Equality, Diversity and Inclusion Policy 2026-2027

Document Control

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Author	Head of Operations and Compliance
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1. Purpose

This policy sets out Supply Chain Academy Limited's commitment to promoting equality, diversity and inclusion across all aspects of its operations.
Supply Chain Academy Limited, referred to throughout this policy as "SCA", is committed to creating an inclusive learning and working environment in which everyone is treated fairly, with dignity and respect.

This policy explains how SCA will:

- prevent and address unlawful discrimination, harassment, sexual harassment and victimisation;
- promote equality of opportunity;
- value diversity and encourage inclusion;
- identify and remove barriers to access, participation, progression and achievement;
- identify, consider and implement reasonable adjustments where required;
- support learners, apprentices and staff with additional needs;
- promote dignity, respect and inclusive professional behaviours;
- monitor the experience and outcomes of different groups;
- use evidence, feedback and learner voice to improve practice.

This policy applies across recruitment, onboarding, employment, teaching, training, assessment, progress reviews, employer engagement, complaints, governance, quality assurance and service delivery.

2. Policy Statement

SCA will treat applicants, learners, apprentices, staff, job applicants, workers, employers, visitors and other stakeholders fairly, with dignity and respect.
SCA will not unlawfully discriminate against, harass or victimise any person. Decisions will be based on relevant, fair and objective criteria, with reasonable adjustments identified, considered and implemented where required.
SCA is committed to creating an environment in which:

- individual differences and lived experiences are respected;
- learners and staff are supported to participate and contribute;
- inappropriate language, bullying, harassment and discriminatory behaviour are challenged;
- barriers are identified early and addressed effectively;
- support is personalised, proportionate and regularly reviewed;
- no person is disadvantaged for raising a concern or supporting another person's complaint;
- equality, diversity and inclusion are embedded throughout the learner and staff lifecycle.

EDI is not treated as a standalone activity. It is embedded within SCA's culture, leadership, governance, curriculum, teaching, learning, assessment, safeguarding, employer engagement and quality assurance arrangements.

3. Principles

SCA's approach to EDI is underpinned by the following principles:

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- Fairness and equity: People are treated fairly and provided with equitable access to opportunities.
- Respect and dignity: Individuals are valued and treated with professionalism and respect.
- Inclusion: Barriers to access, participation, progression and achievement are identified and removed or reduced.
- Representation: Learning materials, curriculum content and organisational practices recognise the diversity of the communities and industries SCA serves.
- Accessibility: Information, learning and services are made accessible through inclusive design and reasonable adjustments.
- Accountability: EDI performance, risks and actions are monitored through leadership, governance and quality assurance.
- Learner voice: Learners are provided with opportunities to share their experiences and influence improvement.
- Continuous improvement: Practice evolves in response to evidence, feedback, legislation, guidance and changing needs.

4. Scope

This policy applies to:

- all applicants, learners and apprentices;
- all employees, workers, contractors, consultants and volunteers;
- members of the Senior Management Team and those responsible for governance;
- employers, workplace line managers and mentors supporting apprentices;
- subcontractors, delivery partners and end-point or apprenticeship assessment organisations, where relevant;
- visitors and other stakeholders interacting with SCA.

The policy applies to conduct:

- on SCA premises;
- in an apprentice's workplace;
- during online learning, meetings or communication;
- at events, visits and work-related activities;
- through email, social media, messaging platforms and other digital systems;
- outside normal working or learning hours where the conduct is connected with SCA or affects the safety, dignity or participation of an individual within the SCA community.

5. Protected Characteristics

The Equality Act 2010 identifies the following protected characteristics:

- age;
- disability;
- gender reassignment;
- marriage and civil partnership;

- pregnancy and maternity;
- race, including colour, nationality and ethnic or national origins;
- religion or belief, including a lack of religion or belief;
- sex;
- sexual orientation.

SCA also recognises that barriers or disadvantage may arise from factors not separately identified as protected characteristics, including:

- socioeconomic disadvantage;
- caring responsibilities;
- care experience;
- military or veteran status;
- language or communication needs;
- digital access;
- geographic location;
- previous educational experience.

