



Equality, Diversity & Inclusions Policy



Equality, Diversity & Inclusion Policy

1. Introduction

APA is committed to supporting, developing and promoting equality, diversity and inclusiveness in all of its practices. We aim to establish an inclusive culture free from discrimination and based upon our values. The company will support and develop our employees and learners through providing all with access to facilities, personal and career development opportunities, employment and study on the basis of equality.

APA is committed to eliminating discrimination and advancing equality on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief (including lack of belief), sex and sexual orientation and to fostering good relations between different groups.

This policy builds upon the foundation of equality legislation, anti-discrimination guidance and strives, not only to comply with legal requirements, but to use these to ensure that APA endeavours to exemplify best practice.

APA values diversity and recognises that the institution is greatly enhanced by the disparate range of backgrounds, experiences, views, beliefs and cultures represented within its staff and amongst our learners. The company aims to embrace diversity in all of its activities and proudly acknowledges that variety and difference are intrinsic to the wellbeing and future development of the company.

2. Purpose

This policy sets out APA's strategy for managing and implementing equality, diversity and inclusion. It outlines APA's approach to embedding equality, diversity and inclusion in all aspects of learning and work, embracing all staff and learners regardless of background, age, sex, religion, ethnicity, sexuality or disability, with a view to providing a fair environment for all.

3. Definitions

Equality – refers to the elimination of unlawful and unfair direct and indirect discrimination of particular groups and promoting equal access, treatment and outcomes that take into account specific needs of individuals.

Diversity – encompasses visible and non-visible individual differences that includes, but is not limited to, differences protected by anti-discrimination legislation. Appreciating diversity is about valuing differences and recognising that everyone through their unique mixture of skills and experience has their own valuable contribution to make.

Inclusion - Inclusion links with diversity and equality. It is important to understand someone's differences so that you can include them and treat them equally and fairly.

Equity - Equity ensures fairness by recognizing and addressing different needs and circumstances. It's about giving everyone exactly what they need to achieve equal outcomes,

focusing on dismantling barriers that prevent full participation. Unlike equality's broad approach, equity tailors support to overcome historical and structural disadvantages, aiming for genuine inclusivity and equal opportunities for all.

4. Roles and responsibilities

Role	Responsibilities
Leadership Team	Overall accountability for equality, diversity and inclusion (EDI) across the organisation, including ensuring suitable resourcing, oversight, and that actions are taken where gaps are identified. Maintains this policy; ensures it is reviewed on schedule; coordinates staff communications and training; ensures related
Policy owner (HR)	policies and procedures are consistent (e.g., complaints, grievance/disciplinary, safeguarding, malpractice/maladministration, data protection). Ensures EDI is embedded in the learner journey (admissions, induction, teaching, assessment preparation, learner support) and that monitoring and quality improvement actions are implemented and evidenced.
Quality lead / Centre lead (learning provision)	Apply inclusive teaching and support practices; identify and remove barriers where possible; respond appropriately to concerns; maintain confidentiality; escalate issues in line with reporting routes and procedures.
Tutors and support staff	Treat others with dignity and respect; contribute to an inclusive learning environment; raise concerns promptly using the reporting routes set out in this policy and in the learner handbook.
Learners	

Named contacts (e.g., course coordinator and SMT contact details) are maintained in the Learner Handbook and internal staff guidance so that the most current contact information is always available.

4. Legal Background

The overarching legal requirement is the Equality Act 2010 and all staff must comply. This policy helps clarify how we can meet our legal obligations. For the sake of clarity some key, and important descriptors are defined below:

- Diversity - is about recognising, valuing and taking account of people's different backgrounds, knowledge, skills, and experiences, including encouraging and using those differences to create a productive and effective workforce.
- Direct discrimination - this occurs when a person is treated less favourably than other people are or would be treated. This is where there is no difference in circumstances and the reason for the treatment is due to a personal protected characteristic.
- Indirect discrimination - this occurs when rules or practices, which are applied equally to everybody, and result in certain people being put at a disadvantage.
- Dual discrimination - this occurs when there is direct discrimination on two grounds. A person may be discriminated against because of disability and gender or because of race and disability.

