**Equal Rights and Diversity Action Statement**

**October 2025**

Equal Rights and Diversity Action Statement

**1. Commitment to fairness and equality**

Skills for Work is committed to the principles of creating a fair and inclusive society and promoting equal rights and the benefits of diversity. It is working towards eliminating all forms of unlawful discrimination, abuse, inequality, exclusion, victimisation, harassment and bullying of its employees, customers, and other people who have contact with the organisation, including employer/placement providers and subcontractors.

We will strive to be fair in our decisions and in the way we act. We will take people’s differing needs into account by serving and representing the whole district in all its diversity. This includes those who experience discrimination or exclusion and whose needs are greatest.

Our policies, activity and decisions will always seek to promote equality and tackle discrimination. Skills for Work seeks to address inequalities in employment and skills in the district by promoting heath and economic wellbeing, reducing worklessness and raising skills.

We will ensure, wherever we can, that those groups affected by poverty or protected in the Equalities Act 2010 are not disproportionately affected as a result of our decisions.

This Equal Rights and Diversity Action Statement complements the [City of Bradford Metropolitan District Council’s Equal Rights and Diversity Statement (2021),](https://www.bradford.gov.uk/your-council/equality-and-diversity/bradford-councils-equality-and-diversity-statement/) and [Equality Objectives and Equality Action Plan (2021–25)](https://www.bradford.gov.uk/your-council/equality-and-diversity/bradford-council-s-equality-objectives/) and other Council strategies (which can be accessed from the Council’s website).

Skills for Work is committed to safeguarding and promoting the welfare of young people and adults on its employment and skills programmes. This commitment and details of how Skills for Work’s safeguards young people and adults at risk are set out separately in Skills for Work’s Safeguarding Young People and Adults procedures and Customer Health, Safety and Welfare Policy.

**2. The Law**

The Equality Act 2010 protects people from unlawful discrimination on the basis that they share certain ‘protected characteristics’. As part of that Act, the public sector

Equality Duty was extended from race, gender and disability in April 2011 to cover all protected characteristics defined in the Act.

The protected characteristics are: - age; disability; pregnancy and maternity; race and nationality; religion and belief (this includes lack of belief); sexual orientation; gender reassignment and sex.

The public sector equality duty under the Equalities Act 2010 requires public bodies such as Skills for Work when exercising its functions to have **‘due regard’** to the need to:

* eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010
* advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
* foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

Under the Public Sector Equality Duty Skills for Work is required to publish equality information to demonstrate compliance with the equality duties and to set equality objectives. Skills for Work will, along with other Council Departments and Services, publish equality information on the Council’s website.

Skills for Work is also committed to complying with the Prevent Duty in the Counter-Terrorism and Security Act 2015. This involves protecting individuals of any faith, ethnicity or background who may be at risk of being exploited by radicalisers and subsequently drawn into terrorist-related activity.

**3. Introduction**

This Action Statement illustrates how Skills for Work will implement its commitment to equality and diversity and who is responsible. Every employee, customer, employer/placement provider or subcontractor has a responsibility to act in a manner that upholds and follows the spirit and intentions of this Action Statement.

Skills for Work’s Principal and Employment and Skills Strategic Manager, have overall responsibility for the implementation of this Action Statement, however it is recognised that it is the collective responsibility of all persons connected with the organisation to contribute to the implementation of this Action Statement.

**4. Recruitment and Selection**

Skills for Work will ensure that its recruitment and selection procedures are fair, non-discriminatory and recognise diversity.

√ All promotional material will avoid stereotypical images and be designed to encourage suitable applicants based solely on functional requirements.

√ Equal rights monitoring information will be obtained from application forms. The information will not be used as part of the selection process. This information  will be analysed on a regular basis in order to identify any trends or under represented groups and appropriate action will be taken.

* Applicants for jobs within the Council will be considered solely on the basis of their competencies, qualifications if required and experience.
* Selection of customers will be on the basis of the most suitable person for the opportunity subject to specific programme eligibility criteria.

**5. Procedures for making a complaint**

An employee or customer who feels that they have been the victim of unlawful discrimination or suffered victimisation, abuse, bullying or harassment (including cyberbullying and harassment via text messages or the internet or other social media) have the right to have their complaints investigated through the Council’s employee or Skills for Work’s customer complaints procedure. The Council is committed to reducing incidents of racial, homophobic, trans-phobic, gender, disability-related and religiously motivated bullying and harassment, including cyber-bullying and hate crime, in workplaces and in our communities. Any resulting actions will be taken in line with the organisation’s disciplinary procedures.[[1]](#footnote-1)

√ Customers who are subject to or witness any act of discrimination, abuse, harassment,victimisation or bullying (including cyberbullying and hate crime) should report it immediately to a member of staff or a Manager who will take action under the appropriate customer complaints procedure.