These factors may be considered when identifying barriers and planning support. This does not change the statutory meaning of the protected characteristics under the Equality Act 2010.

6. Discrimination and Prohibited Conduct
SCA will prevent and address prohibited conduct, including the following.

6.1 Direct discrimination
Treating a person less favourably because of a protected characteristic.

6.2 Indirect discrimination
Applying a provision, criterion or practice that places people sharing a protected characteristic at a particular disadvantage and that cannot be objectively justified.

6.3 Discrimination arising from disability
Treating a disabled person unfavourably because of something arising from their disability, where that treatment cannot be objectively justified.

6.4 Failure to make reasonable adjustments
Failing to take reasonable steps to avoid or reduce substantial disadvantage experienced by a disabled person.

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

6.6 Sexual harassment
Unwanted conduct of a sexual nature that has the purpose or effect of violating a person's

dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.

6.7 Victimisation
Subjecting a person to a detriment because they have raised, supported or provided information about an equality concern or complaint.

6.8 Bullying
Offensive, intimidating, malicious or insulting behaviour, or an abuse or misuse of power, that undermines, humiliates or harms another person.

Discriminatory or offensive behaviour described as humour, joking or "banter" will not be treated as acceptable merely because no offence was claimed to be intended.

7. Reasonable Adjustments and Inclusive Support
SCA will identify, consider and implement reasonable adjustments where required to remove or reduce substantial disadvantage experienced by disabled applicants, learners, apprentices and staff.

SCA will not rely solely on a person having a formal diagnosis before considering support. Where SCA knows, or could reasonably be expected to know, that a person may be disabled or experiencing a significant barrier, it will discuss their needs sensitively and consider appropriate adjustments.

Reasonable adjustments and support may include:

- accessible or adapted learning materials;
- alternative document formats;
- assistive technology;
- adjusted communication methods;
- changes to timing, location or delivery arrangements;
- additional explanations, coaching or learning support;
- rest breaks or flexibility during learning activities;
- adjustments to assessment arrangements where permitted;
- physical access arrangements;
- support during English and maths learning;
- workplace adjustments agreed with the employer;
- liaison with the relevant assessment organisation regarding permitted assessment adjustments.

Support will be:

1. identified through initial assessment, disclosure, observation, progress review or an individual request;
2. discussed with the individual;
3. agreed and recorded within an appropriate support or training plan;
4. shared only with those who need the information to implement the support;
5. reviewed to evaluate its effectiveness;
6. amended where needs or circumstances change.

Cost alone will not automatically determine whether an adjustment is reasonable. Where learning support funding may apply, SCA will follow the current apprenticeship funding rules and supporting DWP guidance.

8. Positive Action

Where lawful and appropriate, SCA may take proportionate positive action to:

- address disadvantage experienced by people sharing a protected characteristic;
- meet particular or different needs;
- increase participation where evidence identifies under-representation.

Any positive action will be:

- based on relevant evidence;
- proportionate to the identified need or disadvantage;
- reviewed to evaluate its continued necessity and effectiveness;
- implemented in accordance with the Equality Act 2010.

Positive action will not amount to unlawful positive discrimination.

9. Recruitment, Employment and Progression

SCA is committed to fair, transparent and inclusive recruitment and employment practices.

SCA will:

- use role-relevant and objectively justified selection criteria;
- provide accessible recruitment and selection information;
- offer reasonable adjustments during recruitment and employment;
- avoid unnecessary barriers within job descriptions and person specifications;
- make decisions based on evidence, merit and the requirements of the role;
- provide equitable access to training, CPD and career development;
- consider flexible working requests in accordance with applicable requirements;
- maintain fair and consistently applied appraisal, grievance and disciplinary arrangements;
- monitor recruitment, progression, development and retention where proportionate and appropriate.

No applicant or member of staff will be treated less favourably because they have requested a reasonable adjustment or disclosed an additional need.

