



Policy 1

# EQUALITY AND DIVERSITY POLICY

The following also forms part of this policy: -

Disability Access Policy  
Special Education Needs Policy  
Social, Emotional and Mental Health Policy



## **M.E.A.T** **(Ipswich) Limited**

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### **Principles**

MEAT have a responsibility to seek to ensure that MEAT is free from discrimination of any kind. [The Equality Act 2010](#) ensures that no person will be unlawfully discriminated against due to any protected characteristics that are detailed in the act. These are:

- Age (Applicable to staff but not applicable to students);
- Disability;
- Ethnicity;
- Gender Reassignment;
- Marriage and civil partnership;
- Pregnancy and maternity;
- Religion or belief;
- Sex & Sexual orientation;



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### **The following also forms part of MEAT’s Equality and Diversity Policy: -**

1. Disability Access Policy;
2. Special Education Needs Policy;
3. Social, Emotional and Mental Health Policy.

MEAT Equality and Diversity Policy is designed to help us positively promote each other’s individual rights and our responsibilities towards others.



MEAT is committed to inclusive learning; MEAT takes its responsibilities under The Equality Act 2010 very seriously.

MEAT does not directly recruit Apprentices the employers recruit their learners. We may support the employers via the National Apprenticeship Site (NAS), our website and general advice on modern recruiting practises. A potential learner has to complete a trial period of usually 2 months before pre visit and sign up at least 2 weeks later. Recruitment and selection with the employer's company policies and procedures.

MEAT is committed to inclusive learning; MEAT take its responsibilities under The Equality Act 2010 very seriously.

To do this, we will;

- Provide a welcoming environment in which all learners and employees are encouraged to realise their full potential, where every individual is valued and offered equal opportunity to progress;
- Ensure that all actual learners and employees are treated in an equivalent fashion, regardless of: age, disability; family responsibility, marital status, race, colour, ethnicity, nationality, religion or belief, gender, sexual orientation, and any other irrelevant criteria.

## **Policy Statement**

MEAT aims to provide a welcoming environment in which all learners and employees are encouraged to realise their full potential, where every individual is valued and offered equal opportunity to progress.

## **Key Principles**

MEAT believes that all forms of prejudice and discrimination are unacceptable in recognition of the fact that they can take a variety of forms, depending on the group against whom they are directed, MEAT will adapt/develop policies embodying the issues specific to discrimination on the grounds of the nine protected characteristics as listed on page 1 and explained in Appendix 1.

- MEAT will seek to challenge inequality, prejudice and discrimination;
- MEAT will seek to advance equality of opportunity and foster good relations between people who share a protected characteristic and those who do not;
- MEAT embraces diversity in all its aspects, and aims to have a workforce, governing body and learner population which reflects, where possible, the community it serves;
- MEAT will treat all employees and learners with respect and dignity, and seek to provide a working and learning environment free from harassment, discrimination and victimisation;
- MEAT will not tolerate any form of discriminatory behaviour against its employees and learners either from other employees, learners, or members of the public and will work to eliminate bullying and harassment in all its forms. Prompt and considerate action will be taken to investigate incidents of bullying and harassment;
- In seeking to achieve a balanced workforce and learner population at all levels, MEAT will ensure that no employee, job applicant or candidate for promotion will be disadvantaged, or treated



less favourably because of conditions or requirements that are not related to the job or programme of learning. Reasonable adjustments will be made to arrangements and premises to ensure equal access for people with disabilities;

- In order to ensure that all staff and potential staff are treated with equality and fairness at all stages of employment and the learning programme, and that their treatment is based solely on objective and job/programme of learning related criteria, MEAT will ensure that equality issues are embedded into all its policies and procedures.

### **Promotion of Policy**

- MEAT seeks to actively promote equality and diversity throughout the company. For learners we ensure it is adequately covered within learner induction, the group tutorial process and embedded fully into the curriculum. All staff are trained and certificated in Safeguarding;
- MEAT ensures Staff have and all learners are encouraged to take online training in Prevent for Support Staff, what can you trust, Radicalisation and Extremism, Staying Safe Online and British Values Assessments;
- MEAT feel with the tools individual staff gain from these online training and assessments will help/support MEAT learners and staff continue to be mindful of what our or potential learners could be facing. Along with looking out for symptoms such as; constant worrying, fear, feeling excessively sad/low, confused thinking, problems concentrating/learning and moods.

MEAT hope learners will be better prepared for the world we now live in with the constant online platforms available which they may face on a daily or ad hoc basis, bringing its own issues with mental health. All learners receive two weekly learner support call, these are themed so there are always discussions about their personal wellbeing, along with their take/understanding off safeguarding/prevent/extremism and British values mean to them.

MEAT will make reasonable adjustment and offer support to all our learners and understand some young men between the ages of 18-24 are more susceptible to mental health 4 out of 10 will experience depression and 1 out of 6 adults has a common mental disorder in the UK.

National Statistics suggest the top 6 mental health problems are: -

- Mixed anxiety and depression: 8 in 100 people;
- Generalised anxiety disorder (GAD): 6 in 100 people;
- Post-traumatic stress disorder (PTSD): 4 in 100 people;
- Depression: 3 in 100 people;
- Phobias: 2 in 100 people;
- Obsessive-compulsive disorder (OCD): 1 in 100 people.

MEAT trainers/staff will look out for mannerism which the young and/or vulnerable learners may display and signpost these individuals.

MEAT has contacts with local community groups and other relevant organisations, which include the Black, Asian and Minority Ethnic (BAME) community sector, working in partnership, where appropriate, to encourage and facilitate access to education, training and employment.



## Structures

- The Managing Director, General Manager and Trainers will promote Equality and Diversity across MEAT and support individuals;
- The embedding of Equality and Diversity in the Curriculum will be reviewed and monitored through Teaching and Learning Observations, and other Quality processes, including the Self-Assessment Review.

