



FOR THE FUTURE
**COOL BLUE
COLLEGE**

**Equality & Diversity
Policy**

Form: CP-034

Revision: 00



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Equality & Diversity Policy

Introduction

Cool Blue College operates a policy which recognises that all individuals have a right under the Equality Act 2020, to a working and training environment which is free from discrimination, where equality of opportunity is provided regardless of colour, race, ethnic origin, sex or sexual orientation, age, marital status, disability, or any other criteria.

This policy applies to recruitment selection, training, employment, apprenticeships, ongoing development, discipline, and dismissal. This policy applies to both staff and learners.

All Cool Blue College's employees, learners, associates, and partner organisations including, but not exclusive to employers, subcontractors and suppliers will be made aware of this policy, and are required to actively support and assist us in the implementation of the same.

The director of Cool Blue College is the representation for Equality and Diversity, the director has assumed overall responsibility for ensuring this policy is monitored, reviewed, and updated. Actions required to achieve its effective implementation are addressed in the company's procedures and practices.

Cool Blue College will take any reasonable steps, including disciplinary actions, termination of contracts etc to enforce this policy.

Any connected party i.e., employee or apprentice who avers that they have been discriminated against have the right to make a complaint in accordance with the complaints and grievance policy. The company ensures that such complaints relating to discrimination (including dignity at work) will be handled as sensitive as possible with all speed.

The full implementation of this policy as our basic standard will ensure that all employee, learners etc are given the opportunity to reach their full potential whilst the company seeks to work towards the CMAs Equality, Diversity and Inclusion Strategy 2020-2024.

This policy will be reviewed on an annual basis to ensure continued and effective implementation.

Definitions and examples of all **bold** words can be found in the Glossary in Appendix 1.

1. Policy Statement

Cool Blue College is committed to **equality** and **diversity** in every aspect of its activities and aims to provide an environment where all individuals have the opportunity to achieve their full potential with a feeling of self-esteem.

Cool Blue College encourages and supports the development of an environment in which:

- Peoples' ability to achieve their potential is not limited by **prejudice** or **discrimination**
- There is respect for and protection of each individual's rights
- There is respect for the dignity and worth of each individual
- Each individual has an **equal opportunity** to participate

Cool Blue College believes that its purpose, aims and values will be best achieved through the recruitment of employees and learners from the communities that we serve, and which influence our organisation. Cool Blue College will encourage each individual to make full use of their talents and skills.

In our commitment to promoting **equality of opportunity** we will not accept **prejudice** or **discrimination**. An environment where **equality of opportunity** exists is more rewarding for employees and learners and will enhance performance and achievement.

2. Purpose

The purpose of this policy is to establish clear guidance regarding **equality** and **diversity**. The guidance will be applicable to all employees and potential employees, learners and potential learners, contractors, associates, employers and partner organisations and visitors.

Cool Blue College believes that all forms of **prejudice** and **discrimination** are unacceptable. In recognition of the fact that **prejudice** and **discrimination** can take a variety of forms, depending on the group against whom they are directed, the Equality and Diversity Policy addresses issues specific to discrimination on the grounds of:

- **Age**
Cool Blue College recognises that people can develop throughout their lives and that an individual's life experience can add value to their role as either an employee or a learner.
- **Disability**
Cool Blue College will make reasonable adjustments to arrangements, facilities and support to ensure that each individual can actively participate in all aspects of their employment or learning.
- **Sex**
Cool Blue College provides a supportive environment for men and women, actively encouraging the development of individuals in non-traditional employment.
- **Race**
Cool Blue College seeks to create a working and learning environment based on positive relationships between members of different racial groups.

- **Religion**
Cool Blue College respects the rights of individuals to hold different religious beliefs.
- **Sexual Orientation**
Cool Blue College believes that a person's sexuality does not have any bearing on their ability or suitability for employment or learning opportunities.
- **Gender Reassignment**
Cool Blue College believes that because someone has undergone or is in the process of undergoing gender reassignment it does not have any bearing on their ability or suitability for employment or learning opportunities.
- **Pregnancy & Maternity**
Cool Blue College respects the rights of employees and learners during periods of pregnancy and maternity.
- **Marriage & Civil Partnership**
Cool Blue College respects the rights of those in marriages and civil partnerships under the Equality Act.

Cool Blue College will not tolerate any behaviour that would result in any individual:

- Being given less favourable treatment based on one or more of the above protected characteristics (**direct discrimination**).
- Being disadvantaged or treated less favourably, in relation to one or more of the above protected characteristics, because of requirements that are not related to the job or course of learning (**indirect discrimination**).
- Being given less favourable treatment because they are associated with another person with a protected characteristic. (e.g., the mother of a disabled child) (**associative discrimination**).
- Being given less favourable treatment because others think they possess a particular protected characteristic (**perceptive discrimination**). This applies even if the person does not actually possess that characteristic.
- Being humiliated, embarrassed, ridiculed or intimidated based on one or more of the above protected characteristics, or being subject to behaviour they believe to be offensive to them or which they find offensive even if it is not directed towards them personally (**harassment**)*.
- Being harassed by people not directly employed by Cool Blue College (**harassment by a third party**).
- Being treated less favourably because they have made or supported a complaint under The Equality Act legislation.

* Please refer to the Bullying and Harassment Policy for more detailed guidelines about harassment and bullying.

