



INITIATIVE
TRAINING GROUP

Equality, Diversity and Inclusion Policy

The Initiative Training GP Limited

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Final draft for Director approval



Document control

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Applies to	Workers, applicants, learners, customers, contractors, consultants, suppliers, partners and visitors

Version history

Version	Date	Status	Summary of change
1.0	16 July 2020	Issued	Initial Equality and Diversity Policy.
2.0	23 July 2026	Draft	Comprehensive update to scope, legal terminology, reasonable adjustments, harassment prevention, complaints, data protection and monitoring.

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1. Purpose

1.1 The Initiative Training GP Limited (ITG) is committed to providing working, learning and service environments in which people are treated fairly, with dignity and respect. We value individual difference and seek to remove avoidable barriers to participation, achievement and progression.

1.2 This policy sets the standards that ITG will apply to equality, diversity and inclusion in employment, recruitment, contracting, training, consultancy, customer service and business relationships. Its objectives are to prevent unlawful discrimination, harassment and victimisation; promote fair access and participation; provide reasonable adjustments; and deal with concerns promptly and fairly.

1.3 This policy is based primarily on the law applying in England, Scotland and Wales. Where ITG operates in Northern Ireland or overseas, relevant local legal and contractual requirements will also be considered. Where local requirements provide a higher standard, that higher standard will be followed where lawful and practicable.

2. Scope

2.1 This policy applies to:

- employees, workers, agency workers, consultants, contractors, volunteers, Directors and job applicants;
- actual and prospective learners, delegates, customers and service users;
- suppliers, subcontractors, business partners, client representatives and visitors; and
- any person representing ITG or participating in an ITG activity.

2.2 It applies at ITG premises, client and supplier locations, training venues, online platforms, during business travel, at work-related social events and in all work-related communications, including email, messaging, video calls and social media.

2.3 Suppliers and subcontractors are expected to maintain standards consistent with this policy. Their own arrangements may be used where they provide equivalent or stronger protection, but ITG will not contract out of its own responsibilities.

2.4 This policy should be read alongside relevant recruitment, complaints, grievance, disciplinary, safeguarding, data protection, health and safety and dignity-at-work arrangements, where applicable.

3. Legal framework and protected characteristics

3.1 ITG will comply with the Equality Act 2010, as amended, and other applicable employment, education, services and data protection law. This includes the preventative duty relating to sexual harassment and the handling of equality monitoring information under the UK General Data Protection Regulation, the Data Protection Act 2018 and the Data (Use and Access) Act 2025.

3.2 The nine protected characteristics under the Equality Act 2010 are:

- age;
- disability;
- gender reassignment;
- marriage and civil partnership;
- pregnancy and maternity;
- race, including colour, nationality and ethnic or national origins;
- religion or belief;
- sex; and
- sexual orientation.

3.3 ITG prohibits unlawful direct discrimination, indirect discrimination, discrimination arising from disability, failure to make reasonable adjustments, harassment, sexual harassment and victimisation. Protection may also apply where treatment is based on a perception that someone has a protected characteristic or their association with another person.



3.4 ITG also seeks to prevent unfair treatment connected with factors that may not, by themselves, be protected characteristics. These include caring responsibilities, working pattern, socioeconomic background, neurodiversity, health status, accent, appearance, education, military or civilian background and employment status.

3.5 Lawful and proportionate positive action may be considered where evidence shows disadvantage, under-representation or different needs. Unlawful positive discrimination will not be used.

4. Our commitments

4.1 ITG will:

- make employment, contracting, learning and service decisions using fair, objective and relevant criteria;
- provide equal access to opportunities and remove avoidable barriers;
- make reasonable adjustments for disabled people and consider individual support needs;
- maintain clear standards of conduct and challenge discrimination, harassment, bullying and exclusion;
- take proactive steps to assess and reduce the risk of sexual harassment and other unlawful harassment;
- provide safe and accessible ways to raise concerns and protect people from victimisation;
- use inclusive and accessible language, imagery, learning materials and digital systems;
- work only with suppliers and partners that can meet appropriate equality and conduct standards; and
- monitor the effectiveness of this policy proportionately and improve it when evidence identifies a gap.

Principle: Fair treatment does not always mean identical treatment. Different arrangements may be necessary to remove disadvantage or meet a legitimate individual need.

5. Recruitment, engagement and access to learning and services

5.1 Recruitment, selection, promotion, allocation of work, access to training and admission to learning will be based on role or programme requirements, capability, experience, conduct and other objectively relevant factors.

5.2 Vacancy notices, role descriptions and selection criteria will be clear, proportionate and free from unjustified barriers. Recruitment will be conducted consistently, with records sufficient to explain decisions. Where practicable, more than one person will be involved in shortlisting or selection for significant appointments.

