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## Equality, Diversity and Inclusion Policy

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## 1. Purpose and Scope

This policy sets out Heritage Skills Academy's commitment to equality, diversity and inclusion across all aspects of our apprenticeship provision. It applies to our learners, staff, employers, subcontractors, and anyone who engages with our services.

HSA is a specialist apprenticeship provider delivering the Level 3 Heritage Engineering Technician Apprenticeship Standard from our centres at Bicester Motion and Brooklands Museum. We recognise that the heritage engineering sector has historically lacked broad diversity, and we see this as both a challenge and an opportunity. This policy is designed to help us actively widen participation, remove barriers, and build genuinely inclusive learning experiences — not as an exercise in compliance, but because it is the right thing to do and will strengthen our sector.

We are a small provider and we are building these systems rather than inheriting established infrastructure. This policy reflects both our current practices and the improvements we are actively implementing through our Quality Improvement Plan. It will be reviewed annually and updated as our practices mature.

## 2. Legislative Framework

This policy is informed by the following legislation and guidance:

- **Equality Act 2010** — which provides the legal framework for protecting individuals from discrimination on the basis of nine protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.
- **Public Sector Equality Duty (PSED) principles** — although HSA is an independent training provider and not directly subject to the PSED, we choose to apply its principles voluntarily. The PSED requires public bodies to have due regard to three aims: eliminating discrimination, advancing equality of opportunity, and fostering good relations between people who share a protected characteristic and those who do not. Ofsted expects all providers to demonstrate they are working to these principles as part of effective practice in education provision, and HSA adopts them as a framework for good practice.
- **SEND Code of Practice 2015** — which sets out duties on education providers in relation to learners with special educational needs and disabilities. We apply its principles in identifying, assessing and supporting learners with additional needs.
- **Apprenticeship funding rules and ESFA guidance** — including requirements relating to learning support funding, additional learning needs, and reporting obligations.
- **Ofsted Education Inspection Framework** — which requires providers to demonstrate how they promote equality and diversity and how this is embedded in teaching, learning, and assessment.

### 3. Our Commitment

Heritage Skills Academy is committed to:

- Treating all learners, staff, and stakeholders with dignity and respect, regardless of protected characteristic
- Actively working to widen participation in heritage engineering, a sector where diversity has historically been limited
- Identifying and removing barriers to recruitment, retention, achievement, and progression
- Providing reasonable adjustments and targeted support so that all learners can succeed
- Embedding EDI into governance, quality assurance, and everyday practice — not treating it as a separate or peripheral concern
- Being transparent about our current stage of development and the progress we are making over time
- Challenging stereotypes and unconscious bias, including assumptions about who belongs in heritage engineering
- Ensuring that our industry engagement programme and the opportunities it provides are accessible to all learners equitably
- Complying with equality legislation and ensuring that discrimination, harassment and victimisation are actively prevented and addressed

### 4. Roles and Responsibilities

As a small team, every member of staff has a role in making EDI real. The specific responsibilities are set out below.

Role	Responsibilities
Governance Board	Oversight of EDI performance; review of EDIMs at quarterly Board meetings; approval of policy and action plans; challenging management on progress
General Manager	Strategic lead for EDI; accountable for embedding EDI into quality assurance and business planning; reporting to the Board
Apprentice Success Manager	Designated SEND and additional support lead; initial needs assessment; recording support needs on learner profiles; coordinating access arrangements; communicating adjustments to tutors
Tutors and Assessors	Implementing reasonable adjustments in teaching and assessment; identifying emerging support needs; providing feedback on effectiveness of adjustments; promoting inclusive practice in sessions
All Staff	Upholding EDI principles; reporting concerns; participating in EDI training; contributing to an inclusive learning environment. Reporting

	concerns promptly through safeguarding, complaints, or management routes where appropriate
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### 5. Equality, Diversity and Inclusion Metrics (EDIMs)

EDIMs are the quantitative measures we use to monitor whether our provision is equitable across different groups of learners. They allow us to identify gaps, track trends, and take targeted action.

HSA began collecting EDIMs data from the point of application in 2025. We recognise that our dataset is still developing, particularly in relation to progression and destinations, and that it will take time before we have sufficient data to identify meaningful trends. This does not prevent us from establishing the framework now and using the data we have to inform our practice.

Our EDIMs framework disaggregates data not only by protected characteristic but also by other factors that may affect learner outcomes. These include:

- **Protected characteristics** — particularly age, sex, ethnicity, and disability, where voluntarily declared and recorded in ILR data
- **Learning difficulties and disabilities (LDD)** — including declared conditions such as dyslexia, ADHD, and autism spectrum conditions
- **English and maths starting points** — as identified through Pass Functional Skills initial and diagnostic assessments
- **Employer** — since learners come through different workshops and garages, employer context may influence outcomes
- **Delivery site** — Bicester Motion and Brooklands Museum, to identify any site-specific patterns

The table below sets out what we monitor at each stage of the learner journey and how.

