



Helping people, organisations and economies
develop their skills for growth

Inclusion & Diversity (I&D) Policy

Revision History

Policy Owner for Update purposes: People Function

Shared with: Group Employee Forum, Unite and I&D Champion Network and Group Executive Team.

Approved by: Group Executive Team

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Inclusion & Diversity (I&D) Policy

WHO DOES THIS POLICY APPLY TO?

This policy applies to all City & Guilds Group employees, globally. We have referred to UK legislation as guiding principles but acknowledge there may be local legislation that supersedes this policy. However, we do expect all employees to act within the spirit of this policy whilst working for or representing the Group.

We also require that clients, customers, partners and suppliers be made aware of this policy and operate within it.

This policy does not form part of any employee's contract of employment, and it may be amended at any time in consultation with staff representatives.

This policy will be shared with all employees and adherence and compliance will be monitored by our Group Executive Team and our Trustees and will be reviewed on annual basis or as needed in line with changes to legislation or business process.

DEFINITIONS

At the City & Guilds Group, we believe we need **both** an inclusive culture and a diverse workforce to succeed. For the purposes of this policy, we define diversity as the composition of our colleagues or communities and how representative each group or community is in context and in our commercial practices. We define inclusion as how our culture and commercial practises make each individual (whether colleague, partner/supplier, customer or trainee) feel respected, valued, able to contribute and empowered to develop and grow.

STATEMENT

The City & Guilds Group is committed to improving diversity & inclusion within the way we work, and in how we deliver our purpose; to help people and organisations develop the skills they need for economic success and growth.

We are actively pursuing, implementing and reviewing working practices that enable a diverse and inclusive business strategy and working environment that is truly representative and supportive of our colleagues, customers and communities. We believe differences should be respected and valued, we have zero tolerance with regard to bullying, harassment, victimisation or unlawful discrimination. We are working towards a culture that enables colleagues from diverse backgrounds, experiences and communities and those we work with to be themselves and feel supported to meet their full potential and deliver their best work. We know that building a diverse and inclusive workforce and working with diverse partners will result in highly engaged colleagues, improved service for our customers and greater impact of our purpose.

Our commitment will be to review and expand this policy as part of our strategy on Inclusion and Diversity.

PURPOSE

The purpose of this policy is to:

- Provide equity, fairness and respect for all employees whether temporary, part-time or full-time
- Improve our ways of working and the service we deliver for our customers, trainees and stakeholders with inclusion and diversity in mind
- Ensure all employees regardless of (but not limited to) age, disability, gender identity, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality, and ethnic or national origin), religion or belief, sex; sexual orientation; economic status, personality, communication style and approaches to work feel supported in the organisation.
- Understanding, valuing and effectively managing these differences can create wide reaching benefits and success at an individual, team, organisational and societal level. Undeniably, it strengthens cultural relations and supports trust between people in different countries.
- Ensure that no employee sees diversity as a barrier to success or experiences any prejudice as a direct or indirect result of their difference.
- Not unlawfully discriminate because of the Equality Act 2010 protected characteristics or our any other legal discrimination laws across our organisation.
- Oppose and avoid all forms of unlawful discrimination. This is not limited to but includes pay and benefits, terms and conditions of employment, dealing with grievances and discipline, dismissal, redundancy, leave for parents and carers, requests for flexible working, and selection for employment, promotion, training or other developmental opportunities.

GENERAL PRINCIPLES

Inclusive Culture

- We encourage and promote inclusion and diversity in the workplace. We are curious about and respectful of differences in identity, skills, experiences and perspectives. We value difference because we know this is what's best for our people and it's our people that make up the business and allow us to serve our purpose.
- We review our employment practices and processes when necessary to ensure fairness, and also update them and the policy to take account of changes in the law.
- We commit to making sure an inclusive culture is available to all our current employees while striving to ensure the diversity of our people is reflective of the diversity of customers and communities. We welcome employment applications from a diverse range of candidates and are committed to ensuring our recruitment processes are inclusive and accessible to all.