10. Preventing Harassment and Sexual Harassment

SCA will take proactive and reasonable steps to prevent workplace sexual harassment and other forms of harassment.

This will include, as appropriate:

- maintaining and communicating clear standards of conduct;
- assessing potential harassment risks;
- considering risks arising from contact with learners, employers, clients, contractors

and other third parties;
- providing appropriate staff training;
- making reporting and support arrangements accessible;
- acting on warning signs and emerging concerns;
- investigating concerns promptly, fairly and impartially;
- monitoring the effectiveness of preventative measures;
- reviewing arrangements following incidents, complaints or changes in working practices.

Detailed reporting and investigation arrangements are contained in SCA's harassment, safeguarding, grievance, complaints and disciplinary policies and procedures.

11. Curriculum, Teaching, Learning and Assessment
EDI is integral to curriculum design, teaching, training and assessment.

SCA will:
- provide learning that is accessible and appropriately challenging;
- apply inclusive teaching methods that support different learner needs;
- use examples and resources that reflect a range of people, roles and experiences;
- review learning materials for stereotypes, bias, discriminatory language and accessibility barriers;
- use inclusive language and explain specialist terminology;
- adapt teaching approaches in response to assessed need;
- create opportunities for learners to participate safely and respectfully;
- challenge stereotypes, discriminatory attitudes and inappropriate behaviour;
- develop learners' understanding of professional behaviours, equality, diversity, inclusion and mutual respect;
- ensure assessment arrangements are fair;
- ensure agreed access arrangements are implemented where permitted;
- use progress reviews to consider participation, support, wellbeing, workplace inclusion and emerging barriers;
- evaluate whether teaching and support are improving engagement, progress and achievement.

EDI content will be meaningful and relevant to the occupation, workplace and curriculum rather than being delivered only as an isolated activity.

Teaching staff will be supported through CPD and quality assurance processes to develop and maintain effective inclusive practice.

12. Employer and Workplace Responsibilities
Employers supporting SCA apprentices are expected to:
- provide a safe, respectful and inclusive workplace;
- comply with applicable equality and employment legislation;
- prevent and address discrimination, bullying and harassment;
- support agreed reasonable workplace adjustments;

- provide suitable supervision, mentoring and support;
- allow apprentices to access agreed learning support and off-the-job training;
- participate in progress reviews and support planning where appropriate;
- inform SCA of barriers that may affect learning, progress or safety, subject to confidentiality and data-protection requirements;
- raise concerns promptly;
- work collaboratively with SCA to remove or reduce barriers to learning, participation and achievement.

SCA will consider equality and inclusion within employer onboarding, contracting, health and safety vetting, progress reviews and quality assurance activity.

Where an employer is unwilling or unable to support an agreed adjustment or address a significant inclusion concern, SCA will review the situation with the apprentice and employer and determine appropriate action.

13. Learner Voice, Participation and Consultation

SCA will seek and act on feedback from learners, apprentices, staff and employers. Evidence may include:

- induction and onboarding feedback;
- learner surveys;
- progress review discussions;
- complaints, compliments and concerns;
- staff feedback;
- employer feedback;
- safeguarding and welfare themes;
- withdrawal and break-in-learning information;
- destination and progression information;
- equality, participation and achievement data.
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Feedback will be analysed to identify recurring barriers, differences in experience and areas for improvement.

Actions arising from feedback will be recorded, allocated to an appropriate owner and reviewed for effectiveness.

Learners will be provided with accessible opportunities to raise concerns and contribute to decisions affecting their learning experience.

14. Reporting Concerns, Complaints and Breaches

Any person who experiences, witnesses or becomes aware of discrimination, harassment, sexual harassment, victimisation, bullying or exclusion is encouraged to report it promptly. Concerns may be raised through:

- an Apprenticeship Trainer or another member of staff;
- the learner complaints procedure;

- the staff grievance procedure;
- the safeguarding reporting procedure;
- the whistleblowing procedure;
- the relevant harassment or disciplinary procedure;
- any named or anonymous reporting route made available by SCA.

