



## Equality & Diversity Policy

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**Table of Contents**

<b>Policy Purpose</b>	3
<b>Policy Scope</b>	3
<b>Our Principles and Values</b>	3
<b>Key Objectives</b>	4
<b>Roles and Responsibilities</b>	4
Management team and Governors	4
Employees including Apprentices	5
<b>Implementation of our Policy</b>	5
Recruitment and Selection	5
Induction	6
Training and Development	6
Promotion and Progression	7
Succession Planning	7
Multi faith rooms	7
<b>Reporting and Recording Activity</b>	8
<b>Monitoring, Reviewing and Continuous Improvement</b>	8
Governance meetings	8
<b>Our Equality Commitment</b>	9
<b>Contact Details</b>	9
<b>Other information and Useful links</b>	10
<b>Appendix A- Protected Characteristics</b>	11
<b>Appendix B- Types of Discrimination</b>	12

### **Policy Purpose**

The WEC Group values equality & diversity at work and within its workforce and is committed to promoting equality of opportunity for all. We work closely with Blackburn with Darwen Borough Council, South Yorkshire Council and associated partners to promote community harmony and social cohesion within the regions where we are based and work collaboratively to ensure that our learning and employment opportunities are open to all.

Through this policy, the WEC Group will challenge all forms of inequality, discrimination and harassment towards any persons, either directly or indirectly and actively promote working together for social inclusion and job mobility. We particularly look to support cohesion between people of all races, religious backgrounds, ethnicities and gender/non-gender specific (as described in Appendix A) to actively engage in our job and learning opportunities, as well as open communications within the workplace to help build strong, diverse workplace communities.

The purpose of this policy is to facilitate equality & diversity within our workforce and as part of the learning programmes that we provide apprentices at The WEC Group. The WEC Group has a zero-tolerance policy on expressions of opposition to equality, diversity and inclusion in all forms, e.g. discrimination, prejudice, stereotyping, bullying, harassment, cyber-bullying, stalking, intimidation, slavery, etc.

The WEC Group accepts that discrimination can take many forms and can be both direct, indirect and/or by association, however no forms however minor will be tolerated at any time; this policy seeks to ensure strong practice and enforcement around this, as well as effective monitoring and impact of the same. (See Appendix B for examples of different types of discrimination).

The WEC Group will identify and remove barriers which place people at a disadvantage and will actively promote equality for all, as well as celebrate diversity.

All employees including our apprentices will be supported to develop their full potential within a culture reflecting equal status at the WEC Group.

### **Policy Scope**

This policy applies to all of our employees, including our apprentices at work and within all of our learning environments, e.g. The Apprentice Engineering Academy's at Blackburn and Rotherham. This policy also applies to any contracted or supply staff and subcontractors working as part the delivery of our services. This policy encompasses all legislation, regulations, statutory and non-statutory codes of practice that are required contractually and legally, as well as morally and socially to ensure that equality and diversity permeates throughout our business culture.

Any action by an employee including an apprentice which contravenes this policy renders them liable for disciplinary action. Evidence of discrimination or harassment may be considered as gross misconduct and this will be actioned via the appropriate disciplinary policy which can be found on the HR page of the intranet.

### **Our Principles and Values**

The WEC Group is keen to develop an organisational culture that embraces and exceeds the minimum compliance requirements of the law in relation to equality and diversity. The WEC Group strives to be inclusive, an ambassador of equality and embracing of diversity as reflected through



our Company values which are embedded throughout the Company from recruitment stage throughout an employee and learners journey.

- 1) **INTEGRITY**- We will operate ethically, reliably and honestly.
- 2) **EXCELLENCE**- We will exceed expectations and strive to be the best we can.
- 3) **POSITIVITY**- We will bring energy and enthusiasm to both our work and learning whilst being supportive of others, our processes, our customers and the Company.
- 4) **TEAMWORK**- We will work together to be more efficient and productive, resulting in increased innovation, higher morale and improved retention.
- 5) **SAFETY**- We will promote a safety culture within the workplace which is fundamental to operational excellence.

Through this policy, the WEC Group will not only fulfil its statutory duties, it will also develop good practice and champion initiatives such as Women into Welding programme, to attract more females into the welding and engineering sector.