- Multiple discrimination - this occurs when there is direct discrimination on the grounds of several aspects of a person's identity. For example, a black lesbian may experience racism, homophobia and gender prejudice.
- Discrimination by association - this is when an individual is discriminated against through their association with another person. For example, an individual may be harassed due to the religion or race of their partner.
- Harassment - behaviour that is unwelcome or unacceptable, and which results in the creation of a stressful or intimidating environment for the victim. It can consist of verbal abuse, racist jokes, insensitive comments, leering, physical contact, unwanted sexual advances, ridicule or isolation.
- Victimise - when an individual is victimised because they made, or intend to make, a complaint or allegation or has shown intent to give evidence in relation to a complaint of discrimination in line with the Equality Act.
- Protected characteristics - under the Equality Act 2010, the following characteristics are legally protected from discrimination, meaning it's unlawful to treat someone unfairly because of any of these aspects of their identity:
 - Age
 - Disability
 - Gender reassignment
 - Marriage and civil partnership
 - Pregnancy and maternity
 - Race
 - Religion or belief
 - Sex
 - Sexual orientation

5. This policy aims to promote:

5.1 Our Commitment

- To staff...APA will continuously strive to create an environment in which individual differences and the contributions of all our staff are recognised and valued; and in which training, development and progression opportunities are available to all staff.
- To learners...All learners will be treated with fairness and respect, ensuring they receive a consistent and equitable learning experience that actively promotes inclusivity, removes barriers, and supports their full participation and success.
- To management... To enhance the engagement and contribution of all staff and learners by adopting equality in the workplace as a key aspect of effective management, positively impacting the entire business.
- To all ...Every employee and every learner is entitled to a working environment that promotes and ensures dignity and respect for all. No form of intimidation, bullying or harassment will be tolerated;
- Breaches of our equality policy will be regarded as misconduct and could lead to disciplinary proceedings;
- We will review all our employment practices and procedures to ensure fairness;

5.2 Objectives

- To create a working environment for all employees and learners that is free from discrimination, harassment and bullying;
- To ensure equal treatment for all employees/applicants and learners regardless of their; age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, gender and sexual orientation;
- To ensure that all learners, regardless of their background, characteristics, or personal circumstances, are given the support and opportunities they need to achieve success;
- To ensure that no employee or learner is treated detrimentally because they have made a complaint or intend to make a complaint about discrimination or harassment, or have, or are about to give evidence in relation to discrimination or harassment;
- To support equality in employment and ensure equal opportunity is an integral part of APA's employee relations approach;
- To encourage all employees to develop their potential, skills and abilities, recognising that the future success of the organisation depends on attracting and developing a diverse, high-calibre workforce in an increasingly competitive world;
- To apply the principles of equality in the context of all conditions of work including selection, employment, pay and benefits (excluding any statutory provisions which may apply), facilities, promotion and training. The policy applies to the management of APA, its employees, partners and agents all of whom are responsible for ensuring there is no discrimination, direct or indirect, against any employee or group of employees.

5.3 Respect

APA seeks to promote a workplace where staff and learners treat one another with respect and value each other's differences. As such, there is a responsibility on every employee to be familiar with and uphold the principles of this policy. Some of the behaviours we would expect to see in our employees are as follows: (please refer to The Code of Conduct & Behaviour Policy for a more detailed list).

- Ensuring that all staff treat each other with respect;
- Recognising each other's skills and knowledge;
- Taking into account other people's backgrounds and experience;
- Understanding each other;
- Valuing colleagues' professional integrity and judgement;
- Recognising differences, such as culture, age and background, and seeing them as a strength;
- Being open and inclusive;
- Promoting equality of opportunity in workplace activities;
- Avoiding stereotyping;
- Ensuring all colleagues are treated fairly in all work situations.
- Any employee who observes behaviour they perceive to be contrary to the principles of this policy should discuss this with their line manager or a member of the HR team.