3. Promotion of Equality & Diversity

Cool Blue College will promote **equality** and **diversity** through:

- Employee and learner inductions
- Training
- Analysis and evaluation of data for both employees and learners by age, disability, gender, race, and religion
- Supportive workplace practices

Introductions & Training

Cool Blue College recognises the need for all employees and learners to:

- Be aware of the behaviours that express **discrimination**.
- Know that discrimination is not restricted to groups in society.
- Be aware of the ways in which assumptions and **oppression** can be built into society and organisations.
- Be aware of **stereotyping** or **prejudice** in the content and delivery of their work.
- Be prepared to challenge discriminatory behaviour or attitudes.

All induction programmes will include an introduction to **equality** and **diversity**.

Analysis & Evaluation of Data

Cool Blue College is committed to the collection of statistics and analysis of data to allow ongoing monitoring of employees and learners.

Employee and learner profiles will be developed in relation to age, disability, gender, race, and religion. Trends will be identified and explored to guarantee the removal of any barriers caused by the company's policies or practices.

Supportive Workplace Practices

Cool Blue College believes that its commitment to **equality** and **diversity** should be visible in every aspect of its work. All relevant policies, procedures and practices will be written in such a way to promote fairness and equality for all.

4. Every Learner Matters

In line with the green paper 'Every Child Matters' Cool Blue College has implemented the five key outcomes for children and young people's well-being into its practices, at the same time expanding them to cover all learners. The outcomes are:

- Being Healthy
- Staying Safe
- Enjoying and Achieving
- Making a Positive Contribution
- Achieving Economic Wellbeing

Cool Blue College believes that a strong commitment to equality and diversity supports and enhances the five key outcomes of 'Every Child Matters'.

5. Responsibilities

In your role with Cool Blue College you have a duty to:

- Co-operate and comply with the measures set out in this policy;
- Report any discriminatory action, including bullying and harassment.

You must not:

- Encourage or allow others by omission to carry out any discriminatory act.
- Induce or attempt to induce others to practice discrimination.

Employees, Contractors, Associates, Employers, Partner Organisations & Visitors:

- You are responsible for ensuring that:
- You attend Equality and Diversity training as required.
- You challenge or report inappropriate behaviour, including harassment or bullying, whether intentional or unintentional whenever it occurs.
- You act in accordance with policies designed to combat discrimination and prejudice.

Learners

- You behave with respect toward all members of Cool Blue College, including other learners.
- You adhere to the expectations set out in this policy.
- You do not encourage prejudice or discrimination.
- You report to your tutor/assessor or another member of Cool Blue College any incidents of harassment, bullying, prejudice or discrimination witnessed during your learning.

Taking Action

- **Informal Action** where you raise the issue informally and privately with the person(s) responsible for the unacceptable behaviour. This will make sure that person is aware of the effect of their actions as well as making it clear that their actions are not acceptable. If you feel uncomfortable or reluctant to approach the individual yourself, you could ask a trusted colleague or manager to support you.
- **Formal Action** should be used where informal action hasn't worked, or if the informal approach is not an option. The issue should be raised with your manager or your tutor/assessor; employees can use stage 1 of the formal grievance procedure to help you do this. If the person you're complaining about is your manager or your tutor/assessor, you will need to raise it with their line manager; employees can use stage 2 of the formal grievance procedure. Alternatively, if the circumstances are very difficult you may choose to use the Whistle-blowing Policy.

Whenever a complaint of discrimination is received the company will:

- Take the complaint seriously.
- Carry out an immediate investigation into the complaint.
- Take steps to make the investigation fair, objective and independent by allocating the investigation to a person who is not involved in the complaint.

Where an investigation identifies that there has been a case of discrimination the investigation will cease and a disciplinary investigation under the Disciplinary Procedure will take over and will be dealt with at the appropriate stage of the procedure.

Equality	Treating people fairly and ensuring everyone is given a fair chance.
Diversity	Diverse means different and varied; diversity welcomes difference rather than ignoring it.
Prejudice	Prejudice means to be biased, to have a preconceived opinion.
Discrimination	Discrimination is the unfair or unequal treatment of an individual or group
Equal Opportunity / Equality of Opportunity	Equal opportunity means that every person should be given the same chance to improve their life; at Cool Blue College this relates to learning and employment opportunities.
Direct Discrimination	When you are treated less favourably than someone else in the same situation based on a personal characteristic, for example because of your age, sex/gender, race, disability, religion, sexual orientation. Example - A woman being denied a promotion because she is pregnant
Indirect Discrimination	Where there are rules or conditions that apply to everyone but affect one group of people more than others without good reason. Example - A company rule that says all women must wear knee length skirts could exclude women whose religion requires them to wear full length clothing.
Associative Discrimination	Direct discrimination against someone because they are associated with another person with a protected characteristic. (E.g., the mother of a disabled child).
Perceptive Discrimination	This is direct discrimination against an individual because others think they possess a particular protected characteristic. It applies even if the person does not actually possess that characteristic.
Harassment	Unwanted conduct that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment. Refer to the Bullying and Harassment Policy for examples of the behaviours that would be classed as harassment.
Bullying	Offensive, intimidating, malicious or insulting behaviour; an abuse or misuse of power through means intended to undermine, humiliate, denigrate, or injure the recipient. Refer to the Bullying and Harassment Policy for examples of the behaviours that would be classed as bullying.
Victimisation	Where a person is treated less favourable because they have made, or intend to make, a complaint of discrimination. Example A young apprentice has been bullied by her colleagues. She complains to her manager about the bullying, but the manager tells her colleagues, and they all start to ignore her. She then loses her apprenticeship with the company because she is seen as a troublemaker
Oppression	The misuse of power over people.
Stereotyping	To make everything or everyone the same. When we stereotype people, we make them all the same based on one characteristic or assumption about the group.