√ Complaints will be investigated within the timescale laid down in the relevant procedure and details/action will be recorded and relayed to the complainant.

**6. Dignity and respect in the Work Place**

Skills for Work recognises that it is essential for all employees and customers to conduct themselves in such a way as to contribute to a safe and welcoming environment, which creates a sense of well-being, confidence, security, and identity for all, and where all employees and customers feel safe. We take a zero-tolerance approach to any discrimination, victimisation, bullying and harassment.

**7. Special conditions**

# Persons with Disabilities

Skills for Work recognises the rights of disabled people, including people with mental health conditions, and makes every effort to ensure that they are not discriminated against or treated less favourably because of a reason relating to their disability, without a justifiable reason.

The Council particularly encourages applications from disabled people who are under-represented amongst our employees. It is the Council's policy to guarantee interviews for candidates with a disability who meet the shortlisting requirement for disabled applicants by providing evidence of meeting all of the key competencies only detailed in the job profile, i.e. not any additional ones, considering any reasonable adjustments that may need to be made.

To support our aim of removing barriers to employment for disabled people we are committed to making any necessary reasonable adjustments. These adjustments may include modifying the selection processes, or the working environment.

Skills for Work has made reasonable adjustments to the physical features of its premises, to overcome physical barriers to access and improve access to Skills for Work’s premises and services for both employees and customers. Additional support, including special aids or equipment will be sought through Access to Work, if required to enable customers to access sustainable employment opportunities.

All staff and customers will be treated fairly irrespective of a perceived disability or on the grounds of associative discrimination (see Appendix 2).

# Ex-Offenders

No discrimination shall be made in respect of ex-offenders in line with the Rehabilitation of Offenders Act 1974, the Offender Rehabilitation Act 2014, and the Council’s Policy Statement on the Employment of People with a Criminal Record. However certain positions, particularly job/learning opportunities are exempt from the Rehabilitation of Offenders Act, and in addition some are subject to provisions concerning the protection of children or adults at risk.

# Sexual harassment/discrimination/abuse

Skills for Work will not tolerate any form of sexual discrimination, bullying, harassment, or abuse. Skills for Work recognise the diverse nature of its employees/customers and endeavours in all its action to deal with individuals in the spirit of its initial commitment statement. All staff and customers will be treated fairly irrespective of their perceived gender or on the grounds of associative discrimination.

# Racial harassment/discrimination/abuse

Skills for Work will not tolerate any form of racial discrimination, bullying, harassment, or abuse. Skills for Work recognise the diverse nature of its employees/customers and endeavours in all its action to deal with individuals in the spirit of its initial commitment statement. All staff and customers will be treated fairly irrespective of their perceived race (including ethnic origin, colour, nationality, and national group) or on the grounds of associative discrimination.

Religion or belief

Skills for Work will not tolerate any form of discrimination, bullying, harassment or abuse on the grounds of religion or belief (including lack of belief). Skills for Work recognise the diverse nature of its employees/customers and endeavours in all its action to deal with individuals in the spirit of its initial commitment statement. All staff and customers will be treated fairly irrespective of their perceived religion or belief or on the grounds of associative discrimination.

Sexual orientation

Skills for Work will not tolerate any form of discrimination, bullying, harassment, or abuse on the grounds of anyone’s actual or perceived sexual orientation. Skills for Work recognise the diverse nature of its employees/customers and endeavours in all its action to deal with individuals in the spirit of its initial commitment statement. All staff and customers will be treated fairly irrespective of their perceived sexual orientation or on the grounds of associative discrimination.

Age

Skills for Work will not tolerate any form of discrimination, bullying, harassment, or abuse on the grounds of anyone’s age. Skills for Work recognise the diverse nature of its employees/customers and endeavours in all its action to deal with individuals in the spirit of its initial commitment statement. All staff and customers will be treated fairly irrespective of their perceived age or on the grounds of associative discrimination.

# Pregnancy and maternity

Skills for Work recognise its legal responsibilities to ensure that its practices and procedures do not prevent employees/customers who are pregnant and/or are new parents from participating in work or learning. All staff and customers will be treated fairly irrespective of their perceived protected characteristic or on the grounds of associative discrimination.

