

Juniper



TRAINING

Equality, Diversity and Inclusion Policy

November 2025

This policy will be updated as our business changes and in line with new legislation. It will be reviewed and updated as necessary, a minimum of once a year. Where you see reference to the term 'student' in this policy, this applies to all 16-19 study programme students, students on traineeships and apprentices.

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Plan Owners	Triona O'Donnell Student Support Manager	Tara Hughes Director of Quality	
Governance Sign Off Date			
CEO Signed		CEO Print	
Date policy signed off by CEO			

Contents Page

	Page No.
1.0 Equality, Diversity and Inclusion Policy	3
1.1 Introduction	
1.2 Purpose of the Policy	
1.3 Monitoring and Review of the Policy	
1.4 Juniper's Aim	
1.5 Responsibilities	
1.6 Teaching and Learning	
2.0 Meeting the Needs of Students and Staff	5
2.1 Equality Act 2010	
2.2 Race Equality	
2.3 Sex Equality	
2.4 Disability Equality	
2.5 Sexual Orientation Equality	
2.6 Gender Reassignment Equality	
2.7 Age Equality	
2.8 Religion or Belief Equality	
2.9 Pregnancy and Maternity Equality	
2.10 Marriage and Civil Partnership Equality	
3.0 Employment Practices	8
3.1 Recruitment and Selection	
3.2 Training and Development	
3.3 Equality Training	
3.4 Promotion within Juniper	
3.5 Discipline and Grievance	
3.6 Equal Pay	
3.7 Part Time and Flexible Working Arrangements	
3.8 Student Recruitment	
Annex 1 Glossary of Terms	10
Annex 2 Types of Discrimination	11
Annex 3 Overview of Acts	12
Annex 4 Website links for further information	14

1.0 Equality, Diversity and Inclusion Policy

1.1 Introduction

Juniper's Equality, Diversity and Inclusion Policy describes how the company will fulfil its statutory duties to promote equality of opportunity for all its staff and stakeholders.

We will comply with the law in promoting equality and reaching groups of people with low skills, improving access to learning and students' experience in training. We will seek to increase participation amongst students by offering inclusion for students from the widest possible pool, ensuring that all students succeed and can progress in ways that match their abilities and aspirations.

We have developed our procedures and practices which do not discriminate on the ground of grounds of sex; marriage and civil partnership; gender reassignment; pregnancy and maternity; race (including ethnic origin, colour, nationality and national origin); disability; sexual orientation; religion or belief and age. We encourage diversity and our aim is to have representation of all sections of society working within Juniper.

1.2 Purpose of the Policy

The purpose of this policy is to provide equality and fairness for our staff, students, employers, subcontractors and stakeholders. To create an environment in which individual differences and contributions of our staff are recognised and valued without intimidation.

Breaches of our Equality, Diversity and Inclusion Policy will be regarded as misconduct and could lead to disciplinary proceedings.

This document will detail how Juniper will approach the nine protected characteristics and a brief overview of the relevant Acts can be found in Annex 3 of this policy. Further activities regarding any areas for development are detailed in each centre's own quality improvement plan and in Juniper's overall Quality Improvement Plan.

1.3 Monitoring and Review of the Policy

The Equality, Diversity and Inclusion Policy has the commitment from the Senior Management Team and overall day-to-day responsibility of the scheme lies with the CEO.

Juniper aims to promote a culture of respect and dignity of all staff and students through effective implementation of policies and procedures.

They will take into account the policy in the development of the Strategic Plan and use management information data, including an annual EDIM Report (Equality, Diversity and Impact Measures). This enables Juniper to promote equality and diversity; monitor progress against targets and ensure an inclusive environment for all.

The Director of Foundation Learning, The Director of Apprenticeships and the Apprenticeship Contract Manager will take responsibility for setting and agreeing

actions to achieve targets with Performance Managers and Apprenticeship Sector Leads.

The Director of Quality and Student Support Manager will review the policy on a twelve-month cycle to ensure that it is updated appropriately in line with current legislation and practices.

