

ACCESSIBILITY, EQUALITY, DIVERSITY AND INCLUSION POLICY AND PROCEDURE

1) Statement

Engineering Trust Training (ETT) is committed to providing inclusive, accessible, and equitable learning opportunities for all learners. We seek, through all our policies, procedures, and actions, to be a genuinely diverse and inclusive organisation. As such, we are committed to ensuring equality of opportunity and access for all who learn and work with us. We recognise that learners may require support whilst learning with us and reasonable adjustments to ensure they can access our programmes and overcome barriers they may face, such as coming from a disadvantaged background, having a Special Educational Need or Disability (SEND), having previously been known to children's social care or having other protected characteristics.

This policy outlines our approach to accessibility, equality, diversity, inclusion, and reasonable adjustments across all delivery and assessment contexts.

We will take reasonable steps to ensure all learners can access course content, can participate fully in learning activities, and can achieve at all stages of their learning journey with us.

We recognise and value the diversity of our learners and actively work to ensure equal opportunity is available to all who are looking to learn with us, and those who are learning with us.

We recognise that some of our learners will have specific needs and circumstances that may place them at a disadvantage. We will strive to identify and respond to barriers to participation so that these can be reduced or removed.

We will work to promote our programmes, so they are visible to, appeal to and are accessible for minority groups who are underrepresented in the wider engineering, manufacturing, and maintenance sector. This in turn contributes to the local and national drive to increase diversity within our sector.

We encourage everyone to report any form of discrimination, inappropriate conduct, bullying or harassment and want to give people the confidence to report any instances of this nature. Such reports can be made to any ETT member of staff.

2) Scope

- a) ETT expect all Stakeholders (applicants, learners, staff team members, trustees, employers, and sub-contractors) to behave in accordance with this policy.
- b) The principles of accessibility, equality, diversity, and inclusion apply to the way in which staff and learners should treat each other, and to all subcontractors, service providers, suppliers, former staff, former learners, and any other persons associated with the functions and work of ETT.

3) Aims of this policy

- a) Set expectations for Stakeholders to ensure all are treated with dignity and respect.

- b) Create the framework for an inclusive culture and environment that maximises accessibility to our programmes, participation in our programmes and delivers a safe, supportive, high-quality experience for all Stakeholders.
- c) Set out the framework within which accessibility, equality, diversity, and inclusion aspects are included within our universal offering and how reasonable adjustments can be implemented when required.
- d) Enhance the reputation of our programmes as inclusive training.
- e) Meet our legal and moral obligations to all Stakeholders.

4) Principles

- a) We recognise that some individuals and groups face persistent and longstanding disadvantage. To ensure genuine equality of access and opportunity, we are committed to working in a flexible and responsive way that meets specific needs.
- b) We value the richness that diversity brings to our organisation, industry, and community.
- c) Inclusion means identifying barriers that may present themselves and implementing a delivery structure that reduces or removes them before they become an issue, creating environments where everyone can participate fully and thrive. It means proactively adapting our services, practices, and procedures to accommodate the varied needs of learners and staff.
- d) We respect the rights of individuals to hold different views and beliefs. We are committed to preventing these differences from manifesting in ways that violate dignity or create hostile, degrading, or offensive environments.
- e) We seek to recognise and utilise the talents, perspectives, and experiences that every individual brings. Different learners contribute unique ideas, knowledge, and cultural insights that enrich our organisation and the learning experience of others.

5) Legal framework

- a) ETT endorses wholeheartedly the principles of:
 - i) Equality Act 2010
 - ii) SEND Code of Practice (2015)
 - iii) Keeping Children Safe in Education (KCSIE)
 - iv) Care Act 2014 (for vulnerable adults)
 - v) Data Protection Act 2018 / UK GDPR ETT will not unlawfully discriminate or exclude anyone based on personal characteristics or circumstances, including but not limited to age, disability, caring responsibilities, gender identity, marital status, political opinion, pregnancy, race, ethnicity, religion, sexual orientation, socio-economic background, or trade union membership.

6) Levels of support

- a) Universal Offering
 - i) Support and strategies that are built into our delivery and provided for every learner as part of our inclusive practice, high quality teaching, and assessment.
- b) Targeted (un-funded)
 - i) Additional support for learners who need more than the universal offering but do not require funded adjustment.
- c) Funded
 - i) Highly individual support for learners where the adjustment is significant and requires the claim of additional funding.