5.3 Applicants, workers and learners will be told how to request a reasonable adjustment. ITG will not ask unnecessary questions about disability or health before an offer or admission decision, except where permitted by law, for example to arrange an adjustment, assess an essential function or meet a specific legal requirement.

5.4 Learning and services will be designed and delivered to be accessible as far as reasonably practicable. This may include accessible venues, captions or transcripts, alternative formats, adapted assessment methods, additional time, rest breaks, remote participation or suitable specialist support.

5.5 Equality monitoring information will not be used to make individual selection decisions and will be separated from decision-makers wherever practicable.

5.6 ITG will not advertise or claim membership of an equality or disability accreditation scheme unless that membership is current and the relevant commitments are being met.



6. Disability, health, neurodiversity and reasonable adjustments

6.1 People will be given appropriate opportunities to tell ITG, in confidence, about a disability, health condition, neurodivergence, learning difficulty or other barrier for which support or an adjustment may be needed. Disclosure is voluntary, although ITG can only act on needs it knows or could reasonably be expected to know about.

6.2 ITG will discuss needs with the individual and avoid assumptions. Medical evidence will be requested only where it is necessary and proportionate. A diagnosis will not automatically be required where the practical need and adjustment are clear.

6.3 Reasonable adjustments may include changes to working arrangements, duties, communication methods, equipment, premises, travel, learning materials, timetables, assessment arrangements or support. Adjustments will be reviewed where circumstances, roles or programmes change.

6.4 Information about disability, health or support needs will be shared only with those who need it to arrange support, meet a legal obligation or manage safety. Wherever possible, the individual will be told what information needs to be shared and why.

6.5 If a requested adjustment cannot reasonably be provided, ITG will explain the reasons and consider effective alternatives with the individual.

7. Standards of behaviour and an inclusive environment

7.1 Everyone covered by this policy is expected to communicate and behave with professionalism, courtesy and respect. Difference of opinion is permitted; personal abuse, discriminatory conduct and conduct that undermines another person's dignity are not.

7.2 Unacceptable conduct may include:

- derogatory remarks, jokes, images, gestures, mimicry, nicknames or so-called banter;
- stereotyping, exclusion, intimidation, unwanted personal comments or intrusive questioning;
- misuse of authority, influence or seniority;
- unwanted physical contact or invasion of personal space;
- displaying, sending or sharing offensive or sexual material;
- online harassment, including through personal devices or accounts where there is a work connection;
- pressuring a person to discuss or disclose a protected characteristic, health condition or personal history; and
- retaliating against someone who raises a concern, supports a complaint or participates in an investigation.

7.3 A person's intention is relevant but is not decisive. Conduct can be unacceptable or unlawful because of its purpose or its effect. Repeated conduct is not required; a single serious incident may be sufficient.

7.4 ITG will consider the needs of individuals and the wider group when designing learning and working environments. Where rights or needs appear to conflict, ITG will assess the facts carefully, act lawfully and seek a proportionate solution rather than relying on assumptions or inconsistent treatment.

8. Preventing harassment and sexual harassment

8.1 Harassment is unwanted conduct related to a protected characteristic that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.

8.2 Sexual harassment is unwanted conduct of a sexual nature with that purpose or effect. It also includes less favourable treatment because a person rejected or submitted to unwanted sexual conduct or conduct related to sex or gender reassignment.



8.3 ITG will take all reasonable and proportionate steps to prevent sexual harassment and other unlawful harassment. This includes conduct by workers, learners, customers, clients, suppliers and other third parties.

8.4 Preventative action will be proportionate to ITG's activities and may include:

- periodic risk assessment, including risks arising from business travel, overnight stays, lone working, client sites, training environments, alcohol, social events, online communications and power imbalances;
- clear behavioural standards in contracts, joining instructions, induction and event information;
- role-appropriate training for workers, managers and those receiving complaints;
- accessible reporting routes and prompt action when concerns or warning signs are identified;
- controls for higher-risk activities, including supervision, buddy arrangements, contact plans or restrictions on access where appropriate;
- reviewing previous incidents, near misses and feedback for patterns; and
- taking action against third parties, which may include a warning, removal from an activity, access restrictions, contract action or referral to the police or another authority.

8.5 A person is encouraged to report both incidents and situations in which they felt at risk, even where no incident occurred. Early information can allow ITG to prevent harm, strengthen controls and support those affected.

9. Raising concerns and complaints

9.1 Anyone who experiences, witnesses or becomes aware of possible discrimination, harassment, bullying, victimisation or exclusion should raise the matter as soon as reasonably practicable. Concerns may be raised with a Director, the relevant project or training lead, or through the applicable complaints or grievance procedure.

9.2 Where the concern involves a Director or the normal reporting route is unsuitable, the matter may be raised with the other Director or an independent adviser appointed for that purpose.