1.4 Juniper's Aim

Juniper is wholly committed to achieving equality for all students and staff; always ensuring diversity is valued. As an educational provider Juniper has produced an Equality, Diversity and Inclusion Policy which aims to avoid discrimination in accordance with the nine protected characteristics:

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

We aim to engage all staff, students, employers, subcontractors, and stakeholders to provide engaging, creative and challenging provision, which will reflect diversity, promote inclusion and embed equality for all. By recruiting staff from the widest pool possible we aspire to generate insight into different cultures and communities, providing an inclusive environment for all staff, students and stakeholders.

Equality and diversity are an integral part of our business strategy. We will ensure that the working environment of our staff, students, employers, subcontractors and stakeholders is free from discrimination, harassment and bullying; and we seek to promote positive and inclusive practices. Juniper recognises that microaggressions—subtle, often unintentional behaviours or comments that marginalise individuals—can have a significant impact on wellbeing and inclusion. Our organisation is committed to raising awareness of microaggressions, encouraging respectful communication, and fostering a culture where all learners and staff feel safe, valued, and respected.

1.5 Responsibilities

CEO

Has overall and final responsibility for discriminatory acts within Juniper, our sub-contractors and stakeholders, along with overall responsibility for managing recruitment processes and staff training.

Management Board/Governors

Reviews the policy annually.

Director of Quality & Student Support Manager

Reviews and updates the policy annually in line with current legislation and practices.

Quality Team

Provision reviews are conducted by the Head of Quality and the Quality Team. The provision reviews validate centres' individual self-assessment reports and Quality Improvement Plans against Ofsted's Education Inspection Framework (EIF) criteria of which equality, diversity & inclusion forms part of the process.

Human Resources Team

Will monitor personnel procedures, to include recruitment and selection, promotion, training, disciplinary and grievance.

1.6 Teaching and Learning

Juniper promotes social inclusion in all its training programmes and provision types. Students are introduced to equality and diversity from the very start of their learning programmes, and it is fully embedded within each pathway, provision type and apprenticeship standard. This is part of our ongoing strategy to promote the key characteristics and ensure that all students have an understanding of their rights and responsibilities.

All students receive impartial advice and guidance which is unbiased and non-discriminatory. Individual student needs are diagnosed through a robust initial assessment process and access to specialist support is available, if required.

Juniper's procedures and practices do not discriminate on the grounds of sex; marriage and civil partnership; gender reassignment; pregnancy and maternity; race (including ethnic origin, colour, nationality and national origin); disability; sexual orientation; religion or belief and age.

2.0 Meeting the Needs of Students and Staff

2.1 Equality Act 2010

The Equality Act 2010 protects people from discrimination in the workplace. The act replaced previous anti-discrimination laws with a single act and sets out ways in which it's unlawful to treat someone. Juniper's Equality, Diversity and Inclusion performance is reviewed by the Governors, Management Board, Director of Quality, Director of Foundation Learning, Director of Apprenticeships, Apprenticeship Contract Manager, Performance Managers, Student Support Manager and all staff throughout the company on an ongoing basis.

Juniper will seek to review all publicity materials to ensure that there are no negative images and references to any of the nine protected characteristics. Barriers will be removed that might prevent applications from potential employees and students based on any of the nine protected characteristics.

Entry to programmes and apprenticeships will be based on eligibility criteria of which academic ability may be one; certain abilities are necessary for the level of

programmes offered at Juniper. This will be considered when discussing suitability with applicants. Likewise, Juniper will consider the ability of staff applicants and their ability to fulfil the job role. This is reflected with employers and Juniper staff ensure that employers we work with abide by and follow the same non-discriminatory and inclusive practices. Person Specifications for both Juniper staff and students will quantify the ability required for staff and exclude applicants who have not gained the relevant experience.

Staff receive comprehensive induction training and ongoing CPD training to ensure that they are well equipped and have the knowledge required to implement this policy. This is documented on their CPD records and in staff personal development plans.

2.2 Race Equality

Juniper welcomes staff, students, employers, subcontractors and stakeholders from all ethnic backgrounds irrespective of race which includes; colour, nationality and ethnic or national origin. We recognise the diversity of the community we serve and aim to treat everyone as an individual. Diversity amongst Juniper service users is seen as a positive experience and we encourage contribution from all groups.

