increase participation and achievement of under-represented minority groups within the learning sector through:
- Working with customers and clients to ensure that under-representation through promotion of available courses to young people, adults, those from minority and disadvantaged groups.
 - Regularly promoting courses to young people, including those from minority or disadvantaged groups
 - Developing relationships with partners, charities, and third sector organisations to widen participation of minority groups.
 - Developing a range of promotional case studies to encourage those under-represented to attend available courses.
 - Using promotional materials which reflect and reinforce the diversity of society and where appropriate counter stereotypes.
 - Ensuring the early identification of potential barriers to learning and providing support to succeed in learning.
 - Liaising with learners and their employers to develop action plans to address any negative trends identified.

- 6.2 CAST seeks to increase participation and achievement of under-represented minority groups within the learning sector through:
- Frequent monitoring of appropriate Key Performance Indicators (KPIs) to measure participation and achievement rates of different groups of learners.
 - More detailed evaluation of achievement and participation trends which are externally benchmarked.
 - Annual evaluation of participation and achievement by age, BAME identity, gender, and disability status.
 - Effective evaluation of Learner Voice results by key demographics.
 - Evaluation of performance trends as part of the self-assessment process.
 - Effective application of plans to secure improvement where needed.

7. Diversity, Equity, and Inclusion in recruitment and employment

- 7.1 CAST will avoid unlawful discrimination in all aspects of employment including recruitment of employees, contractors and associates, promotion, opportunities for training, pay and benefits, discipline, and selection for redundancy.
- 7.2 Recruitment, promotion, and other selection exercises such as redundancy selection will be conducted based on merit, against objective criteria that avoid discrimination.
- 7.3 Advertisements will avoid stereotyping or using wording that may discourage particular groups from applying. Applicants will not be asked questions that might suggest an intention to discriminate on grounds of a Protected Characteristic. For example, applicants should not be asked whether they are pregnant or planning to have children.
- 7.4 Job applicants will not be asked about health or disability before a job offer is made, except in the very limited circumstances allowed by law: for example, to check that the applicant could perform an intrinsic part of the job (taking account of any reasonable adjustments), or to see if any adjustments might be needed at interview because of a disability. Where necessary, job offers can be made conditional on a satisfactory medical check. Health or disability questions may be included in equal opportunities monitoring forms, which must not be used for selection or decision-making purposes.
- 7.5 Candidates for employment or promotion will be assessed objectively against the requirements for the job, taking account of any reasonable adjustments that may be required for candidates with a disability. Disability and personal or home commitments will not form the basis of employment decisions except where necessary.
- 7.6 Part-time and fixed-term team members will be treated the same as comparable full-time or permanent team members and enjoy no less favourable terms and conditions (on a pro-rata basis where appropriate) unless different treatment is justified.

Gender

7.7 People are fully and properly represented and supported through:

- Challenging gender stereotypes.
- Supporting team members in balancing their life at work and at home.
- Supporting team members who are having children, and
- Taking active steps to facilitate their return to work after parental leave e.g., maternity, paternity, adoption, shared parental leave.

Trans-gender status

7.8 People who plan to undergo, are undergoing, or have undergone gender re-assignment are protected against all forms of discrimination and harassment. CAST will take positive steps to support a transgender person and ensure they are treated with dignity and respect.

Marital status

7.9 People are treated fairly and equally in the workplace irrespective of their marital, civil partnership, or family status.

Race

7.10 The racial and cultural diversity of our communities is represented through:

- Challenging racial stereotypes; and
- Understanding, respecting, and valuing different racial and cultural backgrounds and perspectives.

Disabilities

7.11 This section includes both disabilities that can be seen, e.g., physical disabilities and those that are unseen e.g., mental illness.

7.12 If you are disabled or become disabled, we encourage you to tell us about your condition so that we can consider what reasonable adjustments or support may be appropriate.

7.13 The Company will make reasonable adjustments to its standard working practices to overcome barriers caused by disability.

Age

7.14 Age diversity within the workforce is promoted and valued through:

- Challenging age stereotyping; and
- Recognising the benefits of a mixed-age workforce.

Religious belief and political opinion

- 7.15 People are treated fairly in the workplace irrespective of their religious beliefs and practices or political opinions by recognising individuals' freedom of belief and right to protection from intolerance and persecution.

HIV

- 7.16 Discrimination against a team member or potential team member on grounds that they have, or are thought to have, HIV or AIDS is not acceptable, and confidentiality will be respected in line with the wishes of an individual with HIV or AIDS.

Sexuality

- 7.17 People are treated fairly in the workplace irrespective of their sexuality through:
- Respecting different lifestyles; and
 - Challenging negative stereotypical views.

Part-time and fixed-term work

- 7.18 Part-time and fixed-term team members will be treated the same as comparable full-time or permanent team members and enjoy no less favourable terms and conditions (on a pro-rata basis where appropriate) unless different treatment is justified.

8. Breaches of this Policy


- 8.1 CAST takes a strict approach to breaches of this policy which will be dealt with by the relevant Disciplinary Procedure. Serious cases of deliberate discrimination may amount to gross misconduct resulting in dismissal from employment, cancellation of contracts, cancellation of associate agreement or dismissal from learning.
- 8.2 If you believe that you have suffered discrimination you can raise the matter through the Grievance, Complaints, Compliments or Comments or Whistleblowing Procedure. Complaints will be treated in confidence and investigated as appropriate.
- 8.3 You will not be victimised or retaliated against for complaining about discrimination. However, making a false allegation deliberately and in bad faith will be treated as misconduct and dealt with under the relevant Disciplinary Procedure.

9. Communication and Engagement

- 9.1 Where possible, this policy will be shared with learners as part of the sign-up and enrolment process, and confirmation of this will form part of the signed Commitment Statement between CAST, and the learner and will be available on the CAST website. Themes of equality, diversity, and inclusion are embedded throughout all programmes of learning.
- 9.2 This policy will be shared with CAST team members as part of their induction schedule. All team members are required to undertake training on equality diversity and inclusion on an annual basis or sooner if changes to the policy or procedure are implemented.

10. Policy Review and Implementation

- 10.1 CAST shall review this Policy not less than two years and otherwise as required in order to ensure that it remains up-to-date and fit for purpose.
- 10.2 This Policy will be updated as necessary to reflect current best practice, official guidance, and in line with current legislation.
- 10.3 This Policy shall be deemed effective as of 13th April 2023. No part of this Policy shall have retroactive effect and shall thus apply only to matters occurring on or after this date. This Policy has been approved and authorised by:

Document title:	Diversity, Equity, and Inclusion Policy
Document status:	Final
Version number:	1.0
Date:	April 2023
Review date:	April 2025
Owner:	Managing Director
Approved by:	Clayton John Ainger
Signature:	

This Equality, Diversity, and Inclusion policy is not contractual and may be varied by Cast Commercial Acumen Limited at any time.