## Monitoring

- MEAT undertakes to conduct effective monitoring of all aspects of staffing and the learner population;
- MEAT is committed to the collection of statistics, as well as monitoring on an ongoing basis and as policies and practices change. Equality and Diversity will also be monitored as part of the Course Review and Self-Assessment Review processes (PICS) for learners;
- The main forms of monitoring used by MEAT is the composition of the existing workforce, and learner population, the recruitment processes, learner retention and achievement with particular reference to ethnicity, age, disability and gender.

## Training

Equality and diversity training is provided to all staff as part of the induction process, including mandatory completion of the on-line Equality and Diversity Essentials modules. If any member of staff wishes to do any Specific Equality and Diversity training, they are free to do so.

## Raising Concerns

If an employee believes they have not been treated fairly within the scope of this policy, they may raise the matter to MEAT's General Manager, Managing Director or Staff members Dealing with Bullying and Harassment at Work or Grievance Procedures.

Similarly, if a learner believes they have not been treated fairly within the scope of this policy they may raise the matter through MEAT dealing with Bullying and Harassment, Grievance or Complaints Procedures.

## Publicising the Policy

MEAT's commitment to equal opportunities and the Equality and Diversity policy will be communicated widely to employees, learners and the public through:

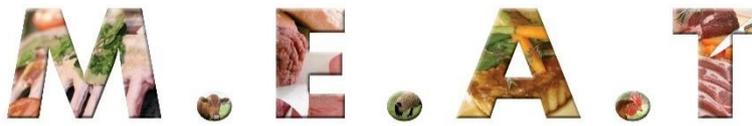
- Employee and learner induction book
- Through the website
- Copies of the policy provided to work based learning and work employer providers, with a requirement for them to adopt the Policy via our website if they do not already have one in place.

## Review

This policy will be reviewed on a regular basis in accordance with legislative developments and the need for good practice.

## Supporting Policies/Procedures

- Anti-Bullying Policy;



- Monitoring Equality & Diversity at MEAT;
- Procedure of IQA.

## Overview of ALS

MEAT is committed to inclusive learning and widening participation; we also take its responsibilities under the Equality Act very seriously. This means that all applicants and learners who have disabilities or learning difficulties are entitled to receive support to enable them to participate as fully as possible and to complete their programme of study successfully.

Additional Learning Support (ALS) includes any activity providing direct support to an individual learner over and above that's provided in a standard programme, and which leads to achievement of their qualifications and learning goals. The need may arise from a learning difficulty or disability, or from English, maths, or language support requirements.

MEAT strives to meet ALS needs on an individual basis; an assessment will be undertaken.

## What Constitutes Learning Support?

- Specialist equipment to support identified learners;
- Support for those who have a medical condition that qualifies for a learning support plan;
- Tutors for learners with specific learning difficulties;
- Exam Concession arrangements.

## Funding for Learning Support

ALS for learners with an identified ALS need (16-18, or 19-25 with an LDA)

## Identifying Support Needs

MEAT screens all learners for Standards Apprenticeship courses where a disability or learning difficulty is declared ALS might be appropriate. An assessment is carried to decide what ALS is required. External agencies and parents will be involved where required.

A copy of the ALS assessment is kept in the learner's file.

## Initial Assessment

Initial Assessment paperwork forms where a learning difficulty or disability has been declared

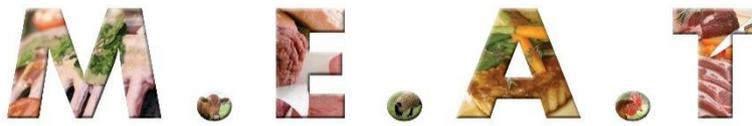
- Interview and communicate details to trainer where it is indicated that the learner will require support.

## Monitoring Additional Learning Support

- Keep records of learners identified as needing ALS;
- Organise appropriate transition arrangements for learners with complex needs;
- Ensure support is in place at the start of a learner's course;
- Ensure records are kept up-to-date with regard to ALS matters.

## Trainers

- Refer to information from the ALS learner files about the ALS needs of learners in their group and make adjustments to teaching, learning and assessment as necessary;
- Use GCSE results to set relevant SMART targets, take appropriate action, and monitor progress against needs;



- Work with ALS tutor assigned to learners by sharing ILP targets and contributing to ALS paperwork; to include ALS staff in planning.

## **Implementation of Support**

It is the responsibility of the trainer and management to check their records, learner files to ensure that learners needing support are identified and given early tutorial and support where appropriate. Regular contact is made between mentoring staff and training team throughout the year. Reviews are carried out throughout the year. The Information and trainer are informed immediately of any changes to a learner's support.

Additionally, we will:

- Support for each level 1, English, and maths class where possible;
- Ensure support is available as required by all other learners assessed for ALS;
- Take receipt of Referral Forms and arrange exam assessments;
- Arrange an initial meeting with a specialist tutor for assessments and to refer learners for additional specialist tutor support as needed.

## **Purposes**

To promote actively equal opportunities in all areas of MEAT:

1. To ensure that everyone is given the best training regardless of ability, gender, race, culture and disability, religion or sexual orientation;
2. To ensure that staff know their rights, and respect the rights of others;
3. To aim to ensure that prejudice or discrimination in all its forms is actively rejected;
4. To establish strategies to enable each individual to fulfil his/her potential to ensure equality of access to learning;
5. MEAT aims to make sure that this policy is used consistently by all staff members.

## **Practices - Responsibilities of Equal Opportunities**

1. Management will co-ordinate the policy;
2. Each member of staff should be aware of their responsibilities within the policy;
3. To create an environment that promotes dignity and respect for all and where individual differences and the contributions are valued and recognised.