Juniper promotes opportunity for staff, students, employers, subcontractors and stakeholders regardless of race or ethnic origin. Juniper will eliminate unlawful racial discrimination, promote equal opportunities and promote good relations between people from different 'racial groups'.

2.3 Sex Equality

Juniper is committed to working to eliminate sex inequality and harassment and promote equality of opportunity for all regardless of sex.

Juniper will eliminate any unlawful discrimination and harassment on the grounds of sex. Equality of opportunity between men and women will be actively promoted amongst staff and students. Information will be collected from employees, service users and others on the effect of the Equality, Diversity and Inclusion Policy and the extent to which it promotes equality between all groups.

Juniper seeks to treat its staff equally regardless of sex. It will respond to issues relating to job evaluation, maternity and paternity, pay or promotion equality and will investigate its practices should they be the subject of enquiry.

Juniper will also seek to adopt systems that allow for career development of staff. We adopt a performance management scheme that bases judgement of financial worth on the work carried out as against the sex of the person carrying out the function.

2.4 Disability Equality

Juniper welcomes disabled students and aims to provide to the best of our ability support which allows them to achieve their potential. We place great emphasis on education and training and support the view of inclusion and supporting ways of incorporating staff and students into its community by facilitating access. All

reasonable anticipatory measures are made to ensure staff and students with disabilities are not treated less favourably as a result of impairment.

Juniper will promote equality of opportunity between disabled staff and students. All unlawful discrimination will be eliminated and positive attitudes towards disabled staff and students will be promoted.

Particular support is offered by Juniper to students to enable access to:

- Dedicated pastoral support
- Local Authority Young People Advisors (e.g. Connexions, Future Focus etc.) and Job Centre Personal Advisors
- Links with local support agencies
- Specialist advice and guidance during the application and interview
- One to one support
- Arrangement for examination access arrangements and special considerations
- Reasonable adjustments implemented in End Point Assessments for Apprenticeships

Juniper will provide support for students with SEND including dyslexia, dyscalculia, dyspraxia, autism spectrum condition and ADHD. Juniper can provide advisors able to refer/signpost students for advice and support with sensory impairment, physical disabilities, learning difficulties, medical conditions and mental health conditions.

The Maths and English Policy forms part of Juniper's commitment to an inclusive learning culture. It outlines students' entitlement, support and services as part of a 'whole organisational approach' to raise aspirations and help students to realise their potential and obtain sustained further education, apprenticeship and employment with training opportunities. It forms part of Juniper's overall Strategic Plan.

2.5 Sexual Orientation Equality

Juniper welcomes applications from staff and students irrespective of sexual orientation (including heterosexual, gay, lesbian, bi-sexual or queer/questioning). Everyone is regarded as an individual and Juniper recognises the contribution an individual makes. Juniper fosters a culture of acceptance and belonging, ensuring that all learners, staff, and stakeholders feel safe and valued regardless of their orientation. We also encourage open dialogue and education to challenge stereotypes and promote understanding across our community.

2.6 Gender Reassignment Equality

Juniper welcomes applications from staff and students who have had proposed, started or completed re-assignment of gender (through surgery and recognised in law as a new gender not registered at birth) or gender reference (individuals choosing to live under a gender different than biologically recognised). We actively work to ensure that all learners, staff, and stakeholders are treated with dignity and respect regardless of their gender identity or transition status. Discrimination, harassment, or victimisation on the basis of gender reassignment is not tolerated.

2.7 Age Equality

Juniper will not discriminate against any individual on the basis of age. Criteria relating to suitability will be based on appropriate skills to undertake particular employment. Juniper will negotiate with staff an appropriate time for retirement; everyone is regarded as an individual and recognised for the contribution they bring to the diversity of the company. Age will not be a determining factor in our selection process or in any other employment practice.