Reports will be:

- taken seriously;
- handled sensitively;
- considered without unreasonable delay;
- investigated fairly and impartially;
- shared only where there is a legitimate need to know;
- recorded in accordance with data-protection and retention requirements.

SCA will not tolerate retaliation against a person who raises, supports or provides information about a concern in good faith.
Information will be handled sensitively and confidentially wherever possible. However, confidentiality cannot be guaranteed where there is:

- a safeguarding concern;
- a legal obligation to disclose information;
- a significant risk of harm;
- a requirement to investigate allegations fairly and effectively.

Where possible and appropriate, the person reporting the concern will be informed before information is shared.

Where a concern indicates a safeguarding risk, it will be referred immediately through SCA's safeguarding arrangements. Where the person is under the age of 18, SCA's child-centred safeguarding procedures will apply.

A breach of this policy may result in action under the relevant staff or learner disciplinary procedure or contractual arrangements.

15. Responsibilities

15.1 Senior Management Team

The Senior Management Team will:

- promote an inclusive organisational culture;
- ensure appropriate resources and training are available;
- consider equality implications within strategic and operational decisions;
- review EDI risks, performance information and improvement actions;
- ensure serious concerns are addressed;
- provide oversight of the policy's implementation.

15.2 Governance

Those responsible for governance will:

- provide oversight and constructive challenge;

- review significant EDI risks, trends and actions;
- scrutinise differences in access, participation, experience and outcomes;
- seek assurance that legal, regulatory and organisational responsibilities are being met;
- monitor the impact of improvement actions.

15.3 Head of Operations and Compliance

The Head of Operations and Compliance will:

- maintain this policy;
- coordinate EDI monitoring and reporting;
- provide compliance advice;
- ensure identified actions are assigned and tracked;
- report significant themes and risks to leadership and governance;
- coordinate policy review following material legal or regulatory change.

15.4 Managers and Programme Leads

Managers and Programme Leads will:

- implement this policy within their areas of responsibility;
- respond appropriately to support needs and equality concerns;
- ensure agreed adjustments are implemented;
- review curriculum, delivery and employment practices for barriers;
- monitor the effectiveness of support;
- escalate concerns through the appropriate procedure.

15.5 Staff

All staff will:

- comply with this policy;
- complete required EDI training;
- model inclusive professional behaviour;
- use respectful and inclusive language;
- implement agreed support and reasonable adjustments;
- challenge or report inappropriate conduct;
- protect confidential information;
- participate in monitoring and continuous improvement activity.

15.6 Learners and Apprentices

Learners and apprentices are expected to:

- treat others with dignity and respect;
- follow SCA and workplace conduct requirements;
- avoid discriminatory, harassing or bullying behaviour;
- report concerns or incidents;
- engage with agreed support and review arrangements;
- contribute positively to an inclusive learning and working environment.

15.7 Employers and Partners

Employers and partners are expected to:

- meet the responsibilities set out in this policy;
- provide inclusive learning and working environments;
- support agreed reasonable adjustments;
- address discriminatory or inappropriate behaviour;
- notify SCA promptly of relevant risks, concerns or barriers;
- work collaboratively with SCA to support apprentice participation, progress and achievement.

16. Training and Awareness

EDI will form part of staff induction and ongoing CPD.

Training will be appropriate to the person's role and may include:

- Equality Act responsibilities and protected characteristics;
- discrimination, harassment and victimisation;
- preventing sexual harassment;
- reasonable adjustments and disability inclusion;
- inclusive teaching, learning and assessment;
- identifying and removing barriers to learning;
- responding to disclosures and complaints;
- safeguarding links and vulnerability;
- cultural awareness and inclusive communication;
- bias within professional decision-making;
- data protection and confidentiality.
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Learners will receive appropriate EDI information through induction, curriculum delivery, progress reviews, learner communications and relevant personal development activities.

Employers and other stakeholders will receive appropriate EDI information and guidance relevant to their responsibilities.