## **Communication**

The policy will be communicated through the following mechanisms:

- The website;
  - Staff briefing;
  - Learner Induction Book;
  - Employers Guide;
1. All learners, staff and governors should be familiar with the policy and act in accordance with it;
  2. All staff members will take the lead on embedding Equality and Diversity;
  3. Success at MEAT should be celebrated.



## **Ethos**

1. All learners, staff and all those who communicate with MEAT will be made to feel welcome and included;
2. Appropriate attitudes, language and behaviour are actively promoted;
3. Procedures for dealing promptly with incidents of bullying, sexual, racial and disability discrimination are in place;
4. Opportunities for learners to develop a practical understanding of appropriate social relationships and the rights and responsibilities of individuals are implicit in all we do.

## **Access**

With due reference to the resources available: -

1. The learning environment should not prejudice any individual or group;
2. The learning environment at MEAT has been designed that where reasonably possible all learners and staff can access the range of provision;
3. All learners and staff will understand and value the importance of equal opportunities for all.

## **Curriculum**

1. All learners will have access to the apprenticeship programme;
2. All learners will have access to the full range of [CEAG](#) (Careers Education, Information, Advice and Guidance) online linked in MEAT Induction Book. In line with the current [Gatsby Benchmarks](#).

## **Resources**

Resources should be fit for purpose and regularly reviewed to ensure that they are appropriate and effective.

## **Staffing**

1. The Recruitment reflect the principles of equal opportunities and recognise the value of a diverse organisation;
2. Appropriate training and support are provided to ensure;
  - I. Staff incorporate the principles of equality and diversity into all aspects of their work;
  - II. All staff understand the issues and are equipped to identify, challenge and deal with incidents if they occur.

## **Monitoring and Review**

1. The policy will be reviewed every year. Changes will be presented during full staff meetings;
2. Management will monitor the operation of the policy.

## **The Benefits of Diversity Management**

A diverse workforce can offer a wide range of resources, skills, ideas and energy to the business, providing a competitive edge. Organisations that embrace diversity will reap the benefits of resourcing from a wider pool of talent, broaden their markets, improve productivity and raise the community profile.



Diversity management can benefit the organisation in a number of ways, i.e.

- Utilise the knowledge of different areas of the community;
- Understand market segments and consumer behaviour;
- Become an employer of choice;
- Have a more representative 'balanced' workforce;
- Value and respect employees, attracting and retaining a wider talent pool.

### **The Difference Between Diversity and Equality and Between Equality and Equity**

Diversity and equal opportunities are often regarded as the same thing. However, there are differences. Valuing diversity is about seeing everyone as individuals, valuing the abilities and skills they can bring to an organisation. It is not about seeing people first and foremost in terms of their membership of a particular group. Equality of regard for people is about emphasising inclusiveness, openness and fairness, offering a positive outlook on the many differences, as well as similarities, that can affect how people interact and perform with each other in the workplace. Diversity is about respecting differences within minority groups and not expecting everyone to conform to the ways of majority groups.

Widening diversity is something that is initiated internally, where a culture for diversity has developed over time. Equal opportunities are usually prompted by external factors such as legislation and codes of practice.

Managing diversity is concerned with improving quality within the organisation, with a focus on qualitative issues and good practice, whereas equal opportunities focus on improving numbers. This might include increasing the number of women in management positions, or increasing the number of ethnic minorities or raising the age profile.

Valuing people, and their many diverse qualities, enhances employee potential, therefore enhancing the business. Equal opportunities aim to ensure that no group receives less favourable treatment because of their differences, ensuring all people are treated equally. This is about adapting to individual needs rather than treating everyone the same.

Diversity at work is not only concerned with keeping within the confines of the law, but would also gradually seek to educate every staff member so that discrimination would become a thing of the past. While the legislation uses the term 'equality', MEAT is committed to considering how it can move beyond the idea of equality, towards equity. Equity means distributing resources based on the needs of individual recipients as opposed to giving everyone the exact same resource. An example of this would be providing a scribe for a learner who has a disability or injury that prevents them from being able to write or providing assistive technology for staff or learners so they are able to fully participate and engage with teaching, learning and assessment and other every day activities.

### **Legislative Background**

Under Equality legislation including the Equality Act 2010 and the Public Sector Equality Duty it is unlawful to (see Appendix 2):

- Discriminate directly against anyone and treat him/her less favourably than others on the grounds of the protected characteristics of: age (unless this can be justified as a proportionate means of achieving a legitimate aim), disability (including discrimination arising from a disability



and failure to make reasonable adjustments), gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief (including lack of belief), sex and sexual orientation. This also includes discrimination based on perception of the person e.g., a belief that someone is gay or a belief that someone is disabled even if this is not actually true;

- Discriminate against someone for reasons relating to their association with a person on the grounds of the protected characteristics of age, disability, gender reassignment, race, religion or belief, sex and sexual orientation e.g., discriminating against an employee/student because they have a disabled dependant;
- Discriminate indirectly against anyone by applying a criterion, provision or practice which disadvantages people with a protected characteristic (age, disability, gender reassignment, marriage and civil partnership, race, religion and belief (including lack of belief), sex and sexual orientation) unless the person applying the provision can justify it as a proportionate means of achieving a legitimate aim;
- Subject someone to harassment for reasons relating to age, disability, gender reassignment, race, religion and belief (including lack of belief), sex and sexual orientation. This includes behaviour that an individual finds offensive on these grounds even if the behaviour is not directed at the individual. It is unlawful to treat a person less favourably because they either submit to, or reject, sexual harassment or harassment related to their sex. An employer also has responsibilities relating to harassment of employees by third parties;
- Victimise someone because s/he has made, or intends to make, a complaint or allegation or has given or intends to give evidence in relation to a complaint of discrimination in line with the Equality Act.