2.8 Religion or Belief Equality

Juniper welcomes staff and student applicants regardless of religion or belief. Everyone is regarded as an individual and Juniper recognises the contribution they make to the diversity of the company. It will not knowingly give preferential treatment to any particular faith group and will endeavour to provide reasonable support to staff and students in carrying out their religious practices such as providing a quiet room for prayer and recognise main religious festivals that directly affect the individual.

Juniper aims to create an environment where all beliefs are recognised, and awareness promoted. By creating an inclusive culture with positive perceptions encouraged the diversity and breadth of the community will be celebrated.

2.9 Pregnancy and Maternity Equality

Juniper will not discriminate against an employee, student or individual on the basis of pregnancy and maternity. Pregnancy or maternity will not be a determining factor in our selection process or in any other employment practice. Juniper will not knowingly discriminate or treat someone unfavourably because of her pregnancy or maternity.

2.10 Marriage and Civil Partnership Equality

Juniper welcomes applications from staff and students irrespective of marital status and civil partnership. Everyone is regarded as an individual and Juniper recognises the contribution an individual makes.

3.0 Employment Practices

3.1 Recruitment and Selection

When recruiting and selecting staff, Juniper ensures that job vacancies are advertised to reach all sectors of the community. Job descriptions and person specifications give a realistic picture of the job which is precise and in a non-discriminating language.

Recruitment publicity avoids stereotyping and reasonable adjustment will be made to comply with the Equality Act 2010. Eligibility of candidates will be validated in accordance with the Asylum and Immigration Act 1996 and the Immigration Act 2016.

Recruitment monitoring information will be removed from the application form and not included when short listing potential staff.

Staff will be selected on the merits of their application form, qualifications, skills and experience. Interviews will usually be conducted by more than one person, which will be unbiased and non-discriminating regardless of sex; marriage and civil partnership; gender re-assignment; pregnancy and maternity; race (including ethnic origin, colour, nationality and national origin), disability; sexual orientation; religion or belief and age. All recruitment and selection practise adhere to the organisations policy for Safeguarding (see Juniper's Safeguarding & Prevent Policy for further guidance).

Unsuccessful candidates will be informed and be provided with feedback on their application form and performance at interview if they ask for it.

3.2 Training and Development

All new staff whether full or part time will receive a structured induction that includes company rules and procedures, roles and responsibilities, this induction will also include training sessions on Safeguarding and Prevent, British Values, Equality and Diversity, Health & Safety and SEND delivered by an appropriately trained member of staff. Staff receive regular refresher training for Safeguarding and Prevent, in line with regulatory guidelines. The annual cycle of staff performance plans identifies the need for staff training and or support.

All staff and subcontractors will have access to scheduled internal training. Regular individual centre team meetings maintain currency on issues; this includes equality, diversity and inclusion.

External training will be made available to staff if deemed necessary to maintain skills and knowledge in order to conduct their job role.

3.3 Equality Training

Training commences during induction where staff are directed to the Equality, Diversity and Inclusion Policy. This is monitored through the Initial Induction Plan, issued to all new staff commencing with Juniper.

3.4 Promotion within Juniper

Selection for promotion will be advertised following the same procedure as for recruitment. Full and part-time staff will have equal access to promotion opportunities.

3.5 Discipline and Grievance

Staff breaching the Equality, Diversity and Inclusion Policy will be dealt with through Juniper's disciplinary and grievance procedures.

3.6 Equal Pay

In accordance with Juniper's terms and conditions of employment, full and part-time employees are entitled to equal and fair pay for work which is of equal value, skill and effort.

3.7 Part Time and Flexible Working Arrangements

Juniper will endeavour to be flexible wherever possible. In line with legislation, certain staff have the right to request flexible working which will be considered in line with business requirements; additionally, we consider requests for flexible working for all staff. Part-time and flexible working will be available regardless of sex.

3.8 Student Recruitment

Juniper will endeavour to recruit students of all sexes, from all ethnic groups and students with special educational needs and disabilities, without prejudice. When recruiting and selecting students, Juniper ensures that training programmes are advertised to reach all sectors of the community. Marketing materials give a realistic picture of the training programmes in non-discriminatory language.