Ethical Policy

Introduction

This policy has been created to provide a framework & guidance on the company's approach to achieving and maintaining good business behaviour using sound ethical conduct.

It serves to ensure that all employees are aware of their individual and collective responsibilities with regard to the company's ethics and to emphasise our employees, apprentices, and customers' expectations to be treated fairly and by good business practice.

1. Background

Mark Clelland, Managing Director of Cool Blue College, is ultimately responsible for Cool Blue College (hereafter referred to as 'the company') ethical policy and procedures and their implementation.

In all the company's operations it is important to retain a set of core values and approaches to the process of doing business. The company recognises its obligations to all those with whom it has dealings. The reputation of the company and the trust and confidence of those with whom it deals are among its most vital resources, and the protection of these is of fundamental importance.

To this end, the company demands and maintains high ethical standards in carrying out its business activities. Corrupt practices will not be tolerated. The company endeavours to be a good corporate citizen, taking account of the economic, social and environmental impact of its business and aiming to maximise the benefits and minimise any negative impact of its operations. The company is committed to high ethical standards in its business dealings to ensure the integrity of its employees and the organisation is maintained.

This document should be used alongside all of the company's existing policies (including Environmental, Equal Opportunities, Complaints, Whistleblowing and Quality Management statements).

This policy cannot address or anticipate all likely ethical dilemmas. It is intended to guide company staff in how to act with integrity, good conscience, and judgement at all times.

2. Relationship with Clients/Delegates

The company believes that integrity in dealings with clients/delegates is a prerequisite for a successful and sustained business relationship. This principle governs all aspects of the company's approach to its clients/delegates. Mutual trust and confidence between the company and its clients is vital. All company employees should strive to consistently deliver service excellence and value for money, meeting customers' expectations and anticipating their changing requirements.

Untruths, concealment, and overstatement will be avoided in all advertising and other public communications. All marketing and promotional materials will be relevant, accurate at the time of publication, not misleading, accessible, and designed to help potential clients/delegates make informed decisions.

No employee may give money or any gift of significant value to a client/delegate. Nor may any gift or service be given which could be construed as being intended as a bribe.

The company accords the same degree of confidentiality to confidential customer information as it does its own confidential information.

Maintaining the highest standards of training and learning are fundamental aims of the company. The company strives to ensure that its training programmes provide a high quality and challenging educational experience and employs fair, rigorous, and transparent delegate assessment procedures. Plagiarism and other forms of academic misconduct will not be tolerated among company staff or delegates.

Prior to the commencement of learning/training activities the company will strive to determine if the potential delegates have any learning or other disabilities which may impact upon their learning experience and will make appropriate provision. The company will also ascertain the delegate's level of proficiency in the programme language (usually English) and take measures accordingly.

Relations with delegates will be based on respect for the dignity of the individual and fair treatment for all. The company is committed to equality, diversity and inclusiveness and will not tolerate sexual, physical, or mental harassment (including bullying) of delegates. Consensual relationships between company staff and delegates should be appropriately declared.

The company has policies and procedures in place to respond to delegate/client complaints and appeals. These procedures are designed to ensure that delegates/clients can raise matters of concern to them without fear of disadvantage and in the knowledge that privacy and confidentiality will be respected.

3. Relationship with External Suppliers

All suppliers are entitled to fair treatment and the company aims to develop relationships with its suppliers based on mutual trust. It is therefore company policy to pay suppliers on time and in accordance with agreed terms of trade.

The receipt of gifts or favours by employees can give rise to embarrassing situations and may be seen as an improper inducement to grant some concession in return to the donor. The following principles should be observed:

- Gifts or favours must not be solicited.
- Gifts of money must never be accepted.
- Reasonable small tokens and hospitality may be accepted provided they do not place the recipient under any obligation, are not capable of being misconstrued and can be reciprocated at the same level, and the employee's immediate superior is made aware of the same.

Any offer of gifts or favours of unusual size, or questionable purpose should be reported immediately to the employee's supervisor or manager.

4. Relationship with External Suppliers

The company will compete vigorously, but honestly. The company believes service excellence to be the best way of enhancing its reputation. Whilst fair comparison between the company's strengths and competitors' weaknesses may be made, the company will not engage in damaging competitors' reputations either directly or by implication, misrepresentation, or innuendo.

In any contacts with competitors, employees will avoid discussing proprietary or confidential information.

5. Human Rights

The company supports the principles of the United Nations Universal Declaration of Human Rights and is committed to upholding these principles in its policies, procedures, and practices. Respect for human rights is, and will, remain integral to the company's operations.

The company will endeavour to work with business partners who conduct their business in a way that is compatible with its own policies of respect for human rights and ethical conduct. The company will work with clients/delegates to ensure that contractual requirements do not infringe human rights.

The company will take measures to ensure that the work of its employees does not compromise internationally accepted human rights conventions.

6. The Environment

The company will conduct its business with respect and consideration for the environment. It will strive to minimise its environmental impact through the management of waste, vehicle emissions and energy consumption.

7. Local Communities

The company supports and encourages knowledge transfer opportunities and works in collaboration with private, public, and charitable organisations and bodies to achieve these aims. In addition, the company is committed to playing an active and positive role in the communities in which it operates. The company conducts business with respect and consideration for the good of local communities, taking steps to minimise any disturbance as a result of operations.

8. Compliance with the Law

The company will comply fully with all relevant national laws and will act in accordance with local guidelines and regulations, including those which are industry specific, governing its operations.