5.4 Equity:

APA acknowledges that achieving equity requires proactive measures to identify and dismantle barriers to access and success. We recognize that individuals may face intersecting forms of discrimination based on various aspects of their identity, such as race, gender, disability, sexual orientation, or socioeconomic status. Therefore, we are committed to implementing strategies that promote fairness and justice for all, regardless of these characteristics.

Application of Key Principles of Equity:

- **Fair Treatment:** Equity necessitates fair treatment for all individuals, irrespective of their background or identity. This means ensuring that everyone has equal access to opportunities, resources, and support systems within our organization.
- **Inclusive Practices:** We embrace inclusive practices that value diversity and foster a sense of belonging for all members of our community. By actively involving individuals from diverse backgrounds in decision-making processes and creating spaces where everyone's voice is heard and respected, we strive to create an environment where everyone can thrive.
- **Addressing Disparities:** Equity requires us to address disparities in access, representation, and outcomes that exist within our organization. We are committed to identifying and rectifying inequities through targeted interventions, such as flexible working, mentorship programs, leadership development initiatives, and resources tailored to the specific needs of marginalized groups.
- **Continuous Improvement:** Equity is an ongoing commitment that requires continuous reflection, learning, and improvement. We are dedicated to regularly evaluating our policies, practices, and outcomes to identify areas for enhancement and ensure that our efforts to promote equity are effective and sustainable.
- **Transparency and Accountability:** We believe in transparency and accountability in our efforts to promote equity. We are committed to being transparent about our goals, progress, and challenges related to equity, and we hold ourselves accountable to our staff, learners, and stakeholders for advancing equitable practices and outcomes.
- By prioritizing equity in all aspects of our operations, APA aims to create a more just, inclusive, and supportive environment where everyone has the opportunity to thrive and contribute to our shared success.

6. Application of the Policy – as an employer

6.1 Training

- It is mandatory for all staff to read this policy as part of their induction. They will also be required to read the yearly updates.
- Equality and diversity awareness training will be mandatory for all staff. Information will be provided to all employees in order to raise awareness of equality and diversity and to remind them the contents of this policy.
- Providing unconscious bias training for all tutors to ensure equal treatment of learners and to mitigate potential biases.
- Providing unconscious bias training for all those involved in the recruitment and selection process to mitigate potential biases.
- Providing information and resources to raise awareness of equity-related issues and the contents of the policy.

6.2 Recruitment/Selection

We will ensure that our recruitment processes are transparent, free from bias and non-discriminatory, we will appoint the most appropriately qualified person for the position available on the basis of their skills and competencies, having regard to the job description. In order to maintain this commitment, the following should be adhered to:

- Application forms should not ask for information that is irrelevant to the job, e.g. the sex or sexual orientation of the applicant, nationality or place of birth, marital or partnership status, number and ages of children, religious beliefs and age or date of birth;
- Job advertisements will be written in non-discriminatory language in terms of race, ethnic or national origins, colour, religion or religious beliefs, sex or sexual orientation, gender reassignment, age, disablement, and marital or partnership status, unless there is a genuine occupational reason for a restriction;
- Job vacancies will be advertised in ways that do not exclude or disproportionately reduce the number of applicants from any particular group;
- Job advertisements should be placed in a manner that is likely to reach all possible candidates;
- All jobs should have a job description and person specification that can be used to ensure a consistent approach to the interview, and for answering the questions of applicants during the interview;
- Photographs of applicants should not be requested;
- Job requirements must be reasonable and strictly related to the job. Educational requirements should be job related and overseas equivalent qualifications will be considered. Each applicant should be assessed on his/her personal capability to carry out the job as described in the job description;
- Age should not automatically debar any applicant for the job;
- All applicants should be handled consistently (e.g. there should not be separate lists of male and female applicants);
- All job interviews will be conducted in a consistent manner;
- Reasonable adjustments will be made for any applicant with a disability to attend an interview that meet the criteria for the role;
- Interview notes must be recorded in a consistent manner and retained securely in HR for 6 months for unsuccessful candidates and within personnel files for successful candidates and current employees.