Our cultural aspirations:

- We inspire each other to raise and achieve aspirations, working together to deliver our purpose.

- We put our curiosity to work to improve performance – for our customers and each other; creating environments for open discussion, dialogues, learning and spaces to educate and inform all our colleagues on different cultures, identities, religions etc
- We recognise and celebrate achievement, we value each other and empower our customers, learners/trainees and each other to grow.
- We hold ourselves and our colleagues accountable: to focus, to plan, to deliver and to make decisions effectively. We act with integrity in everything we do, and we value difference.

Recruitment & talent

- Promote vacancies internally as well as externally wherever possible to allow all colleague equal opportunity of access to roles. When externally recruiting we use diverse and targeted job boards, advertising methods or agency briefs to drive diverse hiring
- We are committed to transparent practices that support internal mobility and promote career experience opportunities like secondments to help colleagues progress and grow
- We adopt inclusive hiring practices wherever possible for example using panels with minority groups included in interviews and hiring managers consistently use the relevant documentation to aid in fair evaluation of and feedback to all candidates based on competency against the role
- We train hiring managers to improve consistency of positive hiring practices and raise awareness of as well as reduce the impact of unconscious bias

Learning & Development

- We make sure opportunities for training and development are reviewed, updated, transparent and available to all employees.
- We actively review the diversity mix of cohorts and trainers or coaches within our programmes to work towards better representation of communities and identities.
- Throughout our development programmes and regular communications, we explain our expectations of inclusive behaviour. Employees are encouraged to develop their full potential so their talents and resources can be fully utilised to maximise the efficiency of the organisation.
- Decisions concerning employees should be based on merit (apart from in any necessary and limited exemptions and exceptions allowed in law).

Products, services & suppliers

- We recognise the importance of inclusion and diversity within our strategy and as core to our purpose.
- We are committed to regularly reviewing the content, processes, and systems we use, and to further develop them, to ensure they are accessible, representative and inclusive.

- We encourage all of our colleagues to refer to our [Inclusion and Diversity Content Guide](#) to improve writing, content and materials.

Further information and detail is being created and will be updated over time.

Data & Insights

We want to understand the diverse make-up of our employees and monitor information where possible. Information can include age, sex, gender identity, ethnic background, sexual orientation, religion or belief, and disability in encouraging diversity and inclusion.

From time to time, we may encourage employees update their personal details via the HR system in order to ensure we have up to date diversity data. This helps us to better understand the diversity of our workforce and any areas that we may need to address that are underrepresented. Our systems only request data that is allowed to be collated within the legal jurisdiction of the country employees live.

All of our employee data is stored securely, and all system and storage providers are risk assessed in line with the information security and GDPR practices. Only authorised personnel (typically within the people or global business services function that need to access e.g. data analyst or MI specialist) have access to data and follow strict processing protocols. See link below to Employee Privacy Notice for transparency on what this means.

We also aim to understand the experiences, views and perspectives of different employee groups as well as those applying to work for us in order to continually improve the employee experience.

Anonymised diversity data will be reviewed quarterly at aggregate levels to help us identify patterns and trends for different diverse groups. No identifiable individual personal data will be used or disclosed. Where relevant we may share some of this data to demonstrate and evidence progress. Data will be reviewed by the I&D advisory board, Executive Team and Trustee Board.

We will use aggregated diversity data were available from our employee surveys to identify engagement levels by diverse groups. Please see our [Employee Privacy Notice](#).

Responsibilities & commitments: Our code of conduct

Every colleague is responsible for their contribution to our culture, where individual differences and the contributions of all employees are recognised and valued.

We promote dignity and respect for all and have zero tolerance with regard to bullying, harassment, victimisation or unlawful discrimination.

We are all responsible for conducting ourselves to help the organisation provide equal opportunities in our services, products and employment, and to prevent bullying, harassment, victimisation and unlawful discrimination.