9. Accounting Standards and Records

All accounting documentation must clearly identify the true nature of business transactions, assets, and liabilities in conformity with relevant regulatory, accounting and legal requirements. No record or entry may be false, distorted, incomplete or suppressed.

10. External Reporting

The company may be required to make statements, or provide reports to regulatory bodies, government agencies or other government departments. Care should be taken to ensure that such statements or reports are correct, timely and not misleading. Senior management must be made aware of any sensitive disclosure before it is made.

Care must also be taken when making statements to the media, that information given is correct and not misleading. Enquiries from the media should be referred to company media relations experts, and statements should only be made by designated spokespersons.

11. Relationship with Company Employees

The company is committed to optimising individual and organisational performance through employing the best people at all levels and creating an environment in which they want to and can contribute fully to the company's success. To achieve a working environment in which team spirit and commitment to the goals and values of the company are maintained, the company will ensure that individual employees are treated fairly and with dignity and respect.

In dealing with its employees, the company will act in compliance with national regulatory requirements; employers' obligations to employees under labour or social security laws and regulations must also be respected.

Declaration on Fundamental Principles and Rights at Work

In accordance with local legislation and practice the company will respect freedom of association and the right to collective bargaining. Employment will be freely chosen with no use of forced or child labour, and the company will not discriminate on the basis of gender, colour, ethnicity, culture, religion, sexual orientation or disability.

12. Harassment

Harassment can be defined as unwanted behaviour, which a person finds intimidating, upsetting, embarrassing, humiliating or offensive. Conduct involving the harassment (racial, sexual or of any other kind) of any employee is unacceptable. Should an employee believe that he or she has been harassed the matter should be raised with the relevant manager who will arrange for it to be investigated without delay, impartially and confidentially.

13. Equal Opportunities

The company values all employees for their contribution to the business and their opportunities for advancement will be equal and not influenced by considerations other than their performance, ability, and aptitude. Employees will also be provided with the opportunity

to develop their potential and, if appropriate, to develop their careers further with the company.

14. Health & Safety

The company places the highest priority on promoting the health and safety of employees whilst at work. The company will constantly review the effectiveness of its methods of operation in this regard, and will ensure that all employees receive appropriate health and safety information and training.

The company recognises that there are risks associated with carrying out any business activity. Senior Management is responsible both for ensuring that policies and procedures are in place to manage risks and for complying with those policies and procedures. Employees should ensure that they are aware of the risks associated with their activities, and that they comply with policies and procedures in place to manage those risks.

15. Confidential Information

Employees must not make use of confidential information obtained through their employment for personal gain, nor disclose such information to any third party during or after their employment. 'Confidential information' is either information that has been specifically described as being confidential or is otherwise obviously confidential from the surrounding circumstances. It does not include information in the public domain or information which the individual concerned is required by law to disclose.

16. Conflicts of Interest

Every employee has a duty to avoid business, financial or other direct or indirect interests or relationships which conflict with the interests of the company, or which divides his or her loyalty to the company.

Employees must avoid situations where appearance of business impropriety exists, even though the circumstances might not otherwise specifically violate this code of conduct or where specific laws, or regulations do not apply.

17. Implementation / Review

The company's commitment to this ethical policy is considered as fundamental to its long-term sustainability and success. This will be demonstrated through the company's systems of training, adherence and accountability regarding performance.

Strict adherence to these principles and supporting policies is a condition of employment with the company. Senior management must ensure that staff understand this framework and the values that underpin it and are informed of the requirements relating to their job. Any action by an employee which deliberately or recklessly breaches this ethics policy may result in disciplinary action, including dismissal.

Compliance with this policy will be monitored on a regular basis through mechanisms such as internal/external audit, ongoing management reporting and information received via 'whistle-blowing.'

Sexual Orientation Policy

This policy forms part of our Equality and Diversity policy including Equal Opportunities, Anti-bullying, Relationship and Sex Education (RSE). It sets out in more detail on approach to LGBT people and issues in the line with the Education and Inspections Act 2011 and the Equality Act 2010:

Education and Inspection 2011

Cool Blue College have a duty to eliminate discrimination on the grounds of sexual orientation and gender reassignments. This includes tackling HBT bullying. Training is also required to advance equality of opportunity and foster good relations. This means that training should go beyond tackling HBT bullying and take proactive steps to promote respect understanding of LGBT people and issues.

Cool Blue College

- To provide an inclusive environment in which LGBTG learners and staff are valued and respected.
- To promote understanding of and support the needs of LGBT pupils and staff.
- To usualise LGBT awareness and issues through the provision of an inclusive curriculum
- To monitor and tackle HBT language and bullying.

Cool Blue College seeks to achieve these aims...

- By ensuring that training policies and practices are inclusive and supportive of LGBT people and explicitly state that HBTG language and bullying are unacceptable.
- By providing training to staff in supporting LGBT- inclusive curriculum and tackling HBT language and bullying
- By providing support structures and information/ resources of LGBT people on LGBT issues and support services.
- By providing learners with LGBT- inclusive Relationships and Sex Education (RSE), opportunities to discuss gender identity and sexuality, and including LGBT people and themes in the PSRE and wider curriculum where relevant.
- By providing multiple ways for learners to report HBT language and bullying monitoring (including through staff and learner surveys) and recording HBT language and bullying, as well as ensuring that pupils are aware that HBT language and bullying are wrong.
- By ensuring that the library contains books with LGBT themes and displays which celebrate diversity or tackle bullying are LGBT-inclusive.