## **Roles and Responsibilities**

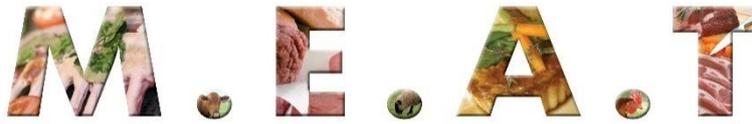
It is necessary for all staff to behave with dignity, courtesy and respect and to act in a manner that does not unlawfully discriminate at all times.

### **Managers**

- To lead non-discriminatory practices and to address any incidences of behaviour that fail to comply with this policy;
- Support apprentices raising issues associated with work places that they visit or operate from;
- To ensure employers that have apprentices or learners on work placements have appropriate Equality & Diversity Policies in place (to provide example ones and support with this as necessary);
- To support the aims of the Equality and Diversity policy;
- To undertake appropriate equality and diversity training.

### **Role of Staff**

- To actively encourage non-discriminatory practices and to report any incidences of behaviour that fail to comply with this policy;
- Support apprentices raising issues associated with work places that they visit or operate from;
- To support the aims of MEAT Equality and Diversity policy;
- To undertake appropriate equality and diversity training.



### **Role of Learners/Apprentices**

- Actively to encourage non-discriminatory practices and to report any incidences of behaviour that fail to comply with this policy;
- To support the aims of the Equality and Diversity policy;
- To be aware of equality and diversity issues.

### **Role of Employers**

- To ensure that they have up to date equality and diversity policies and procedures in place prior to having apprentices or learners on placement;
- To lead non-discriminatory practices and to address any incidences of behaviour that fail to comply with this or their own policies;
- To respond positively to apprentices raising issues;
- To seek advice from MEAT as required.

### **Genuine Occupational Requirement**

In very limited circumstances it will be lawful for an employer to treat people differently if it is a Genuine Occupational Requirement.

Where there is a genuine requirement for a particular type of person to do the job, the employee must be able to justify a sound business reason for this.

This may occur if it is necessary that, for example, a male or female is required to do a job involving personal care, or that an individual of a particular religion is required to do a job.

### **Work Life Balance**

MEAT has a commitment to work life balance. Staff at MEAT are entitled to flexibility in the following areas which are covered by relevant Policy:

#### **Maternity**

MEAT administers not only the statutory maternity. For more information of entitlements discuss with Managing Director.

#### **Paternity Leave**

To be entitled you will have worked at MEAT for 26 weeks or more by the 15th week before the child is expected to be born. You will be eligible for 2 weeks in a 1- or 2-weeks' block at any one time within 52 weeks of the birth or adoption of the child. Entitlement to pay is 2 weeks' full pay if you meet the requirements.

#### **Adoption Leave**

There is no length of service requirement for staff to be entitled to adoption leave. The employee's entitlement is to take up to 26 weeks' ordinary adoption leave followed immediately by up to 26 weeks' additional adoption leave.



## **Parental Leave and Shared Parental Leave**

You must have at least one year's service at MEAT to be entitled to take Parental leave. All eligible employees have a statutory right to take Shared Parental Leave.

## **Carers Leave**

Employees have a right to take a week of unpaid leave for caregiving responsibilities. This entitlement begins from their first day of employment and can be used to provide or arrange care for a dependent with long-term care needs. These include dependents with willingness's or injuries requiring care for over three months, those with disabilities, or elderly dependents.

MEAT employees are entitled to one week of unpaid leave every 12 months. This leave can be taken as full days, half days spread throughout the year, or all at once. If the request is for half a day or a day, the notice period must be at least 3 days. If the request is for more than one day, the notice period must be at least twice as long as the requested leave.

## **Flexible Working**

MEAT recognises that flexible working arrangements have mutual benefits and is committed to developing an enabling culture where a healthy work-life balance is the norm and employees are empowered to work in a flexible manner to do their best work if practicable to do so.

MEAT has introduced Remote Working – which can be a combination of working on-site and at home if possible, depending on the job role. Phased Retirement (a reduction in hours and/or days leading up to retirement).

## **Training**

All staff are entitled to request training. This might or might not lead to a qualification, it might be compulsory as part of the role, continuing professional development, or other training. All requests are considered on the basis of the need and relevance to the job being undertaken by the employee. There may be times when a request must be declined, postponed or offered on a conditional basis for legitimate business reasons. There may be occasions where the delivery method or day of training might coincide with a personal event, i.e., a religious festival. Where possible, considerations will be made on the basis of any request received by the Managing Director.

## **Breach of the Policy**

MEAT will take seriously any instances of breach of this policy by learners, staff, or visitors. Any breach will be investigated and where appropriate will be considered under the relevant disciplinary procedure for staff or learners. Regarding any breach of the policy by visitors, MEAT will take appropriate action in relation to the nature of the incident.

## **Complaints**

### **Complaints Made by Learners/Apprentices**

MEAT is committed to providing all learners with a high-quality service. We want to know if our service has not met with learners' expectations so that we can do something about it. Whenever possible learners should firstly talk with a trainer and tell them what has gone wrong. If the response is



unsatisfactory, a formal complaint can be raised. A formal complaint can be made emailing [admin@meatipsich.co.uk](mailto:admin@meatipsich.co.uk) We will explain what course of action will be taken and in what time frame.

### **Complaints Made by Staff**

Complaints made by staff can be made emailing [admin@meatipsich.co.uk](mailto:admin@meatipsich.co.uk), calling and requesting an appointment with the Managing Director/Manager.

## **Equality and Diversity Policy Appendix 1**

### **Protected Characteristics**

The Equality Act covers the same groups that were protected by existing equality legislation – age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership and pregnancy and maternity. These are now called ‘protected characteristics’ In addition the Act extends some protections to characteristics that were not previously covered, and also strengthens particular aspects of equality law.

The nine (9) Protected Characteristics key points:

- Age;
- Disability;
- Gender Reassignment;
- Marriage and Civil Partnership;
- Pregnancy and Maternity;
- Race including colour, nationality, ethnic or national origin;
- Religion or Belief;
- Sex;
- Sexual Orientation.