6.3 Recruitment of Ex-offenders

- As an organisation using the Disclosure and Barring Service (DBS) checking service to assess applicants' suitability for positions of trust, APA complies fully with the Code of Practice and undertakes to treat all applicants for positions fairly. It undertakes not to discriminate unfairly against any subject of a DBS check on the basis of a conviction or other information revealed.
- APA is committed to the fair treatment of its staff, potential staff or users of its services, regardless of race, gender, religion, sexual orientation, responsibilities for dependents, age, physical/mental disability or offending background.
- We actively promote equality of opportunity for all with the right mix of talent, skills and potential and welcome applicants from a wide range of candidates, including those with criminal records. We select all candidates for interview based on their skills, qualifications and experience.
- Unless the nature of the position allows APA to ask questions about an entire criminal record, we only ask about 'unspent' convictions as defined in the Rehabilitation of Offenders Act 1974.

- At interview, or in a separate discussion, we ensure that an open and measured discussion takes place on the subject of any offences or other matter that might be relevant to the position. Failure to reveal information that is directly relevant to the position sought could lead to withdrawal of an offer of employment.
- We undertake to discuss any matter revealed in a DBS check with the person seeking the position before withdrawing a conditional offer of employment.

6.4 Staff Development

- All staff will have equal access to induction, personal and career development opportunities and facilities.
- Performance Management - Probation and appraisal procedures will be clear and transparent and will be applied fairly across all staff.
- Discipline and Grievance - Disciplinary and grievance procedures will be applied fairly and transparently for all staff. Allegations of discrimination, harassment or inappropriate behaviour will be dealt with under the appropriate disciplinary procedures for staff.

6.5 Grading Appraisal and Promotion

- All grading and promotions criteria and procedures will be free from prejudice and must be applied equitably and consistently.
- All staff will be entitled to an annual appraisal and feedback from their line manager.
- At appraisal we may ask under safeguarding arrangements, whether there is anything the member of staff wishes to declare following the date of the DBS check.

7. Application of the Policy – as a training provider

To ensure that APA's commitment to equality, diversity, and inclusion is fully embedded in the teaching and learning experience, the following measures will be applied:

7.1 Admissions & Enrolment

- The admissions process will be structured to eliminate bias and ensure fair access for all applicants, regardless of background or protected characteristics.
- Reasonable adjustments will be offered to applicants with disabilities or other specific needs to ensure they can fully participate in the enrolment process.

7.2 Classroom Support

- Instructors will implement inclusive teaching methods that cater to different learning styles and abilities.
- Additional academic support will be available for students who require extra assistance, including one-on-one tutoring and study groups.
- Training on inclusive classroom management and bias awareness will be mandatory for all teaching staff.

7.3 Access to Learning Materials

- All course materials will be designed to be accessible, including alternative formats for students with visual, hearing, or learning impairments.
- Digital resources will be made available to ensure that students from diverse backgrounds can engage with course content in ways that suit their needs.
- Course content will be regularly reviewed to ensure diverse perspectives are represented.

7.4 Assessment & Exam Support

- APA will provide adjustments for exams and assessments in line with students' individual needs, such as extra time or remote invigilation. Please see the CIPS [Reasonable adjustments and special consideration policy](#) for further information.
- Assessments will be designed to be fair and inclusive, avoiding cultural biases that may disadvantage certain student groups.
- Feedback will be constructive and delivered in a way that supports all students in their academic development.

7.5 Learner Training & Awareness

- APA will ensure that the EDI policy is made available to all learners upon enrolment and reinforced through student handbooks and induction sessions.
- EDI principles will be actively promoted within training programs, embedding discussions on diversity, inclusion, and equality throughout the learning experience.
- Where applicable, additional training opportunities on EDI topics will be offered to learners, including workshops on EDI and unconscious bias.