The effectiveness of training will be evaluated through:

- staff and learner feedback;
- knowledge checks;
- quality assurance activity;
- observations of practice;
- complaints and concerns;
- evidence of changes to practice.

17. Monitoring, Evaluation and Accountability

SCA will monitor whether its EDI arrangements are being implemented effectively and having the intended impact.

Where data is available, reliable and proportionate, monitoring may include:

- applications, starts and participation;

- attendance and engagement;
- progress and completion;
- retention, withdrawal and breaks in learning;
- achievement and grade profiles;
- English and maths progress;
- access to learning support and reasonable adjustments;
- complaints, safeguarding concerns and conduct cases;
- staff recruitment, progression, development and retention;
- learner, staff and employer feedback;
- destinations and progression.

Data may be analysed by protected characteristic and other relevant indicators to identify patterns, gaps and barriers.

Equality-monitoring information may be collected, analysed and reported in anonymised or aggregated form to:

- identify trends;
- monitor participation, retention and achievement;
- evaluate the effectiveness of support and reasonable adjustments;
- inform strategic and operational decisions;
- support continuous improvement.

Small datasets will be handled carefully to protect confidentiality and reduce the risk of individuals being identified or misleading conclusions being drawn.

Where a gap, barrier or concern is identified, SCA will:

1. investigate possible causes;
2. obtain feedback from affected groups where appropriate;
3. agree proportionate improvement action;
4. assign responsibility and a review date;
5. monitor implementation;
6. evaluate whether the action has improved experience or outcomes;
7. report significant findings through leadership, quality assurance and governance arrangements.

18. Data Protection and Confidentiality

Personal information and special-category personal data collected for equality monitoring, support planning or reasonable adjustments will be:

- collected for a clear and lawful purpose;
- limited to information that is necessary;
- accurate and kept up to date where required;
- accessed only by authorised individuals;
- stored securely;
- retained and disposed of in accordance with SCA's retention arrangements;
- reported in anonymised or aggregated form where appropriate.

Equality-monitoring information will not be used to disadvantage an individual.

Information about a person's disability, health, protected characteristics or support needs will be shared only where there is a lawful basis and a legitimate need to know.

19. Related Policies and Procedures

This policy should be read alongside SCA's:

- Safeguarding Policy;
- Prevent Policy;
- Complaints Policy;
- Whistleblowing Policy;
- Staff Grievance Procedure;
- Staff Disciplinary Procedure;
- Learner Conduct or Disciplinary Policy;
- Unacceptable Behaviour, Harassment and Sexual Misconduct Policy;
- Staff and Learner Relationships Policy;
- Recruitment and Selection arrangements;
- Additional Learning Support and Reasonable Adjustments procedures;
- Data Protection Policy and Privacy Notices;
- Health and Safety Policy;
- Fitness to Study arrangements;
- Freedom of Speech and Academic Freedom Policy, where applicable.

20. Monitoring and Review

This policy will be reviewed annually and earlier where:

- legislation or statutory guidance changes;
- apprenticeship funding or inspection requirements change materially;
- monitoring identifies a significant equality risk, barrier or outcome gap;
- a serious complaint, incident or review identifies a policy weakness;
- organisational responsibilities or delivery arrangements change.

The policy owner will maintain an amendment record showing the reasons for substantive changes.

SMT APPROVAL

Date	Updates/Amendments	Signature
21/09/2022	No Amendments	N Roll
31/07/2023	Staff changes at Director level, new brand logo	N Roll
22/08/2024	Update on Annual EDI Training	N Roll
12/08/2025	Reviewed/updated in line with KCSIE 2025	N Roll
31/08/2026	Reviewed and updated for 2026–2027. Strengthened Equality Act definitions, reasonable adjustments, positive action, inclusive apprenticeship delivery, employer responsibilities, harassment prevention, reporting arrangements, confidentiality, equality monitoring and governance. Updated references to DWP apprenticeship guidance, Ofsted's Further Education and Skills Inspection Toolkit and KCSIE 202 where applicable.	Makayla Whyte