Sexual orientation refers to people who are, or who are perceived to be, lesbian, gay or bisexual. Gender reassignments refers to anyone who is proposing to undergo, is undergone, or has undergone a process or part of a process, for the purpose of reassigning their sex by changing physiological or other attributes of sex.

The Employment Equality (age) Regulation of 2006 is now superseded by the Equality Act 2010. The main principles of which cover the listed points below but now incorporate age, disability, gender reassignment, marriage, civil partnership pregnancy and maternity, race, religion belief, sex, and sexual orientation.

Age Equality Policy

Introduction

Cool Blue College re-affirms its commitment to the principles of promoting age equality, preventing, and eliminating age discrimination in employment, admissions, and in its teaching, learning and research activities.

It will endeavour to ensure that no applicant for employment or study, member of staff, learner, or visitor, is disadvantaged or discriminated against on age grounds and that all are treated based on their relevant merits and abilities.

Intent and Purpose for the Prevention of Age Discrimination and Promotion of Age Equality

Cool Blue College aims to achieve this objective by actively monitoring and reviewing organisational processes and procedures at all levels, at regular intervals. The results will enable Cool Blue College to focus on the development and promotion of a range of age equality issues.

Induction and Training Programmes

Cool Blue College staff training will contain a range of training opportunities relating to the elimination and prevention of age discrimination and promotion of age equality.

Staff and learner induction programs will contain an equal opportunities module, which include age equality issues pertaining to promoting better understanding and awareness of age equality matters, including harassment and discrimination.

Management Development programs will incorporate programs on; decision making in terms of ensuring consistency and equality in recruitment and selection, selection for promotion, harassment, discrimination, and grievance handling.

Preventing Age Discrimination

To achieve an environment that is free from unlawful age discrimination, and which encourages everyone to contribute fully to the work of the organisation, Cool Blue College will endeavour to ensure that:

- Employment vacancies, where possible, are accessible to a broad range of age groups within the community through a variety of media.
- Impact assessments are conducted on age equality relevant functions.
- The collation of statistical information regarding the age profile of staff in relation to recruitment, employment and career progression will be maintained.
- The collation of statistical information relating to the admission and progression of learners, by age, will be maintained. Data will assist in the identification of teaching, learning and learner service issues that may require addressing.
- Information will provide details of issues that require further review and will assist in the development of the Cool Blue College Quality Improvement Plan.

Staff and learner procedures provide equal opportunities and are free from unlawful age discrimination in all areas pertaining to employment, study, and learning.

There is compliance to the anti-discrimination provisions as recommended by the Equality Act 2010.

Where Can I Make a Complaint or Claim Discrimination?

1. A complaint may be made in writing to Cool Blue College, whereby it will be allocated a unique reference number and within 2 working days of receipt acknowledgement will be sent indicating the person within Cool Blue College who will be dealing with the complaint.
2. Your complaint will then be investigated, and a reply sent within 10 working days detailing the findings.
3. Should you feel unhappy with the response provided by Cool Blue College you can appeal in writing to the Managing Director who will acknowledge receipt of your request within 5 working days.
4. A re-investigation will then commence, and all decisions will be reviewed. The findings will then be communicated in writing up to 28 days from acknowledgement of receipt of the appeal.
5. Referral to higher boards, such as Awarding Bodies and the Learning & Skills Council, will only commence should the findings of the Director's investigation be deemed unsatisfactory. Cool Blue College will then abide by the procedures identified by the appropriate higher authorities.

Monitoring

All received complaints will be reviewed on a quarterly basis. As part of the Senior Quality Review Meetings the number of complaints logged, and any observable trends will be discussed in detail and an appropriate plan of action to rectify the situation will be created.

Employment (Religion or Belief) Policy

Introduction

Whether at work or in our private lives, we will encounter people with different religious beliefs. The UK is increasingly multi-cultural and in the 2021 Census 61% of respondents identified themselves as having a religious affiliation, and 25.7% of people identified themselves as having no religious affiliation.

The five most popular religions in the UK during the 2021 Census were Christianity, Islam, Hinduism, Judaism and Sikhism. Legislation now makes discrimination, victimisation, and harassment on the grounds of religion or belief unlawful.

It is not practical for everyone to become experts in the beliefs, rituals, traditions, and history associated with all world religions. This policy is intended to provide helpful and practical advice to employees and learners so ensure that no one is discriminated against on grounds of religion or belief.

Cool Blue College is committed to providing a respectful environment for anyone who may seek to give their religion or belief external expression. It acknowledges that religion is both belief and practice. All Cool Blue College employees and learners should respect the opinions and human rights of others.

It is equally important to recognise and respect those people holding atheistic or agnostic beliefs. Their religious views and religious non-practice are to be given an equivalent level of respect and discrimination should not be made against them on religious grounds.

It is important also to remember that all beliefs (and none) are practiced by from people from different backgrounds and traditions and with varying degrees of adherence.

What is “Religion or Belief”?

For the purposes of the policy “Religion or Belief” is defined from a legal perspective rather than a philosophical one. The main legislation regarding Religion or Belief is the Employment Equality (Religion or Belief) Regulations 2003. Religion or Belief is not explicitly defined in these Regulations.

It will be for the courts to decide what is covered by the legislation. The courts will decide which particular groups would be protected by the legislation by considering the presence of the following:

- Collective worship
- A clear belief system
- A profound belief affecting the way of life or view of the world.