7.6 Ongoing Monitoring & Improvement

7.7 Monitoring, record-keeping, reporting and quality improvement

APA uses monitoring and quality improvement processes to ensure our learning provision remains inclusive and to identify and address any barriers to participation or achievement. This includes (where lawful, appropriate and proportionate):

- **Equality monitoring data (where provided voluntarily):** We may collect equality monitoring information separately from enrolment decisions to help us understand our learner profile and identify potential disparities.
- **Learner engagement and progress:** Attendance/engagement indicators (where applicable), progression, completion and achievement outcomes, reviewed by cohort/level/mode of delivery.
- **Reasonable adjustments:** Volume and type of adjustments requested and implemented (without unnecessary personal detail), timeliness of implementation, and any themes or barriers identified.
- **Feedback and complaint's themes:** Analysis of learner feedback (including inclusivity questions where used) and complaints to identify themes, root causes, and improvement actions.
- **Staff CPD and training completion:** Completion and effectiveness of EDI-related training and updates for staff and tutors.

Monitoring is reviewed at least annually (and more frequently where risks or issues are identified). Actions are recorded, assigned owners and due dates, and followed through as part

of APA's quality improvement planning. Where relevant, learning and assessment materials, delivery approaches, and learner support arrangements are updated in response to findings.

- APA will regularly review student outcomes to identify disparities and implement corrective measures where necessary.
- A dedicated EDI representative will be available to address any concerns related to teaching, learning materials, or assessment processes.
- Student feedback on inclusivity in teaching will be collected and used to inform ongoing improvements to curriculum and delivery.

8. Learner Support & Reasonable Adjustments

8.1 Learner Support Services

APA is committed to ensuring that all learners are supported to access, participate in, and successfully complete their learning programmes.

Learner support services are available to all learners and are designed to remove barriers to learning, promote equality of opportunity, and support individual learning needs. Support may include, but is not limited to:

- Academic support, including guidance from tutors, additional learning resources, and one-to-one support where appropriate
- Support for learners with disabilities, learning difficulties, health conditions, or temporary injuries
- Support for learners experiencing personal circumstances that may impact their learning
- Access to learning materials in alternative or accessible formats
- Guidance on assessment arrangements and progression

8.2 Information about learner support services is provided to learners:

- During the enrolment and onboarding process
- At induction
- Within learner handbooks and course documentation
- Via tutors or APA staff as required throughout the programme

8.3 Equality of Access to Learning and Assessment

APA ensures equality of opportunity and access to learning and assessment for all learners, regardless of background, protected characteristics, or individual circumstances.

Arrangements to support equality of access include:

- Fair and transparent admissions and enrolment processes
- Inclusive teaching and learning approaches that accommodate different learning styles and abilities
- Accessible learning materials and digital resources
- Fair, valid, and reliable assessment practices
- Constructive and supportive feedback processes

APA regularly reviews learner outcomes and feedback to identify and address any potential barriers to access, participation, or achievement.

8.4 Reasonable Adjustments

8.4a Reasonable adjustments procedure (learning and assessment)

1. **Request:** Learners can request reasonable adjustments at enrolment, induction, or at any point during their programme by contacting the course coordinator contact listed in the Learner Handbook (or by speaking with their tutor who will signpost/raise the request).
2. **Discussion and evidence (where relevant):** We will discuss the request confidentially with the learner to understand the impact of the need. We may ask for supporting evidence only where it is relevant and proportionate.
3. **Decision:** We will confirm whether the adjustment is reasonable and can be implemented, taking account of the learner's needs, operational feasibility, and (where assessment is involved) the requirement to maintain assessment integrity.
4. **Implementation:** Adjustments will be agreed with the learner, recorded, and communicated on a need-to-know basis to relevant staff (e.g., tutor, invigilation/exam administration) so they can be put in place consistently.
5. **CIPS approval where required:** For CIPS assessments, where awarding body approval is required, APA will support the learner to apply in line with the CIPS Reasonable Adjustments and Special Consideration Policy and will liaise with CIPS as needed.
6. **Review:** Adjustments are reviewed periodically and whenever circumstances change, to ensure they remain effective and appropriate.
7. **Records and confidentiality:** Records are kept securely and handled in line with data protection requirements; information is only shared as necessary to provide support.