### **Age**

The Act protects people of all ages. However, different treatment because of age is not unlawful direct or indirect discrimination if you can justify it, i.e., if you can demonstrate that it is a proportionate means of meeting a legitimate aim. Age is the only protected characteristic that allows employers to justify direct discrimination.

### **Disability**

The Act has made it easier for a person to show that they are disabled and protected from disability discrimination. Under the Act, a person is disabled if they have a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities, which would include things like using a telephone, reading a book or using public transport.

As before, the Act puts a duty on MEAT to make reasonable adjustments to help staff overcome disadvantage resulting from an impairment (e.g., by providing assistive technologies to help visually impaired staff use computers effectively).

The Act includes a new protection from discrimination arising from disability. This states that it is discrimination to treat a disabled person unfavourably because of something connected with their disability (e.g., a tendency to make spelling mistakes arising from dyslexia). This type of discrimination is unlawful where the employer or other person acting for the employer knows, or could reasonably be



expected to know, that the person has a disability. This type of discrimination is only justifiable if an employer can show that it is a proportionate means of achieving a legitimate aim.

Additionally, indirect discrimination now covers disabled people. This means that a job applicant or employee could claim that a particular rule or requirement you have in place disadvantages people with the same disability. Unless you could justify this, it would be unlawful.

The Act also includes a new provision which makes it unlawful, except in certain circumstances, for employers to ask about a candidate's health before offering them work.

### **Gender Reassignment**

The Act provides protection for trans people. A trans person is someone who proposes to, starts or has completed a process to change his or her gender. The Act no longer requires a person to be under medical supervision to be protected – so a woman who decides to live as a man but does not undergo any medical procedures would be covered.

It is discrimination to treat trans people less favourably for being absent from work because they propose to undergo, are undergoing or have undergone gender reassignment than they would be treated if they were absent because they were ill or injured.

### **Marriage and Civil Partnership**

The Act protects employees who are married or in a civil partnership against discrimination. Single people are not protected.

### **Pregnancy and Maternity**

A woman is protected against discrimination on the grounds of pregnancy and maternity during the period of her pregnancy and any statutory maternity leave to which she is entitled. During this period, pregnancy and maternity discrimination cannot be treated as sex discrimination. MEAT must not take into account an employee's period of absence due to pregnancy related illness when making a decision about employment.

### **Race**

For the purposes of the Act 'race' includes colour, nationality and ethnic or national origins.

### **Religion or Belief**

In the Equality Act, religion includes any religion. It also includes a lack of religion, in other words employees or jobseekers are protected if they do not follow a certain religion or have no religion at all. Additionally, a religion must have a clear structure and belief system. Belief means any religious or philosophical belief or a lack of such belief. To be protected, a belief must satisfy various criteria, including that it is a weighty and substantial aspect of human life and behaviour. Denominations or sects within a religion can be considered a protected religion or religious belief.

Discrimination because of religion or belief can occur even where both the discriminator and recipient are of the same religion or belief.



## **Sex**

Both men and women are protected under the Act.

## **Sexual Orientation**

The Act protects bisexual, gay, heterosexual and lesbian people.

## **Equality and Diversity Policy Appendix 2 - Types of Discrimination: Definitions**

### **Direct Discrimination**

Direct discrimination occurs when someone is treated less favourably than another person because of a protected characteristic they have or are thought to have (see perception discrimination below), or because they associate with someone who has a protected characteristic (see discrimination by association below).

### **Discrimination by Association**

Already applies to race, religion or belief and sexual orientation. Now extended to cover age, disability, gender reassignment and sex. This is direct discrimination against someone because they associate with another person who possesses a protected characteristic.

### **Perception Discrimination**

Already applies to age, race, religion or belief and sexual orientation. Now extended to cover disability, gender reassignment and sex. 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**

Already applies to age, race, religion or belief, sex, sexual orientation and marriage and civil partnership. Now extended to cover disability and gender reassignment.

Indirect discrimination can occur when you have a condition, rule, policy or even a practice in your company that applies to everyone but particularly disadvantages people who share a protected characteristic. Indirect discrimination can be justified if you can show that you acted reasonably in managing your business, i.e., that it is 'a proportionate means of achieving a legitimate aim'. A legitimate aim might be any lawful decision you make in running your business or organisation, but if there is a discriminatory effect, the sole aim of reducing costs is likely to be unlawful.

Being proportionate really means being fair and reasonable, including showing that you've looked at 'less discriminatory' alternatives to any decision you make.

### **Harassment**

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

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Harassment applies to all protected characteristics except for pregnancy and maternity and marriage and civil partnership. Employees will now be able to complain of behaviour that they find offensive even if it is not directed at them, and the complainant need not possess the relevant characteristic themselves.

Employees are also protected from harassment because of perception and association.

## Third Party Harassment

Already applies to sex; however, this has now been extended to cover age, disability, gender reassignment, race, religion or belief and sexual orientation.

The Equality Act makes you potentially liable for harassment of your employees by people (third parties) who are not employees of your company, such as customers or clients. You will only be liable when harassment has occurred on at least two previous occasions, you are aware that it has taken place, and have not taken reasonable steps to prevent it from happening again.

## Victimisation

Victimisation occurs when an employee is treated badly because they have made or supported a complaint or raised a grievance under the Equality Act; or because they are suspected of doing so. An employee is not protected from victimisation if they have maliciously made or supported an untrue complaint.

There is no longer a need to compare treatment of a complainant with that of a person who has not made or supported a complaint under the Act.

## Equality and Diversity Policy Appendix 3 - Examples of types of discrimination

**Direct Discrimination** - Paul, a senior manager, turns down Angela's application for promotion to a supervisor position. Angela, who is a lesbian, learns that Paul did this because he believes the team that she applied to manage are homophobic. Paul thought that Angela's sexual orientation would prevent her from gaining the team's respect and managing them effectively. This is direct sexual orientation discrimination against Angela.