7) Identification, assessment and delivery of accessibility, equality, diversity, inclusion, and reasonable adjustment.

- a) All policy and procedures are designed to promote accessibility, equality, diversity, and inclusion within every area of our work.

- b) Identifications of any barriers in terms of accessibility, equality, diversity, and inclusion is considered at every part of the learner journey with corresponding actions to design delivery that reduces the impact of these within our universal offering.
- c) Identification of barriers that require targeted or funded adjustments are done on a case-by-case basis driven by both statemented and un-statemented indicators.
- d) Identification and actions driven by aspects such as the:
 - i) information advice and guidance given to people considering learning with us;
 - ii) images, language, and methods used to promote our learning programmes;
 - iii) information gathered during the application and pre-programme process;
 - iv) support given during the interview and selection process;
 - v) approach taken to delivery of learning, our values, and the behaviours we seek to impart on learners during their programme;
 - vi) approach to our work with employers and the way they approach the employment and training of our learners;
 - vii) approach to subcontracted learning; and
 - viii) approach to the quality of learner work and engagement required during the programme and our assessment methods to confirm understanding and competency.
- e) Proactive work to put in place reasonable adjustment to remove or reduce barriers
 - i) Learning Support Assessment forms (LSA) forms are used in a timely manner by staff team members to assess any aspect or support an individual learner may need. LSAs must be completed at the beginning of the programme if a need is identified during the pre-programme process, or later during the programme if a need is identified. LSA forms are submitted to either the Head of Delivery (Training Officers) & Head of Academy (Lecturers) for review, moderation, and support in establishing the level of support that is required.
 - ii) If targeted or funded learning support is required, a Learning Support Plan (LSP) is produced which sets out how the reasonable adjustment will be implemented, coordinated, and recorded with all relevant parties agreeing to the plan. This is then reviewed every 4 months to ensure the adjustment or adjustments are providing the support the learner needs and having a positive effect on the learner's experience and progress. The Operations Admin. Lead liaises with the Finance and Funding Coordinator to ensure any funding or bursaries associated to an LSP are drawn down. All claims must be supported by monthly evidence of the support delivered in line with Apprenticeship Funding Rules
 - iii) If no learning support is required, the LSA will be reviewed every 4 months to check the assessment if still valid. Support will be given as part of our universal offering and the LSA will also be reviewed if there is an indication that the learner is not progressing, progressing slower than expected or struggling to access any element of their programme.
- f) Reasonable adjustment in respect of assessment or examination
 - i) Requests for reasonable adjustment must be submitted at least 30 days before an assessment or examination to either the Head of Delivery or Head of Academy.
 - ii) Requests for modified assessment materials should be made no later than 10 weeks prior to the planned assessment date, unless otherwise stated by the Awarding Organisation
- g) Evidencing and normal working
 - i) ETT ensures that all reasonable adjustments reflect the learner's normal way of working. Evidence may include:
 - diagnostic assessments;
 - specialist or educational psychology reports;

- records of classroom support;
- prior access arrangements; or
- tutor notes.

ii) Evidence supporting each LSA or LSP must be retained securely for a minimum of six years and made available for audit or inspection if required.

h) Reasonable adjustment in practice

- i) We will, as far as reasonably practicable, make adjustments to ensure that learners' needs are identified and met wherever and whenever possible.
- ii) All learners have access to a range of support through their Training Officer, TESA Tutors, ETT SMT or Subcontracted provision.
- iii) Permitted Adjustments
- i) Examples built into our universal offering (but is not limited to)
 - i) Assistance through the application and interview process
 - ii) Assistance in negotiating adjustments in the workplace with the employer
 - Differentiated teaching and assessment
 - Signposting to counselling and other professional services
 - iii) Training on supportive technology
- j) Examples of targeted and funded adjustments (but not limited to)
 - i) Adapted materials (large print, coloured paper)
 - ii) Personalised exam and assessment arrangements including
 - Extra time in assessments
 - Supervised rest breaks
 - Use of a reader or scribe (where appropriate)
 - Separate room for assessment
 - Witness statements
 - Observation
 - iii) Adjustment in physical access to TESA or subcontracted provision
 - iv) Diagnostic assessment
 - v) 1 to 1 specialist support
 - vi) Additional support from Training Officers, Lecturers and/or ETT staff
 - vii) Additional tutorial support from third parties
 - viii) Signposting to counselling and other professional services
 - ix) Support with executive functioning
 - x) Support with welfare, financial and social issues
- k) Examples of Non-Permitted Adjustments
 - i) Reducing the number of assessed tasks
 - ii) Changing the criteria for assessment
 - iii) Allowing another person to demonstrate a required competency
 - iv) Altering grading thresholds
- l) Review of adjustments
 - i) All reasonable adjustments will be reviewed periodically, and no less than annually, to confirm that they remain suitable for the learner's needs.
 - ii) Where a learner's circumstances or evidence change, ETT staff will update the LSA or LSP and, if necessary, resubmit any request to an Assessment Organisation or EPAO in line with their requirements.
- m) Preserving assessment integrity
 - i) ETT will ensure that reasonable adjustments remove or reduce barriers to learning and assessment without compromising the competence standards or integrity of the assessment.
 - ii) Adjustments will never provide an unfair advantage or change the skill, knowledge, or behaviour being assessed.

