HBXL Equality, Diversity & Inclusion Policy

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Notes	Please also refer to: • HBXL Staff Anti-Harassment and Bullying Policy In Staff Handbook • HBXL Learner Anti-Bullying and Anti-Harassment Policy • HBXL Special Educational Needs & Disabilities Policy • HBXL Flexible Working Policy • HBXL External Speaker Policy and Procedure

1. Equal opportunities statement

HBXL is committed not only to ensuring equality of opportunity and preventing unlawful discrimination, but also to actively promoting diversity, inclusion, and a sense of belonging for all employees, learners, and stakeholders. Job applicants or learners on Skills Academy training, including DfE Skills Bootcamps, 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). We value the unique contribution each individual brings and believe that a truly inclusive culture enhances creativity, collaboration, and performance.

We aim 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 and understanding between different groups.
- Champion inclusion in every aspect of our work.

2. Scope

This policy applies to:

- All employees, workers, contractors, volunteers, and job applicants.
- All learners on Skills Academy programmes, including DfE Skills Bootcamps.
- Suppliers, contractors, and partners, who are expected to work in accordance with our EDI principles.

3. About this policy

Our policy complies with the Equality Act 2010 and covers the following *protected characteristics*: Age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality, ethnic or national origin), religion or belief, sex, and sexual orientation.

We also recognise the importance of other factors that can affect equality and inclusion, including socio-economic background, caring responsibilities, and neurodiversity.

Equality, diversity and inclusion are integral to HBXL's safeguarding and Prevent arrangements. Discriminatory behaviour, extremist views, harassment or intolerance are treated as safeguarding concerns and escalated to the Designated Safeguarding Lead (DSL) in line with HBXL's Adult Safeguarding Policy and Prevent Risk Assessment.

This policy sets out our approach to equal opportunities and the avoidance of discrimination. It applies to all aspects of employment with us, including recruitment, pay and conditions, training, appraisals, promotion, conduct at work, disciplinary and grievance procedures, and termination of employment. It also applies to learner enrolment on Skills Academy training with HBXL.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

4. Discrimination and definitions of unlawful conduct

Employees must not unlawfully discriminate against or harass other people including current and former employees, job applicants, clients, customers, suppliers and visitors or learners on Skills Academy training. This applies in the workplace, outside the workplace (when dealing with customers, suppliers or other work-related contacts), and on work-related trips or events including social events.

The following forms of discrimination are prohibited under this policy and are unlawful:

- Direct discrimination: treating someone less favourably because of a Protected Characteristic. For example, rejecting a job applicant or Skills Bootcamp learner because of their religious views or because they might be gay.
- Indirect discrimination: a provision, criterion or practice that applies to everyone but adversely affects people with a particular Protected Characteristic more than others, and is not justified. For example, requiring a job to be done full-time rather than part-time would adversely affect women because they generally have greater childcare commitments than men. Such a requirement would be discriminatory unless it can be justified.
- Harassment: this includes sexual harassment and other unwanted conduct related to a Protected Characteristic, which has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. Harassment is dealt with further in our Learner Anti-Bullying and Anti-Harassment Policy and Staff Anti-harassment and Bullying Policy in the HBXL Staff Handbook.
- Victimisation: retaliation against someone who has complained or has supported someone else's complaint about discrimination or harassment.
- Disability discrimination: this includes direct and indirect discrimination, any unjustified less favourable treatment because of the effects of a disability, and failure to make reasonable adjustments to alleviate disadvantages caused by a disability.

5. Positive Action & Proactive Measures

In addition to preventing discrimination, HBXL will:

- Actively encourage applications from underrepresented groups in our workforce and learner community.
- Engage in outreach programmes, partnerships, and community events to widen participation.
- Remove unnecessary barriers in recruitment, enrolment, and progression.
- Promote inclusive learning and working environments through accessible materials, varied teaching methods, and flexible working arrangements.