**Discrimination by Association** - June works as a project manager and is looking forward to a promised promotion. However, after she tells her boss that her mother, who lives at home, has had a stroke, the promotion is withdrawn. This may be discrimination against June because of her association with a disabled person.

**Perception Discrimination** - Jim is 45 but looks much younger. Many people assume that he is in his mid-20s. He is not allowed to represent his company at an international meeting because the Managing Director thinks that he is too young. Jim has been discriminated against on the perception of a protected characteristic.

**Indirect Discrimination** - A small finance company needs its staff to work late on a Friday afternoon to analyse stock prices in the American finance market. The figures arrive late on Friday because of the global time differences. During the winter some staff would like to be released early on Friday afternoon

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in order to be home before sunset – a requirement of their religion. They propose to make the time up later during the remainder of the week. The company is not able to agree to this request because the American figures are necessary to the business, they need to be worked on immediately and the company is too small to have anyone else able to do the work. The requirement to work on Friday afternoon is not unlawful indirect discrimination as it meets a legitimate business aim and there is no alternative means available.

**Harassment** - Paul is disabled and is claiming harassment against his line manager after she frequently teased and humiliated him about his disability. Richard shares an office with Paul and he too is claiming harassment, even though he is not disabled, as the manager's behaviour has also created an offensive environment for him.

Steve is continually being called gay and other related names by a group of employees at his work. Homophobic comments have been posted on the staff noticeboard about him by people from this group. Steve was recently physically pushed to the floor by one member of the group but is too scared to take action. Steve is not gay but heterosexual; furthermore, the group know he isn't gay. This is harassment because of sexual orientation.

**Harassment by Others** - Chris manages a Council benefits Office. One of his staff, Frank, is gay. Frank mentions to Chris that he is feeling unhappy after a claimant made homophobic remarks in his hearing. Chris is concerned and monitors the situation. Within a few days the claimant makes further offensive remarks. Chris reacts by having a word with the claimant, pointing out that this behaviour is unacceptable. He considers following it up with a letter to him pointing out that he will ban him if this happens again. Chris keeps Frank in the picture with the actions he is taking and believes he is taking reasonable steps to protect Frank from harassment.

**Victimisation** - Anne makes a formal complaint against her manager because she feels that she has been discriminated against because of marriage. Although the complaint is resolved through the organisation's grievance procedures, Anne is subsequently ostracised by her colleagues, including her manager. She could claim victimisation.

**Pregnancy and Maternity** - Lydia is pregnant and works at a call centre. Lydia's manager know that she is pregnant but disciplines her for taking too many toilets breaks as the manager would for any other member of staff. This is discrimination because of pregnancy and maternity as this characteristic doesn't require the normal comparison treatment of other employees.

## Equality and Diversity Policy Appendix 4- The Rehabilitation of Offenders

People with criminal records are protected by the Rehabilitation of Offenders Act 1974, which makes it unlawful for an employer to take account of (or be informed of) a person's previous offending history once the conviction has become spent. However, some sentences cannot be spent, and others may be 'spent' but still have to be declared if the employment involves nursing, social work, working with children in care or people with learning difficulties, handling money or national security (if relevant).

The Disclosure and Barring Service (DBS) was introduced by The Police Act 1997. This gave rise to employees and applicants in sensitive jobs having to give consent to a search being made for details of



any previous or current convictions and for employers to be advised of the outcome by way of a Disclosure service.

The Disclosure service provides a means for Human Resources (HR) to carry out checks through the DBS on staff or applicants and allows for decisions to be made about recruiting staff who have a criminal record.

Applicants are offered equal opportunities when going through the recruitment process. They are informed at the outset that they have the opportunity to discuss criminal convictions, 'spent' or 'unspent', in confidence.

All posts at MEAT are subject to an Enhanced Disclosure check. Therefore, anyone who applies to work at MEAT will be expected to declare any convictions 'spent' or 'unspent' and will be subject to consideration of suitability.

### **Data Protection**

When collecting, storing and analysing data full account must be taken of the Data Protection Act 2018. Therefore, it is imperative to ensure that personal data collected is used appropriately in accordance with the Act. Please refer to MEAT's Data Protection Policy for more information.

### **Equality and Diversity Policy Appendix 5 - Transgender Learner Procedures**

Information on changing names on birth certificates can be found in the following website:

<https://www.deedpoll.org.uk/can-a-birth-certificate-be-changed/>.

### **Procedure for Name Change**

Step 1	Learners that advise a member of staff that they wish to be known by a different name need to email their personal trainer of the main office to notify them of their change of details.
Step 2	Trainer will notify MIS (Management Information System) to request an update to the learners' records to show the name change and gender (If applicable).
Step 3	For the purpose of exam registration, the learners legal name needs to be used and exam certificates will be issued with their legal name

### **Transition**

Generally, transition can be split into two categories, social or medical.

1. Social transition is making the decision to live their life as their preferred gender. Young people or adults can socially transition without support from [Gender Identity Development Service](#) and without support from [Mental Health](#);
2. Medical Transition is where the young person or adult makes the decision to have hormone therapy or undertake surgery. Only GP's or Mental Health are able to refer. Once referred there is typically a 9-month waiting list before the initial assessment. The majority of referrals are aged between 14 and 16, although some are as young as 4 years old.



Learners over the age of 17, referral needs to be made to their regional adult gender identity clinic.

## **Dress Code**

Trans and gender questioning learners have the right to dress in a manner consistent with their gender identity.