Recruitment publicity avoids stereotyping and reasonable adjustments will be made to comply with the Equality Act 2010. Eligibility of candidates will be validated in accordance with the Asylum and Immigration Act 1996 and the Immigration Act 2016.

All staff involved in the recruitment process work to the Matrix Standards and have received training in information, advice and guidance practice.

[Annex 1:](#)

Glossary of Terms

Disability

A disabled person is described in the Equality Act 2010 as one who has a physical or mental impairment that has a 'substantial' and 'long term' adverse effect on his or her ability to do normal daily activities.

Diversity

Diversity is about recognising, valuing and taking account of people's different backgrounds, knowledge, skills, and experiences, encouraging and using those differences to create a productive and effective workforce.

Ethnicity

A strict definition of ethnic group is a group regarded as a distinct community by virtue of certain essential characteristics, e.g. a shared history which distinguishes it from other groups and a cultural tradition of its own. It has come to have a broader meaning and the expression 'ethnic monitoring' is used in reference to groups defined by colour, race or national origin as well.

Inclusion

Inclusion means creating a learning environment where everyone feels welcomed, respected, and able to participate fully. It involves removing barriers and embracing diversity so that all individuals can thrive.

Gender reassignment

Gender re-assignment is a process undertaken under medical supervision for the purposes of reassigning a person's sex by changing physical or other characteristics of sex. The Sex Discrimination Act was extended in 1999 to make it unlawful to discriminate in employment on the grounds of an employee intending to, undergo or having undergone gender re-assignment.

Liability

Employers have a legal liability for any act of discrimination (including harassment) carried out by their employees unless the employer can show that they have taken all reasonably practicable steps to prevent it.

Office for Standards in Education

Ofsted will inspect training providers as part of the Education Inspection Framework. Inspectors will assess the extent to which the provider complies with the relevant legal duties as set out in the Equality Act 2010.

Safeguarding

The law requires organisations serving students under 18 years and vulnerable adults to keep them safe from danger, harm or abuse. These responsibilities, commonly known as 'safeguarding', are extended to further education and skills providers in respect of vulnerable adults that are training with us. Therefore, all safeguarding requirements are intended to cover all students in learning with Juniper. Please refer to Juniper's Safeguarding Policy for further guidance

[Annex 2:](#)

Types of Discrimination

Direct discrimination

Direct discrimination occurs when someone is treated less favourably than another person because of a protected characteristic that they have or are thought to have.

Discrimination by association

An individual is treated less favourably because they associate with another person who possesses a protected characteristic.

Perception discrimination

This is direct discrimination against an individual because others think they possess a particular protected characteristic. It applies even if the person does not actually possess that characteristic.

Indirect discrimination

Occurs where the effect of certain requirements, conditions or practices imposed by an employer has an adverse impact on people who share the same characteristic. Indirect discrimination generally occurs when a rule or condition, which is applied equally to everyone, can be met by a considerably smaller proportion of people from a particular group, the rule is to their disadvantage, and it cannot be justified.

Harassment

Behaviour which is unwelcome or unacceptable and which results in the creation of a stressful or intimidating environment for the victim amounts to harassment. It can consist of verbal abuse, racist jokes, insensitive comments, leering, physical contact, unwanted sexual advances, ridicule or isolation.

Victimisation

If a person has made or is making an accusation of discrimination in good faith, it is unlawful to discriminate against them for having done so, or because they intend to do so or it is suspected that they intend to do so.

Microaggressions

Microaggressions are subtle, often unintentional comments, actions, or behaviours that communicate bias or exclusion toward individuals based on aspects of their identity, such as race, gender, sexual orientation, disability, or religion. Though often indirect, microaggressions can negatively impact wellbeing, sense of belonging, and inclusion in the learning and working environment.

Annex 3:

Overview of Acts

The Equality Act 2010

The Equality Act 2010 legally protects people from discrimination in the workplace and in wider society. The act replaced previous anti-discrimination laws with a single Act, making the law easier to understand. The act identifies nine characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation which are protected and outlaws discrimination against these characteristics. Prior to the Act there were several pieces of legislation to cover discrimination, including:

- Sex Discrimination Act 1975
- Race Relations Act 1976
- Disability Discrimination Act 1995 & 2005
- Equal Pay Act 1976

Ethnicity and Race

The **Race Relations Act 1976** was superseded by the **Equality Act 2010**.