For the purposes of the Cool Blue College policy, all major religions are covered, including the list detailed below:

- Baha'i
- Buddhism
- Christianity
- Hinduism

- Islam
- Jainism
- Judaism
- Paganism
- Rastafarianism
- Sikhism
- Zoroastrianism

This list is not exhaustive and other religions or beliefs may also be included. Cool Blue College will consider the same criteria used by the courts if there are any disputes about what is considered a religion or belief for the purposes of this policy.

The Policy also covers Humanists, and those holding atheistic or agnostic beliefs.

If there is any dispute or concern about whether a particular religion or belief would be covered by this policy, the Director can provide further advice.

Practical Steps to Take

There is substantial diversity within and between religions and beliefs. It is not practical for everyone to become experts in the beliefs, rituals, traditions, and history associated with all world religions.

Treating people fairly means taking account of these differences rather than treating everyone the same. If you are unsure about a particular issue, ask the individual concerned.

There is no reason for them to be offended if your question is prompted by a genuine desire to make things right. Having a better understanding of their beliefs and practices will help you to facilitating their adherence to them.

Requests/representations from people with less well-known religions or beliefs should be treated with the same sensitivity as those with more well-known or mainstream religions or beliefs.

Managing Staff – Dealing with requests for time off work

Requests for time off work that relates to religion or belief will usually fall into two categories: time off to attend prayers and time off to attend a religious festival.

When dealing with requests for time off, take the following into account:

- All staff, regardless of their religious belief or non-belief are required to work in accordance with their contract.
- Managers should try, wherever it is reasonably practicable and subject to the needs of the service/school, to be flexible with work schedules and holidays for individuals wishing to observe religious festivals and holy days.
- Dates for some religious festivals are approximate as they are based on lunar observation and may change from year to year, or according to different doctrines, or local customs. A religious calendar can be found at <http://www.interfaithcalendar.org/>

- Managers should be prepared to make reasonable adjustments to working arrangements as long as they don't cause undue disruption, to enable staff to participate in religious prayers or festivals. Such adjustments could include approving annual leave, time off in lieu, unpaid leave, use of flexitime and/or flexible working arrangements.
- Sometimes there are religious obligations in relation to birth, coming of age, marriage and death, which can vary according to religion, culture and position in the family. Managers are encouraged to be sympathetic to requests on these grounds and try to accommodate them, wherever it is reasonably practicable to do so, subject to the needs of the service. Arrangements could also include those referred to in the previous bullet point.

Managing Learners – Dealing with requests for time off study

For learners who wish to observe the requirements of their religion and pray at certain times of the day or attend religious festivals:

- They should, wherever possible, fulfil their obligation to pray either before or after lectures/classes.
- Missed learning opportunities resulting from participation in prayer and religious festivals must be made up by the learner.
- Handouts for lectures normally distributed in class, should be made available to the learner.

Organising Catered Events

Shared food and hospitality play an important part in many religions. However, because certain foods are forbidden in certain religions, catering to accommodate everyone's needs can be complex. The following guidance may be helpful when organising events at which food and drink are available:

- It is good practice to ask attendees if they have any special dietary requirements in advance. You can discuss their requirements in detail if necessary.
- Careful labelling of all dishes will help to avoid anxiety about accidentally eating forbidden foods.
- The best way to cater for a multi faith event so that the maximum number of people can share in the food is to make it fully vegetarian, with some vegan options, and to label each dish.
- For strictly Orthodox Jews, it may be necessary to bring in separate meals which have been prepared in a kosher kitchen. Kosher foods include kosher wine, bread, and cheese as well as meats. Such food and drink are marked with a hechsher (seal) which certifies it is kosher. NB kosher law requires separate plates for dairy and meat food.

- Muslims will wish that, ideally, their food has been prepared in a kitchen where the utensils and contents have not been in contact with haram (forbidden) food. However, most Muslims are primarily concerned to ensure that any meat served is halal (permitted and slaughtered in accordance with Islamic law) and are generally happy to eat vegetarian food that has no animal fat or by-products used in its production.

When organising work functions and social, especially catered events related to work, try to consider potential conflicts between a member of staff's religious beliefs and his/her ability to engage in social activities related to work.

In many faiths, the consumption of alcohol is forbidden and there are also periods of fasting. Consideration should be given to a wide range of activities that will be inclusive for everyone. For example, checking that catered social events do not occur during Ramadan if there are Muslim members present.

Fasting

Try to be considerate when other employees are observing a fast and consider how you can support them. However, be careful not to place unreasonable extra burdens upon other workers which could cause conflict or claims of discrimination.

Employees observing a fast may request reduced lunch breaks. These requests should be considered bearing in mind the legal minimum of a twenty-minute break for every six hours worked.

Dress

Cool Blue College does not operate a formal dress code and the organization acknowledges that some people will wish to wear religious dress (including, for example, turbans, skullcaps, hijabs, the Sikh five Ks, and clerical collars).

The wearing of religious dress is permitted provided it is consistent with the organisations pursuit of its legitimate aims. Where a person is required to wear overalls, protective clothing or uniforms, sensitivity and flexibility should be shown and efforts made to accommodate the wearing of religious dress safely.

There are some circumstances where the wearing of religious dress by learners is discouraged by external bodies. Where this is the case, learners are expected to adhere to the dress codes and any local policies adopted by organisations in which they are working or studying.

Differences in style of communication

In some religions, followers may be expected to follow different rules with regard to their communication with others, for example depending upon their gender. For example, how you address a person, whether or not you shake hands or make eye contact.

Agree with the individual how they should be address and how they should address you. If you are not sure about any of these issues, ask the individual concerned and try to agree an approach which is mutually acceptable.