## **Confidentiality**

All learners, including trans or gender non confirming young people or adults, have the right to privacy, this means that members of staff should not:

- Disclose information that may reveal a learner's transgender or non-conforming presentation to others, which includes parents, carers and anyone else from MEAT unless legally required to do so or because the young person/adult has specifically asked you to.
- Staff should not discuss trans gender learners outside of MEAT, even with close friends, even when no reference is made to their name. The Trans community is such a small one, that even a small reference, could compromise confidentiality. Additionally, it is also a criminal offence to for anyone who acquires information about someone's trans status to pass that information to a third party without permission from the individual.
- Trans and gender questioning young people and adults have the right to discuss and express their gender identity and to decide when, with whom and how much information to share.

## **Sharing Information with Parents Carers**

Confidential information should not be shared with parents or carers, without the young person's permission. If speaking with a parent or carer of a trans or gender questioning learner, it is important we use their legal name and the gender assigned at birth pronouns, unless specifically otherwise by the young person, adult.

## **Residential Trips**

To exclude trans learners from residential trips would contravene the Equality Act.

Trans learners should be able to sleep in sharing rooms appropriate to their gender identity. In cases where the Trans learner does not feel comfortable with this, alternative sleeping arrangements should be made. This consideration needs to apply to all learners' preferences or protected characteristics.

Trips abroad will require learners to have a passport, which may cause trans learners a problem.

Any concerns which individuals may have, as a member of staff, please refer to DSL.

## **Designated Staff with Responsibility for Supporting Transgender Learners**

MEAT staff have supported an individual Trans young person over the years.

- Elaine Wright

## **Interviewing Transgender learners**

It is important to adhere to professional code of practise within your areas, and the [Equality Act 2010](#). Should you have any concerns and wish to seek advice, please refer to DSL.



## Definitions

Biphobia	Fear or dislike of someone who identifies as being bisexual,
Bisexual	Refers to a person who has a romantic and or sexual orientation to more than one gender,
Cisgender	Refers to a person whose gender identity is the same as the sex they were assigned at birth,
Gender Dysphoria	Describes a person who experiences discomfort due to a mismatch between their sex at assigned birth and their gender identity,
Gender Fluid	When a person moves between gender identities,
Gender Reassignment	Is the legal term for describing a person's transition, this usually involves medical intervention, but it can equally mean, changing their name, pronoun, dressing according to their identified gender. Gender reassignment is a protected characteristic in the <a href="#">Equality Act 2010</a> ,
Gender variant	Someone who does not conform to the gender roles and behaviours assigned to them at birth. This term is usually used in relation to children,
Gender Questioning	When someone explores their own gender identity,
Intersex	Is a term used by people whose physical, biological sex characteristics differ from the typical male or female. They may have some male and some female characteristics. Intersex is an umbrella term used to describe a wide range of traits.
LGBT LGBTQI+	The acronym for lesbian, gay, bisexual and trans, if superseded with Q, I and +, it stands for Queer, Questioning, Intersex and the '+' representing and embracing other identities.
Non-Binary	A term used for someone who does not identify as male or female.
Trans	An umbrella term to describe people whose gender is not the same as, or does not sit comfortably with the sex they were assigned at birth.
Transitioning	There are two types of transitioning, medical and social. Medical refers to someone taking medical intervention such as hormone therapy and surgery. Not all trans people can have or want medical intervention. Social refers to someone who is informing friends and family of their transition, and is dressing according to their gender identity. A gender recognition certificate is required for a legal transition as legal gender is determined either by a birth certificate or by a gender recognition certificate.
Transsexual	This term is used in the <a href="#">Equality Act</a> to refer to someone who has transitioned to live in the gender identity of their choosing. Most Trans people prefer the term trans or transgender

## The Transition Process

The chart below provides an overview of a typical transition. Each individual's situation will vary depending on a range of factors, including whether or not a person opts for medical procedures, and whether they are receiving medical assistance privately or on the NHS.

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A person identifies that their physical gender is not their actual gender.
The person is diagnosed with gender dysphoria.
The person informs their institution that they want to transition to their preferred gender and will commence a real-life experience.
After at least three months, the person begins hormone therapy.
At the person's request, the institution updates its records to reflect any name change and their new gender.
A new learner file is created and any documents revealing their former name and gender that must be kept (for example, pension records) are marked 'confidential'.
If the person is a learner and they have changed their name, they are informed that they must legally change their name before a and awarding body or degree certificate can be issued in their new name.
After at least 12 months, the person may undergo genital surgery.
After two years of living in their chosen gender, whether or not they have undergone surgery, the person applies for a gender recognition certificate.
A gender recognition certificate is awarded and the person is issued with a new birth certificate.
The person is now legally recognised in their chosen gender – all documents and references that have not already been changed must now be changed.

## Useful Websites and Sources

- [The Beaumont Society](https://www.beaumontsociety.org.uk) is a support network that promotes better understanding of the conditions of transgender, transvestism and gender dysphoria.  
<https://www.beaumontsociety.org.uk>
- [Depend](http://www.depend.org.uk) is an organisation that offers free, confidential and non-judgmental advice, information and support to all family members, partners, spouses and friends of trans people  
[www.depend.org.uk](http://www.depend.org.uk)
- [Equality and Human Rights Commission](http://www.equalityhumanrights.com) is a statutory body with responsibility for protecting, enforcing and promoting equality across nine protected characteristics – age, disability, gender, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, and sexual orientation. [www.equalityhumanrights.com](http://www.equalityhumanrights.com)
- [Gender Identity Research and Education Society](http://www.gires.org.uk) initiates, promotes and supports research, particularly to address the needs of people who have a strong and ongoing desire to live and be accepted in the gender in which they identify, although different from that assigned at birth. [www.gires.org.uk](http://www.gires.org.uk)
- [The Gender Trust](http://www.gendertrust.org.uk) is recognised as an authoritative centre for professional people who encounter gender identity-related issues in the course of their work. In particular, this group includes employers, human resources officers, health workers and information services. National helpline: 0845 231 0505. [www.gendertrust.org.uk](http://www.gendertrust.org.uk)
- Mermaids UK provides support and information for children and teenagers who are trying to cope with gender identity issues, and for their families and carers. [www.mermaidsuk.org.uk](http://www.mermaidsuk.org.uk)
- **Press for Change** is a political lobbying and educational organisation that campaigns to achieve equal civil rights and liberties for all transgender people in the UK through legislation and social change. [www.pgc.org.uk](http://www.pgc.org.uk)
- **Transgender Zone** is an online resource that covers all aspects of transgender issues, including a section specifically for female-to-male trans people.