HBXL recognises the diverse needs of adult learners, including career changers, unemployed adults, older learners, those with caring responsibilities, and individuals returning to learning. We commit to removing barriers to participation through flexible delivery, accessible digital platforms, and personalised learner support.

6. Roles and Responsibilities

Senior Leadership: Ensure resources and commitment for EDI initiatives, review progress annually, and lead by example.

Managers/Tutors: Apply this policy in all decision-making, support team/learner diversity, and intervene in inappropriate behaviour.

All Staff & Learners: Treat others with dignity and respect, challenge discrimination, and participate in inclusion activities.

EDI Lead: Monitor diversity data, oversee EDI training, and report findings and recommendations to the leadership team.

7. Training and Awareness

- All new employees and trainers receive EDI induction training.
- All staff attend annual refresher training, including unconscious bias awareness.
- Tutors receive training on inclusive teaching, differentiation, and supporting neurodiverse learners.
- Promotion of key cultural and awareness events throughout the year.

8. Curriculum Design

Inclusive curriculum design is embedded across all Skills Academy programmes. Teaching materials are checked for bias, representation and accessibility. Assessment methods are adapted where appropriate to ensure fairness and accessibility.

9. Recruitment and selection

Recruitment, promotion and other selection exercises such as redundancy selection or Skills Academy training learner enrolment will be conducted on the basis of merit, against objective criteria that avoid discrimination. Shortlisting should be done by more than one person if possible.

Vacancies should generally be advertised to a diverse section of the labour market. Advertisements should avoid stereotyping or using wording that may discourage particular groups from applying.

Job applicants or learners enrolling on a course should not be asked questions which 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.

Job applicants or learners enrolling on a course should not be asked about health or disability before a job offer or place on a Skills Academy training course 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 or attend the course (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.

We will ensure job adverts and course publicity are inclusive, accessible, and encourage diverse applicants. Selection will be merit-based, using clear, objective criteria.

Employers, subcontractors and guest speakers working with HBXL must adhere to our EDI principles. Due diligence checks include safeguarding, Prevent, anti-discrimination, accessibility and ethical conduct. Any breach triggers investigation and may result in removal from partnership.

10. Disabilities

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.

11. Reasonable Adjustments

HBXL ensures all Skills Academy learners can fully participate through reasonable adjustments, including accessible learning materials, adapted assessments, flexible scheduling, digital support, and alternative formats. Adjustments are agreed during enrolment and reviewed throughout delivery.

Digital inclusion is a core part of our EDI approach. HBXL provides support for learners with limited digital confidence or access, including device loans, guidance on using online platforms, and alternative formats for those requiring adjustments.

12. Part-time and fixed-term work

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

13. Monitoring and Review

HBXL monitors EDI across the full learner journey, including enrolment, attendance, achievement and progression outcomes. Data is reviewed by the Skills & Quality Assurance Manager and reported to senior leadership and, from September 2026, the Board of Governors. Findings inform the Quality Improvement Plan (QIP) and curriculum development.

Diversity and inclusion data will be collected (in line with GDPR) for staff and learners to help monitor representation and outcomes.

Policy effectiveness will be reviewed annually and updated as required.

Feedback will be sought from staff, learners, and stakeholders on inclusivity and fairness.

14. Breaches of this policy

We take a strict approach to breaches of this policy, which will be dealt with in accordance with our Disciplinary Procedure. Serious cases of deliberate discrimination may amount to gross misconduct resulting in dismissal.

If you believe that you have suffered discrimination you can raise the matter through our Grievance Procedure. Complaints will be treated in confidence and investigated as appropriate.

You must 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 our Disciplinary Procedure.

15. Policy Review

The Equality, Diversity & Inclusion Policy will be reviewed annually by the Skills Academy Lead, and at other times in the intervening period as necessary. The policy will be published on the HBXL Skills Academy Website and shared with learners via the Learner Handbook.