The WEC Group supports the development of shared values that align with the British Values:

- 1) **DEMOCRACY**- Giving everyone a voice of opinion
- 2) **INDIVIDUAL LIBERTY**- Freedom of speech
- 3) **THE RULE OF LAW**- No one is above the law, innocent until proven guilty
- 4) **RESPECT AND TOLERANCE**- Respect for people of all backgrounds, cultures, ages, genders, faiths, sexualities and beliefs

### **Key Objectives**

Through this policy, the WEC Group will:

- Eliminate any form of discrimination, bias, harassment and/or victimisation, whether intentional or unintentional across our business practices and/or processes and within our workplace and learning environments (The Apprentice Engineering Academy's in Blackburn and Rotherham)
- Champion equality of opportunity between all people, across all of our processes and within our operations to ensure fair and consistent access to jobs, learning and progression opportunities (please refer to our Staff Training and Continuous Professional Development Policy)
- Remain compliant with the legislative requirements of the Equality Act 2010

### **Roles and Responsibilities**

#### **Management and Governors**

It is the responsibility of all the Management team and Governors of the WEC Group to:

- Ensure the implementation of this Equality & Diversity policy is an ongoing process and embedded in each working day
- Ensure all staff are aware of the Equality & Diversity Policy during the induction process. The Management team must deliver the information around the policy and our employees and apprentices must listen to and understand the policy
- Ensure that the equality of opportunity will exist for all existing and potential staff in relation to recruitment, development opportunities and promotion

- Ensure that the data collected in relation to recruitment and selection processes, staff training opportunities and staff promotion will be monitored through the governance structure and reviewed during monthly governance meetings
- Ensure that any allegation of discrimination will be investigated thoroughly and action taken if necessary. All allegations are to be reported to the HR department with immediate effect and appropriate disciplinary action may be taken following our disciplinary procedure. (Found on the HR page of the intranet- the link can be found below in 'other information and links') Any investigations that conclude that deliberate effort has been made by any of our employees, including apprentices to discriminate against others intentionally, unintentionally and/or by association may lead to dismissal.
- Ensure that the WEC Group will be proactive in offering employees including apprentices the opportunity to disclose a disability and supporting them to do so. All employees including our apprentices can update any details on protected characteristics confidentially via the HR e-mail address [hr@wecl.co.uk](mailto:hr@wecl.co.uk)
- Ensure that reasonable adjustments will be made for all our employees including our apprentices who are or who become disabled during their period of employment.
- Ensure that relevant training, advice, guidance and support will be provided to ensure that all our employees including apprentices and contractors understand their duties and obligations in law. Training will take place at the Apprentice Engineering Academy's on set training days if required
- Ensure that the WEC Group will protect the confidentiality of disclosed sensitive matters related to equality & diversity, where this does not affect the health and safety of others or does not have criminal implications

### **Employees including Apprentices**

It is the responsibility of all employees including apprentices of the WEC Group to:

- Strictly adhere to this Equality & Diversity Policy in its entirety
- Raise any concerns relating to Equality & Diversity with the HR department

### **Implementation of our Policy**

The WEC Group considers equality & diversity in all its processes: Recruitment and Selection, Training and Development, Promotion and Progression and Succession Planning.

### **Recruitment and Selection**

As an equal-opportunities employer we are fully committed to treating all applicants equally and fairly, with respect and courtesy, aiming to ensure that the candidate experience here at the WEC Group is positive, irrespective of the outcome.

The recruitment process aims to seek and attract the best candidate for the job/ apprenticeship based on merit and ensure the identification of the person best suited for the job/ apprenticeship and the Company.

We seek to employ a workforce which truly represents all sections of society as we value the individual contribution of all our employees/ apprentices irrespective of sex, age, marital status, disability, sexual orientation, gender reassignment, race, colour, religion or belief, ethnic or national origin.



As an employer the WEC Group has a duty to:

- Eliminate unlawful discrimination, harassment and victimisation
- Promote equality of opportunity
- Ensure we pay particular attention to the following specific areas:
  - Job descriptions
  - Job adverts
  - Application forms and CV's- Application forms will be accessible in alternative formats upon request, e.g. in hard copy
  - Short listing by the recruitment team
  - Interviews/ tests/ prior learning assessments/ apprentice taster days
  - Recruiting pregnant women or those on maternity leave
  - Positive action in recruitment

As a Group we partner with organisations in our local community who support the distribution of opportunities in order to reach those who traditionally do not respond to engineering related careers opportunities. To attract a diverse workforce we aim to:

- Work closely with Colleges, Schools, Darwen, Blackburn and Rotherham Jobcentres, advertising on our Group website as well as on the 'find an apprentice' site
- Work closely with our Group Marketing department to ensure we use all social media channels to enable us to reach all individuals.
- Focus on increasing 'Women in Welding' by actively promoting our current female success stories within the company and the Apprentice Engineering Academy.
- Raise awareness of 'stem' careers to parents and careers advisers by:
  - Visiting all the schools and higher education facilities in the local areas
  - Holding open events/ tours at our very own Apprentice Engineering Academy's
- Offer application guidance and communicate a simple application procedure which will be made clear and free from bias, by ensuring that our application is readily available on our website along with relevant contact details for the recruitment team to provide support if required.
- Actively encourage individuals with known disabilities, from ethnic minority backgrounds, of all ages and all abilities to apply for all open vacancies and learning opportunities, whether full time, part time or apprenticeship positions, by doing, for example:
  - Ensuring all marketing material represents our commitment to equality and diversity
  - Promote and advertise our vacancies as an equal opportunities employer
- At application and interview stage all applicants with learning difficulties and/or disabilities are actively encouraged to declare any support requirements before, during and post the application stage and any subsequent stages e.g. Interview and selection processes,
  - To ensure access to sites, amenities and services (reasonable adjustments)
  - To ensure application forms are suitable and if not provide an alternative
  - To ensure correct and thorough advice on all jobs and development opportunities (refer to the staff training and CPD policy) is given

## Induction

WEC Group induction procedures which familiarise all employees including apprentices with the policy and our commitment to equality and diversity will be delivered to all new starters, fulltime and part- time, and off site across the rest of the Group.

## **Training and Development**

All our materials which we use to promote learning and employment opportunities will convey all-inclusive terminology and actively encourage participants from all background to apply within. We ensure that all our materials are free from bias, which celebrate diversity and challenge stereotyping and these are used throughout the curriculum.

Prior learning assessments, undertaken at the recruitment stage, which identify and acknowledge individual learner's starting points and preferred learning styles and which offer a variety of assessment strategies will permeate throughout the delivery of provision here at the WEC Group.

During all training and development sessions we expect the delivery team to be culturally aware and foster good relations and equality for all protected groups. The delivery team will be expected to integrate all cultures into the curriculum and make extra provisions where necessary for literacy, numeracy and language skills. Further training around this will be provided to the delivery team via relevant training courses available.

## **Promotion and Progression**

During our training and development sessions throughout the Group and at the Apprentice Engineering Academy's a dynamic portfolio of relevant programmes will be offered which are responsive to learner needs and enables the learners to study at the appropriate level with good prospects for success and progression.

Progression routes will be clearly published (please refer to our Staff Training and CPD policy and our Career Progression page on the website) and advice given impartially during progress review meetings. We will continue to offer impartial information, advice and careers guidance to ensure the best approach for our employees. Our Career Progression is a 'pave your way to success at WEC Group step by step) which details opportunities open to all our employees including our apprentices. It offers excellent career progression opportunities and allows our employees including our apprentices to become the Engineers they want to be whilst adding value to our overall mission of achieving manufacturing excellence.

## **Succession Planning**

As a company the WEC Group aims to support learners into a sustainable career within the WEC Group. During regular reviews and annual performance meetings we ensure that all our employees including apprentices are on their path to a successful career with us and firm job offer at the end of their apprenticeship.

## **Multi faith room**

The WEC Group will neither promote, nor permit to promote, any one religious faith or culture. All employees including apprentices will be expected to adhere to this Equality & Diversity policy. We expect all our employees including our apprentices to be respectful of all persons, regardless of faith, religion and/or any other protected characteristics.

Whilst the Apprentice Engineering Academy's primary role is the delivery of learning activities including apprenticeships, arrangements will be made, where this is practicable, for staff or students to carry out essential religious observance. A multi-faith space is located on the top floor of the Apprentice Training Academy in Blackburn and a private space at the Academy in Rotherham is a



quiet location set aside where employees, contractors and visitors of differing religious beliefs, or none at all, are able to spend time in contemplation or prayer. These facilities are managed accordingly and monitored to ensure safe use by all.

### **Reporting and Recording Activity**

To improve the diversity of our workforce here at the WEC Group it is important that we measure it, and to successfully do this, we collect and monitor the data as listed below. We collect equality data at various stages including:

- Job applicants
- Interviewees
- Applicants offered
- New starters
- Leavers

This data is collated confidentially and anonymously through our HR department. We use this information to ensure that our employment opportunities are fair and accessible to all.