- [www.transgenderzone.com](http://www.transgenderzone.com)
- <https://genderedintelligence.co.uk/2012/11/17/17-15-02-A-Guide-For-Young-People.pdf>
- <https://mermaidsuk.org.uk/>
- <https://youthcymru.org.uk/cy/transform-cymru-2/>
- <https://www.stonewallcymru.org.uk/>
- <https://www.tuc.org.uk/>
- <https://do-it.org/organisations/unity-group-wales>
- <https://www.consortium.lgbt/member-directory/umbrella-cymru/>

## **Equality and Diversity Policy Appendix 6 - Culture Religion & Beliefs of Learners Statement of Intent**

MEAT has a general public duty to have due regard

1. To the elimination of discrimination, harassment and victimisation of learners on the grounds of religion or belief;
2. To advancing equality of opportunity between people who share a religion or belief and those who do not;
3. To fostering good relations between people who share a religion or belief and those who do not.

MEAT celebrates and values the diversity brought by its learners, and aims to create an environment where the cultural, religious and non-religious beliefs of all its learners and potential learners are respected.

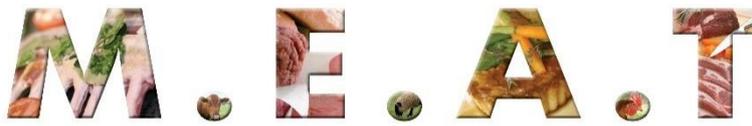
Everything in this policy has the aim of ensuring equal treatment for all learners, of any culture, religion or none. Through the implementation of the relevant Policies and Procedures, MEAT seeks to ensure that:

1. Recruitment and selection of potential learners are based entirely on relevant criteria, which do not include cultural or religious belief or non-belief;
2. Members of any culture, religion or beliefs are treated with equal dignity and fairness;
3. Under-represented groups in society are, where practically possible, identified and encouraged to apply for courses;
4. Where possible, appropriate services are provided to meet the cultural and religious needs of all learners.

The right to freedom of thought, conscience and religion is acknowledged, but the right to manifest beliefs is qualified by the need to protect the rights and freedoms of others. Any attempt at coercion or bullying of others to comply with a particular belief system, for example through distribution of hate literature, propaganda or offensive remarks, may result in disciplinary action against learners.

### **Dress Code**

Learners are required to dress in an appropriate fashion and in some cases are required to wear a uniform. Dress must comply with health and safety requirements. The wearing of items arising from particular cultural / religious norms (e.g., hijab, kippah) is welcomed under this policy.



The only limitations to the above are:

- Health and safety requirements may mean that for certain tasks specific items of clothing such as overalls and protective clothing need to be worn. If such clothing produces a conflict with an individual's religious belief, the issue will be sympathetically considered by the Managing Director with the aim of finding a satisfactory compromise.

## **Cultural and Religious Observance**

MEAT will ensure that all learners know that if they have special prayer requirements MEAT will, when requested, and where it is appropriate and practicable to do so, help provide facilities for the purposes of prayer however due to the nature of our business this may not be possible or practicable within their workplaces/spaces.

All learners, regardless of cultural or religious belief or non-belief are required to attend Review Progress Meeting for the period stipulated in their learning agreements. Trainers will make every attempt to ensure that those whose religion requires them to pray at certain times during the day are free to do so. Those who have such requirements should be accommodated, if it is possible to do so.

Any weekend learning agreements shall ensure that no-one is forced or pressured to learning at times when their cultural or religious beliefs forbid them to do so.

Consideration as far as possible with regards to course activities should be given to those learners fasting as part of their religious beliefs.

## **Extended Leave**

Learner's requests to take time-off learning to observe days of cultural or religious significance shall be sympathetically considered by the learner's Employer/Trainer.

## **Food Requirements**

MEAT undertakes that its catering will offer responsible alternatives for dietary needs and make every reasonable effort to accommodate those with religious or cultural dietary requirements, in response to requests from learners and visitors when attending MEAT premises.

## **Implementation and Responsibilities**

All relevant staff such as managers, trainers and tutors, are responsible for familiarising themselves with this policy, and for following it in matters such as learners' requests for time off to study.

All individual learners are responsible for familiarising themselves with the effect of this policy, for informing appropriate staff of their particular requirements, and for making up any time lost as a result of cultural / religious observance.

Any learner who feels that they have not been treated fairly in accordance with this policy should first try to resolve the matter by discussion with his or her Trainer. If this fails, the matter should be referred to the Managing Director.

All learners have a responsibility not to discriminate on the grounds of religion or belief. If staff feel that such discrimination is occurring, and persists after they have pointed it out to the learner and asked



them to stop, they should report the matter to the learner's Trainer, who, acting on behalf of MEAT, will take appropriate steps to deal with it.

All staff have a responsibility not to discriminate against or harass learners on the grounds of religion or belief. Any such discrimination or harassment should be dealt with under MEAT's disciplinary procedure. Staff should promote equality of opportunity for learners and seek to foster good relations between learners of different religions and beliefs or any of the other protected characteristics.

**Please note the following also forms part of MEAT's Equality and Diversity Policy: -**

- Disability Access Policy;
- Special Education Needs Policy;
- Social, Emotional and Mental Health Policy.

Signed

A handwritten signature in blue ink that reads "Jane Dale".

**JANE DALE**  
Managing Director

Reviewed: April 2024  
To be Reviewed: June 2025