Language

Our workforce and learner base is diverse. We need to make sure that our language is relevant and sensitive. Be aware that using the name of a particular God as a swear word can and will cause offence to some.

Recruitment & Selection

Interview questions should be asked to check for skills and competences needed for the post.

Job interviews should not contain any questions enquiring about religious affiliation, or questions designed to reveal if religious requirements might conflict with workplace routines, or workplace schedules*.

If there is a need to specify the requirements of the job in relation to hours of work and any out of hour's arrangements these should be made clear to **all** learners, and they should **all** be asked if they are able to comply.

Shaking hands upon meeting interviewees or after an interview is commonly practiced in the UK. However, some people may find shaking hands unacceptable because of their religion or belief.

To avoid any embarrassing exchanges with learners, you could simply ask their permission to shake their hand. Remember that interviews are a daunting experience for any learner and an embarrassing or inappropriate exchange immediately prior to the interview could undermine their performance.

If learners choose not to shake your hand, it should in no way affect the decision-making process.

Freedom of Speech

The Code of Practice does not stifle lawful, legitimate criticism of, or debate about a religion or belief for academic purposes. However, it does take into account other legal obligations, for example, incitement to racial hatred would transgress the bounds of lawful speech.

Harassment

Harassment of any member of the community or visitors on grounds of religion or belief is not to be tolerated, nor is trying to justify harassment on grounds of gender, ethnicity, or sexual orientation.

The following behaviours are also unacceptable:

- Harassment because of a persons religious beliefs or non-belief.
- Using religion to justify harassment on the grounds of gender, ethnicity or sexual orientation.
- Coercion of others to comply with the requirements or doctrine of a religion, faith or belief system, or a particular interpretation of a religion, faith or belief system.
- 'Outing' (revealing a person's religion or belief without their consent, usually in Public).
- A person being told that they could not make their religious affiliation known when it is a key part of their identity.

Where can I make a complaint or claim discrimination?

1. A complaint may be made in writing to Cool Blue College whereby it will be allocated a unique reference number and within 2 working days of receipt acknowledgement will be sent indicating the person within Cool Blue College who will be dealing with the complaint. (See complaints procedure)
2. Your complaint will then be investigated, and a reply sent within 10 working days detailing the findings.
3. Should you feel unhappy with the response provided by Cool Blue College you can appeal in writing to the Managing Director who will acknowledge receipt of your request within 2 working days.
4. A re-investigation will then commence, and all decisions will be reviewed. The findings will then be communicated in writing up to 28 days from acknowledgement of receipt of the appeal.
5. Referral to higher orders, such as Awarding Bodies and the Learning & Skills Council, will only commence should the findings of the Director's investigation be deemed unsatisfactory. Cool Blue College will then abide by the procedures identified by the appropriate higher order.

Monitoring & Review

All received complaints will be reviewed on a quarterly basis by Cool Blue College, as part of the Senior Quality Review Meetings the number of complaints logged and any observable trends will be discussed in detail and an appropriate plan of action to rectify the situation will be created.

Race Equality Policy

Cool Blue College aims to promote race equality in all its operations, to celebrate the diversity of its staff and learner populations and to prevent unlawful race discrimination.

Monitoring & Review

The Race Relations Amendment Act, enacted in April 2001, placed new duties on public bodies, including higher education institutions, to prevent discrimination and promote good race relations between different groups. There is now a statutory obligation for Cool Blue College to have a Race Equality Policy and for progress on its implementation to be assessed in consultation with those most affected by it and published annually.

Progress on race equality within higher education has become increasingly important for a number of reasons:

1. The 1997 Dearing report recommended, "all institutions should identify and remove barriers which inhibit recruitment and progression for particular groups" and monitor and publish the progress towards turning equal opportunities commitments into realities within Higher Education.
2. The report 'Ethnicity and Employment in Higher Education' (Modood et al, 1997, of the Policy Studies Institute) summarised the findings of the most comprehensive survey to date examining the position of black and minority staff in academic and related employment and the existence and outcome of racial equality policies in Higher Education Institutions. Some of the main findings of the report are summarised in note 1 of the Appendix to this policy.
3. The report on the Inquiry into the Death of Stephen Lawrence published in 1999, identified institutional racism as a common feature of most public institutions including educational establishments. It reiterated that all educational establishments are expected to create effective learning environments where racial differences are seen positively, where negative stereotypes and harassment are challenged, and teaching materials are free from discrimination and stereotyping.

Purpose of the Race Equality Policy

The purpose of this policy is to promote diversity, fairness, justice and equality of access and opportunity, identify any barriers to progress, expose inequalities and their underlying causes and take remedial and preventative action.

The creation of a Race Equality Policy will assist Cool Blue College to identify its aims and aspirations for racial equality and how this will be achieved, at an individual and corporate level.

This policy sets out Cool Blue College's existing commitments and priorities for the coming year, after which, progress will be reviewed and also identifies longer-term goals for the next four years.

Cool Blue College is reviewing its Equal Opportunities Policy, of which race equality is an integral part. This Race Equality Policy and Cool Blue College's Equal Opportunities Policy are intended to complement each other.

Definitions of Racism

Cool Blue College recognises that opposing race discrimination necessitates an acceptance of the existence of racism within society, an understanding of how it operates and the knowledge, ability and confidence to challenge this in oneself and others, and within the system and culture in which we live and work.

Racism is a complex phenomenon. It is prejudice combined with power which informs attitudes and actions (not necessarily consciously), which can then become embedded in organisational structures and which subordinates or excludes a person or group because of their colour, culture, race, nationality or ethnic differences.