### **Monitoring, Reviewing and Continuous Improvement**

#### **Governance meetings**

Each quarter the Governance Committee will meet, this will be chaired by the Managing Director who has the overall responsibility for the review of this policy, monitoring its effectiveness and measuring its impact. The effectiveness of the policy will be reviewed through:

- Regular analysis of employee/ apprentice participation, retention, achievement, success and progression by reported protected characteristics
- Regular analysis of the staffing profile in relation to recruitment/ workforce profiling
- Regular analysis of access to professional development opportunities and to promotion for all staff including those with protected characteristics

The Committee will also have a responsibility to review all relevant data which has been collected. Prior to each of the quarterly committee meetings the Group Apprenticeship Coordinator will provide the committee with all the relevant information they need to be able to monitor the Company's position on equality and diversity, this will include:

- The quarterly equality profile of our workforce (including representation at different levels and pay bands)
- Recruitment and promotion data
- Working patterns: numbers of part-time and full-time staff
- Pay gap information (annually reported on for Gender pay gap reporting)
- Access to and take up of learning and development opportunities, including training and education around life in modern Britain and British Values
- Grievances (including about harassment)
- Disciplinary action (including for harassment)
- Dismissals and other reasons for leaving (including exits under settlements, retirements and resignations)
- Sickness absence
- Flexible working patterns



- Pregnancy and maternity leave


The equality information enables the committee to identify and understand potential key equality issues in our workforce including evidence of potential pay gaps. To assess our performance, the committee along with the HR department also benchmark the Company against national statistics released by the Office for National Statistics.

**Our Equality Commitment**

The WEC Group is committed to the promotion of equality & diversity and to providing a supportive environment for all members of our community. Our commitment means that this policy has been reviewed to ensure that it does not discriminate (either intentionally or unintentionally) against any of the protected characteristics of age, disability, gender (including gender identity), race, religion, marriage and civil partnership, pregnancy and maternity or sexual orientation and meets our obligations under the Equality Act 2010. Therefore, this policy has no adverse impact on any of the above protected groups.

**This Equality & Diversity Policy is reviewed annually - additional reviews may be needed in the event of updated legislation or incidents relating to topics in this policy.**

**NEXT REVIEW DATE: 08/11/2024**

SIGNED:  DATE: 8.11.23

**Steve Hartley, Managing Director**

**Contact Details**

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### **Other information and useful links**

#### **Relevant legislation**

The WEC Group Equality & Diversity Policy is based on the Equality Act 2010, and the Equality Act 2010 (Statutory Duties) Regulations 2011. These two legal duties also overarch The WEC Group's statutory duty under the Children and Family Act 2014 as specified in the Special Educational Needs and Disability (SEND) Code of Practice for 0-25 year olds which came into force on the 1<sup>st</sup> September 2014. This SEND Code of Practice relates to children and young people with special educational needs (SEN) and disabled children and young people less than 25 years of age.

Also, Section 26 of the Counter-Terrorism and Security Act 2015 places a duty on certain bodies (including FE/HE institutions), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism."

[disciplinary-procedure-2022.pdf](#)

<https://www.gov.uk/guidance/roatp-application-guidance-digital-may-2021>



## Appendix A - Protected Characteristics

1.1 The *protected characteristics* contained in the Equality Act are:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

Each *protected characteristic* is defined below.

**1.2 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.

**1.3 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.

**1.4 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.

**1.5 Marriage and civil partnership:** Marriage covers 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.

**1.6 Pregnancy and maternity:** The WEC Group will not treat a woman unfavourably because of her pregnancy or related illness, or because she is on maternity leave or seeking to take maternity leave. The WEC Group will not discriminate against an employee because of their association with a woman who is pregnant or who has recently given birth.

**1.7 Race:** The WEC Group will not discriminate against any employee because of his/her colour, nationality or ethnic or national origins.

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

**1.9 Sex:** The WEC Group will not discriminate against any employee because of their sex.

1.10 *Sexual orientation*: The WEC Group will not discriminate against employees because of their Sexual orientation, regardless of whether that's towards:

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

## **Appendix B - 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.

1.1 *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 must be objectively justified.

1.2 *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.

1.3 *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.

1.4 *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.

1.5 *Discrimination by perception*: is direct discrimination against an employee because he/she is mistakenly believed to have a protected characteristic (not including marital or civil partnership status).

1.6 *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. An individual does not necessarily have to be the victim of the unwanted behaviour in order to feel harassed by it.

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

1.8 Giving '*due regard*' to reasonable adjustments: reasonable adjustments are 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.

1.9 *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.