The **Human Rights Act 1998** provides for the prohibition of discrimination in employment under the European Convention on Human Rights which underpins the Data Protection Act and guarantees freedom of expression.

Sex

The **Sex Discrimination Act 1975** was superseded by the **Equality Act 2010**.

Disability

The **Disability Discrimination Act** was superseded by the **Equality Act 2010**.

The **Disability Discrimination Act 1995** was superseded by the Equality Act 2010.

The **Special Educational Needs and Disability Code of Practice: 0 to 25 years**. The code of practice requires post-16 institutions to:

- Co-operate with the local authority on arrangements for children and young people with SEN.
- The duty to admit a young person if the institution is named in an Education Health and Care (EHC) Plan.
- The duty to have regard to this Code of Practice
- The duty to use their best endeavours to secure the special educational provision that the young person needs.

Human Rights Act 1998 covers your rights under European Convention on Human Rights. If you experience discrimination on the grounds of disability, you may have a case under both the Human Rights Act and the Equality Act.

Learning and Skills Act 2000 – gives the Funding Bodies the power to attach conditions to payments it makes to training providers. Training providers must demonstrate due regard and promote equality, diversity and inclusion between the following groups:

- Persons of different racial groups
- Male and female
- Persons who are disabled and persons who are not.

Providers are required to publish a statement on their arrangements and effectiveness of promoting equality, diversity and inclusion.

Sexual Orientation

The **Employment Equality (Sexual Orientation) Regulations 2003** was superseded by the **Equality Act 2010**.

The **Employment Equality (Sexual Orientation) Regulations 2003** outlaws discrimination on grounds of sexual orientation in employment and vocational training. It covers all aspects of employment relationship, recruitment, pay, working conditions, training, promotion, dismissal and references. It covers orientations towards people of the same sex, people of the opposite people sex, or people of both sexes. This means that it protects lesbian, gay, bisexuals, queer/questioning and heterosexuals in employment and training.

The **Civil Partnerships Act 2004** gives same sex couples the ability to register their relationships legally in the same way as a marriage.

The **Marriage (Same Sex Couples) Act 2013**, the main purpose is to enable same sex couples to marry.

Gender Reassignment

Transsexual people are protected under the **Equality Act 2010**.

The **Gender Recognition Act 2004** enables transsexual people to apply for gender recognition. The Act requires the applicant to be at least 18 years old; have, or have had gender dysphoria; have lived in the acquired gender for at least two years before making the application and intend to continue to live in the acquired gender for the rest

of their life. Evidence is presented to a Gender Recognition Panel, which considers each individual case and where appropriate issues a Gender Recognition Certificate.

Once a gender recognition certificate is issued to an applicant, the person's gender becomes for all purposes the acquired gender and they are protected under that gender by law. For example, an applicant who was born a male, would in law, become a female. She would therefore be protected as a female under the Sex Discrimination Act 1975; and would be considered to be female for the purposes of the Matrimonial Causes Act 1973, and so able to contract a valid marriage with a man.

Age

The **Employment Equality (Age) Regulations 2006** was superseded by the **Equality Act 2010**.

The **Employment Equality (Age) Regulations 2006** it is unlawful to discriminate on the grounds of age on in the fields of employment and vocational training. It is unlawful to discriminate, either directly or indirectly, without justification, at any stage in the employment process, including recruitment, terms and conditions of employment, promotion, transfer, training and dismissal. The regulation also prohibits harassment and victimisation and applies to people of every age - young and old.

Cultural and Religious Belief

The **Employment Equality (Religion or Belief) Regulations 2003** was superseded by the **Equality Act 2010**.

Annex 4:

Website links for further information

www.education.gov.uk

Department for Education

www.equalityhumanrights.com

Equality and Human Rights Commission

www.ofsted.gov.uk

Ofsted (Office for Standards in Education)

<https://www.gov.uk/guidance/equality-act-2010-guidance> Equality Act 2010 guidance