8) Roles and responsibilities

- a) ET Trustee Board
 - i) To adopt and monitor this policy.
 - ii) To ensure that ETT takes all reasonable steps to be compliant with the law.
 - iii) Ensure accessibility, equality, diversity, inclusion, and reasonable adjustment is part of their governance framework.
 - iv) Attend appropriate training and stay up to date with changes in government or regulatory policy.
 - v) Audit, support and guide ETT.
- b) ETT CEO
 - i) Adhere to this Policy and empower ETT staff to implement this policy.
 - ii) Treat all Stakeholders fairly in line with the aims, principles and legal framework set out in this policy.
 - iii) Ensure learner and staff team members are aware of their rights and responsibilities in relation to accessibility, equality, diversity, inclusion, and reasonable adjustment through appropriate communication and training.
 - iv) Promote the principles of accessibility, equality, diversity, inclusion, and reasonable adjustment, enhancing them when setting the strategy of the organisation, developing the framework within which the organisation operates and setting values within which the staff team operate within.
 - v) Treat all reports of incidents of unfair treatment, discrimination, harassment and victimisation with due seriousness.
 - vi) Report any serious incidents involving accessibility, equality, diversity, inclusion or reasonable adjustment to the Trustee Board with the implications involved and actions taken.
 - vii) Provide the Trustee Board with appropriate data to enable them to execute their responsibilities as set out in this policy.
- c) ETT Senior Management Team (SMT)
 - i) Adhere to this Policy.
 - ii) Treat all Stakeholders fairly in line with the aims, principles and legal framework set out in this policy.
 - iii) Support staff team members, employers and subcontractors to make reasonable adjustments so learners can complete their programmes without disadvantage or unnecessary barriers.
 - iv) The Director of Operations and Delivery holds responsibility for the implementation of this policy at a delivery level.
 - v) Head of Delivery & Head of Academy hold responsibility for the coordinating delivery of this policy including completion of LSA forms and delivery of any actions in subsequent LSPs. This may include compliance with aspects such as existing EHCPs or with regulators such as Awarding Bodies and/or EPAOs.
 - vi) The Head of Quality, Risk and Compliance operates in a process coordination capacity, advising on reasonable adjustment and testing the quality and effectiveness of any LSA and LSP.
 - vii) The Head of Quality, Risk and Compliance holds responsibility for reviewing this policy and its effectiveness, addressing escalated issues, and authorising updates.
 - viii) Develop and maintain learning platforms that complies with Web Content Accessibility Guidelines (WCAG) to maximise participation and engagement.
- d) ETT Staff Team Members & Subcontractors
 - i) Adhere to this Policy.
 - ii) Treat all Stakeholders fairly in line with the aims, principles and legal framework set out in this policy.