APA is committed to facilitating reasonable adjustments for learners with particular requirements, difficulties, or disabilities to ensure that they are not disadvantaged in accessing learning or assessment.

Reasonable adjustments may apply to:

- Teaching and learning activities
- Learning materials and resources
- Assessment methods and conditions
- Communication and engagement processes

Examples of reasonable adjustments may include:

- Additional time for assessments
- Alternative assessment formats
- Assistive technologies
- Adapted learning materials
- Flexible learning arrangements

Requesting Reasonable Adjustments

Learners who require reasonable adjustments are encouraged to notify APA as early as possible, ideally at enrolment or induction, to allow sufficient time for arrangements to be made.

Requests for reasonable adjustments:

- Will be considered on an individual basis
- May require appropriate supporting evidence, where relevant
- Will be discussed confidentially with the learner
- Will be implemented in a way that maintains the integrity, validity, and reliability of assessments

Where adjustments relate to assessment, APA will ensure that arrangements align with awarding body requirements.

CIPS Reasonable Adjustments

For CIPS qualifications, APA applies reasonable adjustments and special consideration in line with the CIPS Reasonable Adjustments and Special Consideration Policy.

Learners undertaking CIPS qualifications are advised to refer to the CIPS policy for further guidance:

<https://www.cips.org> (Reasonable Adjustments and Special Consideration Policy)

APA will liaise with CIPS as required to ensure that all reasonable adjustments are approved and applied in accordance with CIPS regulations.

8.5 Confidentiality and Review

All information relating to learner support needs and reasonable adjustments will be treated confidentially and used solely for the purpose of providing appropriate support.

Reasonable adjustments will be:

- Reviewed regularly
- Updated where a learner's circumstances change
- Withdrawn where no longer required, in consultation with the learner

9. Responsibilities

- Every employee has a responsibility to assist the business in creating and maintaining a workplace free from discrimination. Employees should be aware that they too can be personally liable for a discriminatory act as well as, or instead of the Company, and may also be guilty of a criminal offence. Any employee who commits a discriminatory act will be subject to the Company's disciplinary procedure that could lead to action being taken up to and including dismissal on the grounds of gross misconduct.
- Our Leadership Team have overall responsibility for ensuring this policy is adhered to with day-to-day responsibility for its operation being delegated to line managers. In the event you believe that you have been discriminated against please contact your Line Manager in the first instance. If this is not appropriate, please contact a member of the HR team.

- Any matter raised will be treated seriously, confidentially and will be dealt with sensitively. In the event that a malicious allegation is made, due to the potential consequences to the individual concerned, this could result in disciplinary action being taken against the person making the allegation.
- Matters raised will be subject to the grievance and disciplinary procedures as appropriate.
- Learners are responsible for reading and understanding the EDI policy, adhering to its principles, and ensuring their actions align with APA's commitment to equality, diversity, and inclusion.
- Learners must treat fellow students and APA staff with respect, fostering a learning environment that is inclusive, supportive, and free from discrimination or harassment.

10. Reporting process

If a learner, member of staff, or visitor has a concern relating to equality, discrimination, harassment, bullying or exclusion, they should raise it as soon as possible. Concerns can be raised with a tutor, line manager, or the course coordinator contact listed in the Learner Handbook.

All concerns will be taken seriously, handled sensitively and (as far as possible) confidentially. Information will be shared only on a need-to-know basis so that appropriate action and support can be provided.

Where appropriate, matters will be managed under the relevant procedure (for example: learner complaints, staff grievance/disciplinary, safeguarding, or malpractice/maladministration). Learners should refer to the Learner Handbook for the complaints process and escalation stages, including how to refer unresolved complaints to CIPS where applicable.

APA will keep appropriate records of concerns raised and actions taken, stored securely and in line with data protection requirements. Themes and trends (with personal data minimised) may be used to support quality improvement.

11. Communication of this Policy

This policy will be communicated to and made available to all employees via the company intranet, and to all learners via the company website.

12. Policy Review

This policy was reviewed on 28th April 2026