Gender reassignment

Skills for Work will not tolerate any form of discrimination, bullying, harassment or abuse on the grounds of gender reassignment. Skills for Work recognise the diverse nature of its employees/customers and endeavours in all its action to deal with individuals in the spirit of its initial commitment statement. All gender variant, gender and transsexual staff and customers will be treated fairly irrespective of their perceived gender reassignment or on the grounds of associative discrimination.

**8. Learning and development**

The learning and development of employees/customers and employers is recognised as an integral part of promoting equality and diversity ensuring that individuals have a clear understanding of relevant issues.

* All employees/customers will receive equal rights and diversity awareness training as part of their induction programme and throughout their employment/skills/apprenticeship programme.
* All employees involved in the recruitment process will receive the appropriate equal rights and diversity training.
* All staff will receive equal access to learning and development opportunities.
* Skills for Work will work with its subcontractors and employers to ensure that customers are given equal access to learning and development.
* Skills for Work will endeavour to ensure that learning materials are free from bias and that teaching styles vary to meet individual needs.
* The curricula will be sensitive to the diverse backgrounds of customers and celebrate cultural diversity.

**9. Subcontractors/Apprenticeship Employers**

All parties in the learning process are expected to have the same commitment to the principles of creating a fair and inclusive society and promoting equal rights and the benefits of diversity that prevails within Skills for Work.

There is a clear expectation that subcontractor’s/apprenticeship employers or other organisations working with Skills for Work will incorporate equal rights in their work practices and behave in a manner consistent with the Council’s declared policy and procedures.

Skills for Work will carry out pre-vetting of all subcontractors/employers, to ensure compliance with the equality ethos of Skills for Work prior to accepting them as a suitable placement provider.

**10. Review, Monitoring & Evaluation**

Skills for Work will systematically monitor and evaluate the effectiveness and impact of its Equal Rights and Diversity Action Statement.

Skills for Work will consider the following areas: -

* The composition of the workforce and customer cohort in relation to their key protected characteristics. Identify under representation for any specific groups and where appropriate identify actions to address such findings.
* Equality impact assessments of Skills for Work’s functions, policies and to identify potential adverse impacts on particular groups of customers/employees.
* Positive action will be considered if appropriate.
* Analysis of customer participation, retention, and achievement in relation to key protected characteristics.
* Review and monitor the incidence and nature of complaints by protected characteristic reported under the complaints and disciplinary procedures in relation to equality and diversity and report the findings back to management.
* Issues relating to equality and diversity highlighted in the customer/employee review/appraisal processes will be passed to the appropriate Manager immediately in order that a thorough investigation can be carried out.
* Issues around equality raised during internal and external inspections will be passed to the appropriate Manager immediately in order that a thorough investigation can be carried out.
* Reports and action plan concerning equality and diversity arising from the monitoring and review of employees and customers will be reviewed by the appropriate Manager for evaluation towards continuous quality improvement.

**11. Responsibility**

The ultimate responsibility lies with the management structure of Skills for Work, but it is the responsibility of every employee, customer and employer/placement provider and subcontractor to implement this Action Statement in their day-to-day work.

Date: September 2025 Reviewer SMcGladdery

Review Date: October 2026

## Appendix 1 – Summary of Current Legislation

√ Equality Act 2010

√ Rehabilitation of Offenders Act 1974

* Gender Reassignment Regulations 1999

√ Protection from Harassment Act 1997

√ Human Rights Act 1998

* Protection of Freedoms Act 2012

√ Civil Partnership Act 2004

√ Gender Recognition Act 2004

√ Asylum and Immigration Act 1996 (Revised 1 May 2004)

√ Employment Rights Act 2002

√ The National Minimum Wage Act 1998

* Working Time Regulations 1998
* Working Time (Amendment) Regulations 2002

√ Trade Union and Labour Regulations Act 1992

* Employment Relations Act 1999
* Employment Act 2002 (Flexible working regulations)
* The Special Educational Needs and Disability Act 2001
* The Children Act 2004
* The Crime and Disorder Act 1998
* Work and Families Act 2006
* Racial and Religious Hatred Act 2006
* Safeguarding Vulnerable Groups Act 2006
* Immigration, Asylum and Nationality Act 2006
* Freedom of Information Act 2000
* Marriage (Same Sex Couples) Act 2013
* Children and Families Act 2014
* Offender Rehabilitation Act 2014
* The Anti-social Behaviour, Crime and Policing Act 2014
* Prevent Duty in the Counter-Terrorism and Security Act 2015