We expect all colleagues to take responsibility for their words (both verbal and written) and actions – this includes microaggressions. Microaggression as defined by the Oxford Dictionary is a 'statement, action, or incident regarded as an instance of indirect, subtle, or unintentional discrimination against members of a marginalized group.' Microaggressions perpetuate stereotypes and cause harm to colleagues and our culture.

There are many types of microaggressions we have listed a few examples below:

- Negatively comparing a marginalised community or person from a marginalised community to a non-marginalised community e.g. 'you don't look gay'
- Speaking over or continuously interrupting a person from a marginalised community
- Not acknowledging or ignoring a person or people from a marginalised community's contribution
- Treating a person from a marginalised community differently to a person from a non-marginalised community e.g. asking to touch a black person's hair or asking to touch a pregnant person's stomach
- Dismissing the experience of people or a person from a marginalised community e.g. 'saying there is no such thing as racism'

To help make our culture inclusive, if you unintentionally cause someone offence, then we suggest you take the following steps:

Reflect & Listen: Reflect on your actions or words and listen to any feedback, ask for clarity about any specific things that contributed to the situation if you are unsure. We understand it can feel uncomfortable, we all have an opportunity to learn from every experience and commit to positive change.

Apologise & Learn: Apologising to the individual that has been excluded or discriminated against as soon as possible, explaining to anyone present that your actions were not considered or helpful and how you are committed to positive change. Learn from the experience and find resources and support to help should you need.

All employees should understand they, as well as the City & Guilds Group, can be held legally liable for acts of bullying, harassment, victimisation and unlawful discrimination, in the course of their employment, against fellow employees, customers, suppliers and the public.

We ask that all colleagues take their responsibility seriously in their own conduct and reflect on their behaviours that may contribute to discrimination, harassment, bullying or excluding individuals, either consciously or unconsciously. **This also means that colleagues must take appropriate action where they witness or experience bad behaviour or practices that do not fit with our cultural aspirations.**

Examples of appropriate actions include but are not limited to:

- Speaking directly to the individual that has contributed to a colleague feeling excluded or discriminated against (in the moment or as soon as possible) using phrasing like – 'I noticed you/ when you said /did [describe situation], it made me feel [describe impact] that's not in line with our culture and values, can we reflect/discuss a [describe a different way of acting/progressing or resolving situation].
- Speaking to your line-manager and agreeing and acting on the best approach to resolve the issue and address the person and their behaviour. Where the issue is the line manager then employees should either raise it with their managers manager or follow the steps below.
- Speaking to your I&D champion or LFG or Group Employee Forum representative, or Trade Union representative where relevant and agreeing and acting on the best approach to resolve the issue and address the person and their behaviour.
- Speak to a trusted colleague within the People function who can help to advise and support on appropriate actions.

This commitment includes training for all employees about their rights and responsibilities under the diversity and inclusion policy. [Learning content and training can be found on Kite.](#)

COMPLAINTS

We take seriously all complaints of bullying, harassment, victimisation and unlawful discrimination by fellow employees, customers, suppliers, visitors, the public and any others in the course of the organisation's work activities.

It is hoped that matters relating to non-serious complaints can be handled informally, at least in the first instance, and indeed can be resolved informally. The intent of dealing with issues informally is not to undermine how seriously we take this but to provide employees more avenues and opportunities to speak up.

Where this approach is not appropriate or employees want more support, issues will be dealt with formally in line with business areas policies and local Grievance or Complaints procedures. For example, in the UK there is both a Grievance Policy, Anti-bullying and Harassment policy and Whistleblowing that provides mechanisms for complaints. The outcome to any complaint or consequence to the individual/s who have not behaved in line with this policy can be found within the local relevant policies (listed above and [linked to here](#)).

Employees who have a complaint may wish to contact their HRBP, Group Employee Forum or LFG Reps, Trade Union representative (where relevant), I&D Champion or a trusted employee with their concerns. Any employee who feels that the treatment they have received is not in keeping with our policy has a right to register a complaint under their local Grievance and/or Anti-Bullying and Harassment Policies.