- iii) Challenge prejudice, discrimination, flagged language or behaviour from any Stakeholder and report incidents to the SMT, CEO or Trustee Board as appropriate. This includes any actions at any location that does/could create an intimidating, hostile, or discriminatory environment.
- iv) Complete and submit LSAs for their learners which include requests for reasonable adjustment. Complete, submit and deliver against an LSP, ensuring compliance with aspects such as existing EHCPs or with regulators such as Awarding Bodies and/or EPAOs.
- v) Strive to deliver teaching, assessment, and learning methods and materials that meet the needs of individuals who may face barriers. Staff must approach this responsibility proactively, supporting learners by identifying the need for and/or making reasonable adjustments so they can complete their programmes without disadvantage or unnecessary barriers.
- vi) Record and act on feedback or complaints regarding inaccessible learning objectives, programme content, or resources. Share/escalate feedback or complaints to SMT members, CEO or Board of Trustees to drive ongoing improvements in inclusive learning.
- vii) Work with employers to ensure their opportunities and environments are accessible, promoting equal participation for all learners.
- e) ETT Learners
 - i) Adhere to this Policy.
 - ii) Treat all Stakeholders fairly in line with the aims, principles and legal framework set out in this policy.
 - iii) Communicate any barriers they may face with an ETT member of staff at their earliest convenience. Opportunity is given during the application process however a request for learning support or reasonable adjustment can be made at any point during their programme.
 - iv) Report any incidence of prejudice or discrimination (either against themselves or witnessed against another) to their Training Officer, Lecturer, Subcontracted college, Employer, ETT CEO or the Trustee Board as appropriate.

9) Record keeping and monitoring

- a) ETT maintains a central record of all learners who have disclosed that they come from a disadvantaged background, have a SEND, have previously been known to children's social care or have a protected characteristic.
- b) ETT hold an LSA and when required an LSP for learners that records the assessment, plan, delivery and outcome of any reasonable adjustment implemented. The documents also include review dates.
- c) The Head of Quality, Risk and Compliance quality assures LSAs and LSPs, working with the other head of departments to ensure interventions are effective and timely.
- d) The central record including the LSAs and LSPs are reviewed by the SMT to ensure the Director of Delivery and Engagement, CEO and the Board of Trustees are informed about the diversity of the learners on programme, ensure adjustments are in place where required and that the adjustments are having a positive impact on learner experience and achievement. This process also allows for challenge in terms of decisions that have been made or adjustments that have been put in place. Additionally, this process protects funding drawn in respect of any specific learner to support their additional learning need.

- e) ETT will assess and review the effectiveness on this policy and procedure through collection and analysis of data. Sources will include:
 - i) Applications and appointment of new apprentices
 - ii) Progression and attainment of apprentices
 - iii) Recruitment and selection of staff
 - iv) Complaints, linked to the range of protected characteristics, including harassment and bullying, grievances and disciplinary proceedings for staff and learners.
 - v) Surveys of learners and employers
 - vi) Results from the monitoring process will be used to shape and inform our approach to Equality, Diversity and Inclusion.

10) Appeals and complaints relating to reasonable adjustments

- a) We strive to offer every learner the support they need to be successful in their programme and wider employment.
- b) Learners who wish to appeal a decision relating to a reasonable adjustment should submit their appeal in writing to the Head of Delivery or Head of Academy within 10 working days of notification. The SMT will review the decision.
- c) Learners not satisfied with the learning support being offered/delivered or if learning support is denied, in the first instance, they should direct their complaint to their Training Officer, Lecturer or Employer. The issue should be raised with the Head of Delivery or Head of Academy who will attempt to resolve the complaint informally.
- d) If still dissatisfied, learners should follow our Complaints Policy and Procedure.
- e) The matter can also be referred to the relevant Assessment Organisation or EPAO in accordance with their appeals procedure.

11) Safeguarding and additional vulnerabilities

- a) ETT recognises that learners with additional learning needs or disabilities may have heightened safeguarding vulnerabilities.
- b) Our Safeguarding Policy and Procedure ensures that these needs are recognised and responded to promptly.
- c) Where appropriate, referrals or additional support arrangements are coordinated through ETT Designated Safeguarding Leads or external agencies as needed.

12) Digital accessibility

- a) ETT is committed to ensuring that all digital learning materials and platforms meet the Web Content Accessibility Guidelines (WCAG 2.1) Level AA standard wherever practicable.
- b) Accessibility audits are conducted annually, and any actions added to the quality improvement plan to address any identified issues.
- c) Learner feedback on digital accessibility is requested, recorded and acted upon.

13) Staff Training

- a) All new ETT staff undertake training as part of their induction programme. This ensures awareness of inclusive practice, documentation requirements, and the procedures set out in this policy.
- b) Refresher training is provided annually through standardisation meetings, team meetings, and '20-Minute Training Sessions'.
- c) Training records are maintained by staff and reviewed by the SMT.