**Appendix 2 – Useful Definitions**

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| **Bullying** (including online orcyberbullying) | Bullying is a form of harassment and can be defined as the use of position or power to coerce others by fear, oppression or threats. It is made up of a number of things such as aggressive behaviour, intimidation, persistent criticism, constant undermining and the spreading of malicious rumours. It can be difficult to detect, as it can be subtle and devious. Cyberbullying is defined as “the use of Information Communications Technology (ICT), particularly mobile phones and the internet, deliberately to upset someone else” (DfE definition). |
| **Disability** | The Equality Act 2010 defines a ‘disabled person’ for the purpose of the Act as a person who has a ‘disability’ if he or she has a physical or mental impairment which has a substantial and long-term adverse effect on her or his ability to carry out normal day-to-day activities. However, there are special rules that apply to people with certain impairments like progressive conditions. Also, some people are deemed to be disabled people, for example those with HIV, cancer, and some visual impairments. In addition, a mental illness does not have to be 'clinically well recognised' before it is judged to be a mental impairment for the purposes of the Act. |
| **Discrimination (Direct)** | Occurs when someone is treated less favourably than another person because of a protected characteristic they have or are thought to have, or they associate with someone who has a protected characteristic. |
| **Discrimination (Indirect)** | The use of an apparently neutral practice, provision or criterion which puts people with a particular protected characteristic at a disadvantage compared with others who do not share that characteristic, and applying the practice, provision or criterion cannot be objectively justified. |
| **Associative Discrimination** | Already applying to race, religion or belief and sexual orientation the Equality Act 2010 now extend this to cover age, disability, gender reassignment, sex, pregnancy and maternity. This is direct discrimination against someone because they associate with another person who possesses the characteristic. |
| **Diversity** | The concept of diversity encompasses acceptance and respect. It understands that each individual is unique and recognising individual differences. It is the exploration of these differences in a safe, positive and nurturing environment. It is about understanding each other and moving beyond simple tolerance to embracing and celebrating the rich dimensions of diversity contained within each individual. |
| **EHRC** | Equality and Human Rights Commission |
| **Hate Crime** | Hate crimes are crimes that are directed at a person due to their protected characteristics e.g. race, sexual orientation, transgender identity, religion or belief, or disability. Hate Crimes happen because of hostility, prejudice or hatred. They include things like name calling and verbal abuse, bullying and harassment, spitting and physical attacks, and damage to property, graffiti, and written notes, emails, and text messages. |
| Harassment | Harassment is unwanted conduct related to a relevant characteristic, which has the purpose or effect of violating an individual’s dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual. Harassment applies to all protected characteristics except for pregnancy and maternity and marriage and civil partnership. Employees are also protected from harassment because of perception and association. |
| Prevent Duty | *Prevent* is one part of the government’s CONTEST strategy to target the threat of terrorism and violent extremism. The programme is focused on non-criminal activity and is intended to safeguard vulnerable people from being exploited by violent and extreme ideologies. |
| **Protected Characteristics** | These are the grounds upon which discrimination is unlawful. The characteristics are:- age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. |
| **Race** | Refers to the protected characteristic of race. It refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins. |
| **Reasonable adjustment** | Where a disabled person is at a substantial disadvantage in comparison with people who are not disabled, there is a duty to take reasonable steps to remove that disadvantage by (i) changing provisions, criteria, or practices, (ii) altering, removing or providing a reasonable alternative means of avoiding physical features and (iii) providing auxiliary aids. For service providers, the duty to make reasonable adjustments is anticipatory; within reason, it is owed to all potential disabled customers and not just to those who are known to the service provider. |
| **Under-represented groups** | These are made up of persons from identifiable groups in the community, such as those from minority ethnic communities, people with disabilities and, in some instances, men or women, who make up a significantly low proportion of customers in a particular area of learning or programme. The degree of under-representation is determined by comparing the proportion of customers from such groups on a programme, with the proportion of these groups in the local population. |
| **Victimisation** | Occurs when a person (the person victimised) is treated less favourably than others are because they have made or intend to make a complaint regarding the way they have been treated. |

1. See the appropriate disciplinary procedure. ‘Bullying’ includes cyber-bullying and prejudice-based bullying related to special educational need, sexual orientation, sex, race, religion and belief, gender reassignment or disability. [↑](#footnote-ref-1)