Employees must not be intimidated, discriminated against or treated differently for raising a concern, complaining or assisting in an investigation. If this happens it could amount to victimisation which is unlawful within the terms of the relevant legislation and goes against this policy.

COMMUNICATION AND CONSULTATION

The organisation will:

- establish key lines of communication across the business through consultation with key stakeholders (such as business leadership teams, engagement groups listed below);
- undertake an audit of existing communications channels so that compliance and inclusiveness are assured;
- ensure that communication imagery and graphics are inclusive, and reflect and reinforce the words within the documentation;
- ensure that group communications reinforce the inclusive messages and become mainstreamed into day-to-day processes; and
- communicate and celebrate the organisation's successes in diversity.

We have several avenues of communication and consultation in place that we will engage with. These include but are not exhaustive too:

- Inclusion and Diversity Champion Network
- Community Support Groups
- Group Employee Forum and Local Feedback Groups
- Trade Unions – where relevant and recognised across the Group

INCLUSION AND DIVERSITY BOARD

The I&D board is made up of representatives of Community Support Groups (CSGs), representatives must proactively represent their community through garnering feedback as required. The board must be comprised of diverse views and lived experiences (e.g. from different community support groups). For [more information on our CSGs](#) or the [Terms of Reference](#) see our [I&D pages](#).

The board acts as an I&D consultative body and advisory/discussion board to discuss and review core issues, products and services and strategic business decisions especially when relating to or impacting on I&D.

The board will meet typically on a quarterly basis and will be chaired by the Chief Executive Officer (or if necessary, an appropriate member of the People team e.g. the Inclusion & Diversity lead or Chief People and Customer Officer). At least one Trustee will typically attend the quarterly meetings.

The board can invite guests (both internal and external to attend as required and as appropriate – for example trustees or industry experts).

The board will also meet adhoc to discuss serious complaints or issues that colleagues or customers have raised that directly or indirectly impact on our commitment to creating an inclusive culture.

The board will not discuss individuals or personal complaints that are confidential but may review the context and recommendations of any formal complaint to ensure learning and remedies are put in place.

PROTECTED CHARACTERISTICS

The UK Equality Act 2010 legally protects people from discrimination in the workplace. In the UK it is illegal to discriminate against anyone because of these 'protected characteristics' -

- Age
- Disability
- Gender reassignment / Gender Identity
- Marriage and civil partnership
- Pregnancy and maternity
- Race (including colour, nationality, and ethnic or national origin)
- Religion or belief
- Sex
- Sexual orientation

We recognise local legislation may supersede this legislation but we do expect all of our colleagues to respect these characteristics in working practice and in the way they represent the Group.

EMPLOYEE ASSISTANCE PROGRAMME

The [Employee Assistance Programme \(EAP\)](#) is an outsourced service provided by a third party, covering a range of topics with support, guidance and advice to help you with any issues which are affecting you either at home or at work.

- For anyone dealing with racism or discrimination, the EAP counsellors can provide in the moment support, or arrange structured counselling.
- For any employees who need support for trans gender or gender realignment related issues, our EAP can provide in the moment support via the helpline. Health Assured have been proud members of Stonewall for over 3 years and through the helpline provide emotional

support and practical guidance. Health Assured offers a fully inclusive service that is LGBTQ + friendly and affirmative.

- Health Assured are a committed member of the Race at Work Charter, which includes having their own colleague run BAME network and employs a diverse workforce with broad experience as a result. Our EAP have affiliate counsellors within their network who are from a Black, Asian or Minority Ethnic background or have experience of working with Minority Ethnic communities. They have over 1600 counsellors across their network from different backgrounds, religions and ethnicities.

POLICIES & RELATED INFORMATION

- **City & Guilds Institute Policies** – [Please use this link](#)
- **Kineo UK policies** – [Please use this link](#)
- **Intertrain and Gen2 – Learner I&D Policies:** Please speak contact your HRBP for information as to where policies or further support is located.

The diversity and inclusion policy is fully supported by senior management and has had full engagement with our trade unions, Group Employee Forum, LFG's and I&D Champion Network as at March 2021.