The manifestation of racism is complex because prejudice and stereotyping can take different forms when applied to different groups. Racism can be both personal and institutional, overt or subtle, intentional or unintentional. The Stephen Lawrence Inquiry defined institutional racism as:

" the collective failure of an organisation to provide an appropriate and professional service to people because of their colour, culture, or ethnic origin. It can be seen, or detected in processes, attitudes and behaviour, which amount to discrimination through unwitting prejudice, ignorance, thoughtlessness and racist stereotyping, which disadvantage minority ethnic people."

The charge of institutional racism does not mean that all or most of an institution's members or leaders are racist; rather, it describes the environment in which cultural, institutional, professional and traditional assumptions, practices and structures (both formal and informal) can create the context in which discrimination occurs.

This is demoralising and oppressive for minority ethnic people and has effects similar to discrimination, even where acts of blatant discrimination are rare.

A noteworthy, although by no means exhaustive, list of manifestations of institutional racism is detailed in note 2 of the Appendix to this policy.

Cool Blue College was founded on libertarian principles, and freedom from prejudice. Success in education has not always led to success in the labour market for black and minority ethnic people, but in taking action for equal opportunities and race equality in both employment and the provision of education, Cool Blue College aims to achieve a true meritocracy.

Cool Blue College is committed to:

1. Monitoring by racial group, admission and progress of learners and the recruitment and career progression of staff.
2. Assessing the impact of its policies, including its Race Equality Policy, on learners and staff of different racial groups, identifying and addressing any inequalities and disadvantage.

Implementation of the Policy

1. A complaint may be made in writing to Cool Blue College whereby it will be allocated a unique reference number, and within 5 working days of receipt, acknowledgement will be sent indicating the person within Cool Blue College who will be dealing with the complaint.
2. Your complaint will then be investigated, and a reply sent within 21 working days detailing the findings.
3. Should you feel unhappy with the response provided by Cool Blue College you can appeal in writing to the Managing Director who will acknowledge receipt of your request within 5 working days.
4. A re-investigation will then commence, and all decisions will be reviewed. The findings will then be communicated in writing up to 28 days from acknowledgement of receipt of the appeal.
5. Referral to higher orders, such as Awarding Bodies and the Learning & Skills Council, will only commence should the findings of the Director's investigation be deemed unsatisfactory. Cool Blue College will then abide by the procedures identified by the appropriate higher order.

Monitoring & Review

All received complaints will be reviewed on a quarterly basis by the Managing Director and the Quality & Compliance Coordinator. As part of the Senior Quality Review Meetings the number of complaints logged and any observable trends will be discussed in detail and an appropriate plan of action to rectify the situation will be created.

Appendix

Note 1

The report 'Ethnicity and Employment in Higher Education' (Modood, Fenton and Carter, 1999, of the Policy Studies Institute) has been the most comprehensive survey to date examining the position of black and minority staff in academic and related employment. Some of the major findings were as follows:

1. There has been less progress on ensuring racial equality in higher education in the last few years than in sex equality.
2. Black and ethnic minority learners make up an increasing proportion of learners and yet this is not reflected in the make up of teaching staff, or those in senior administrative posts. Staff classifying themselves as Bangladeshi, Pakistani, Black Caribbean and Black 'Other' are significantly underrepresented in academic posts.
3. Nationally, minority ethnic groups are over-represented in fixed term research posts. One in four black and minority ethnic academics said they had experienced discrimination in job applications and promotions, and also experienced isolation and lack of support. One in five said they had experienced racial harassment or abuse from staff or learners. Minority ethnic academics with nine or more years of service are only about half as likely to be professors as their white peers. The position of minority ethnic women, especially non-British women, is the most disadvantaged.
4. There have been a number of well-publicised successful Employment Tribunal cases involving academic staff alleging racial discrimination against Higher Education Institutions, in the last few years.

Note 2

Some common manifestations of institutional racism, which are important to note are:

1. 'It doesn't happen here' - a denial of the possibility of discriminatory practice within an institution in the absence of accurate data, or without consulting those most likely to be on the receiving end of discrimination, or a refusal to accept such findings.
2. A 'colour blind approach', which treats everyone the same and which does not acknowledge or address the differing needs of black and minority staff and therefore potentially marginalises their perspective.
3. Abdication of one's personal responsibility for tackling racism, by not challenging others' behaviour or attitudes, as 'it does not directly affect me', or for fear of unpopularity or reprisals.
4. Failing to incorporate race issues within day-to-day practice, procedures, and mainstream activity.
5. Lack of awareness and understanding about how structures and individuals unwittingly perpetuate racism, without attempting to attend training, or to be self-aware about one's own assumptions, behaviour, and attitudes, or to acquire new knowledge and act on it.

6. Under-representation of specific groups within the organisation, particularly at a senior and influential level, the absence of a 'minority' perspective on key decision-making bodies and fora.
7. A belief that there are no barriers within the institution and/or insufficient recognition of discrimination at an earlier educational level, i.e., a lack of awareness that the playing field is not level. The assumption that setting targets for black and ethnic minority staff will entail lowering standards or no longer appointing on merit.
8. A weak commitment in practice, to implementing the policies that institutions subscribe to on paper.

Review of Policy Statement

This procedure will be reviewed at minimum, on an annual basis or when necessary, by the Managing Director of Cool Blue College and the Quality & Compliance Coordinator

Date of Review	Print Name	Position
9 th January 2023	Mark Clelland	Director
	Luke Stavers	Quality & Compliance



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