9.3 Depending on the circumstances, a concern may be addressed informally or formally. No person will be required to confront the subject of a complaint directly. Serious allegations will normally require a formal response.

9.4 ITG will:

- listen without pre-judging the outcome;
- take immediate protective or welfare measures where necessary;
- explain the process and likely timescales;
- investigate fairly, impartially and with appropriate independence;
- give relevant people a reasonable opportunity to respond;
- maintain confidentiality as far as possible, while recognising that information may need to be shared for a fair investigation or legal obligation;
- keep appropriate records; and
- communicate the outcome to the extent that it is lawful and appropriate to do so.

9.5 No person will be disadvantaged for raising a concern in good faith, supporting another person or participating in an investigation. A complaint that is not upheld will not, by itself, be treated as false or malicious. Deliberately fabricated allegations may be dealt with under the appropriate conduct procedure.

9.6 Where conduct may be criminal, create an immediate safety risk or engage safeguarding duties, ITG may contact the police, emergency services, a safeguarding authority, a client or another appropriate body.

10. Monitoring and personal data

10.1 ITG may collect and analyse proportionate information about participation, applications, outcomes, complaints, satisfaction and adjustments to identify barriers, under-representation, recurring risks or unequal outcomes.



10.2 Equality monitoring information may include special category personal data. ITG will collect it only for a defined purpose and lawful basis, provide appropriate privacy information, limit access, maintain security, keep it only as long as necessary and use aggregated or anonymised information wherever practicable.

10.3 Providing equality monitoring information will normally be voluntary. A decision not to provide it will not result in disadvantage. Monitoring questions will be kept separate from selection, assessment or allocation decisions wherever practicable.

10.4 Information about complaints or adjustments will not be used for unrelated purposes. It may be retained where necessary to meet legal obligations, establish or defend legal claims, identify patterns or demonstrate that ITG took appropriate action.

10.5 Any supplier processing equality or health information for ITG must have suitable confidentiality, security, retention and data protection arrangements.

11. Roles and responsibilities

11.1 Directors

- approve this policy and demonstrate leadership through decisions and conduct;
- ensure proportionate resources, reporting routes and preventative measures are in place;
- consider equality implications in significant business, service and workforce decisions;
- ensure serious concerns are handled with suitable independence; and
- review policy effectiveness and legal developments.

11.2 Managers, project leads and trainers

- apply this policy consistently and fairly;
- identify and reduce foreseeable risks, including harassment risks;
- respond promptly to requests for adjustments and support;
- challenge inappropriate conduct and escalate concerns; and
- maintain appropriate records and confidentiality.

11.3 All workers and representatives

- treat others with dignity and respect;
- complete required induction or training;
- cooperate with reasonable adjustments and investigations;
- report serious or repeated concerns rather than ignoring them; and
- take responsibility for their own conduct, including online and at third-party locations.

11.4 Learners, customers, suppliers and partners

- meet the behavioural standards set out in this policy and any relevant contract or joining instruction;
- tell ITG about support or access needs in sufficient time where possible;
- cooperate with safety, access and investigation arrangements; and
- ensure their own staff and representatives do not undermine ITG's equality commitments.

12. Breaches and outcomes

12.1 A breach of this policy may result in disciplinary action, removal from a learning activity or site, withdrawal of services, restriction of access, termination of a contract or business relationship, or referral to an appropriate authority. The action taken will depend on the facts, seriousness, risk, contractual position and applicable procedure.

12.2 ITG may also take corrective action even where misconduct is not established, for example by improving supervision, adjusting a process, clarifying standards, providing training or changing a risk control.



13. Communication, training and review

13.1 This policy will be made available to workers, learners, contractors and relevant business partners. Key standards will be communicated through recruitment materials, contracts, induction, joining instructions, training, project briefings or supplier onboarding as appropriate.

13.2 Training will be proportionate to role and risk. People with management, recruitment, training, safeguarding, complaint-handling or supervisory responsibilities will receive additional guidance where necessary. Refresher training will be provided periodically and after material legal or operational changes.

13.3 The Directors will review this policy at least annually and sooner following a serious incident, identified control failure, significant complaint pattern, material change to ITG's activities or a relevant change in law or official guidance.

13.4 The next scheduled review is July 2027. Because employment law continues to evolve, the policy will also be checked against changes due to take effect before that date and amended where required.

Reference framework

- Equality Act 2010, as amended;
- Worker Protection (Amendment of Equality Act 2010) Act 2023;
- Employment Rights Act 2025, as relevant provisions come into force;
- UK General Data Protection Regulation and Data Protection Act 2018, as amended by the Data (Use and Access) Act 2025;
- Acas Code of Practice on Disciplinary and Grievance Procedures; and
- relevant Equality and Human Rights Commission, Acas and Information Commissioner guidance.

Approval

Approved by: _____	Date: _____	Signature: _____
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