Stage	What We Monitor	How
Recruitment	Applications, offers, and enrolments disaggregated by protected characteristic, LDD status, prior attainment, and employer; sources of recruitment; patterns of under-representation	Application and enrolment data collected since 2025; demographic analysis at each recruitment cycle
Retention	In-learning retention rates disaggregated by protected characteristic, LDD status, English and maths starting point, employer, and delivery site; reasons for withdrawal or break in learning	Quarterly data review; exit interviews and/or surveys to be introduced

Achievement	Achievement rates disaggregated by protected characteristic, LDD status, prior attainment, employer, and delivery site; timely achievement; functional skills pass rates by starting level	End-point assessment outcomes; ILR data analysis; comparison with national rates where available
Progression	Destinations data disaggregated by protected characteristic and LDD status; access to industry engagement opportunities across all learner groups	Destination surveys; employer feedback. Data collection began in 2025 and a meaningful dataset is still being established

### 5.1 Data Collection and Analysis

Demographic data is collected at application and enrolment, in line with ILR requirements. This includes data on age, sex, ethnicity, disability, and learning difficulty. Where learners choose not to declare, this is respected and recorded as “not declared.” English and maths starting points are established through Pass Functional Skills initial and diagnostic assessments, which were introduced for the May 2025 cohort and will continue for all new cohorts going forward.

Data will be analysed quarterly by the General Manager and presented to the Governance Board. Analysis will compare HSA’s learner profile and outcomes against national benchmarks and sector averages where available, and will seek to identify any gaps between groups of learners. As our dataset grows, we expect this analysis to become more meaningful and to support more targeted intervention.

### 5.2 Embedding EDIMs into Governance

EDIMs will form a standing agenda item at quarterly Governance Board meetings. The Board will receive a summary report covering:

- Current learner demographic profile and any changes since the last report
- Retention, achievement, and progression data disaggregated by the categories set out above
- Any identified gaps or areas of concern, including gaps between learner groups that are not defined by protected characteristic alone
- Actions taken or planned to address gaps
- Progress against Quality Improvement Plan EDI actions

Board members will be required to scrutinise this data and evidence challenge where gaps or disparities are identified. EDIMs will also be referenced in the annual Self-Assessment Report.

### 5.3 Embedding EDIMs into Quality Assurance

As our EDIMs data develops, it will be progressively integrated into our quality assurance processes. Our intention is that EDI data and analysis will inform:

- Programme-level performance monitoring, enabling us to identify where particular groups of learners may be underperforming
- The Quality Improvement Plan, where EDI-related actions are recorded with clear owners and timescales
- The annual Self-Assessment Report, providing an evidence base for judgements about the inclusivity of our provision

We recognise that this integration is at an early stage. As we build a more complete dataset, we will be better placed to use EDIMs data to drive specific improvements in teaching, learning, and assessment.

## 6. Identifying and Supporting Learners with SEND and Additional Needs

HSA is committed to identifying and supporting learners with special educational needs and disabilities (SEND) and any additional learning needs. We recognise that early identification and well-communicated adjustments are essential to enabling all learners to succeed.

To date, identification and support have been managed on a largely informal basis, with tutors making adaptations as needs arise. We are now formalising these arrangements to ensure that needs are recorded consistently, that adjustments are planned and documented, and that information is communicated reliably to all staff involved in a learner's programme. Support information will only be shared with staff who require it to fulfil their role.

### 6.1 Identification of Needs

Learners' support needs are identified through multiple routes:

- Self-declaration at application and enrolment (including any pre-existing Education, Health and Care Plans or access arrangements from prior education)
- Pass Functional Skills initial assessment in English and maths, introduced for the May 2025 cohort and continuing for all new cohorts, which identifies current working levels and specific skill gaps
- Pass Functional Skills diagnostic assessments, which provide more detailed analysis of English and maths needs and inform the level of study and support required
- Tutor observation during early weeks of the programme, where emerging needs such as undiagnosed dyslexia or other processing difficulties may become apparent
- Learner self-referral at any point during their programme
- Information from employers, parents, or carers where appropriate and with the learner's consent

### 6.2 The Role of the Apprentice Success Manager

The Apprentice Success Manager is HSA's designated lead for additional learning support. This role includes:

- Conducting or coordinating initial needs assessments
- Recording all identified needs, agreed adjustments, and support plans on the learner's individual profile
- Liaising with external agencies or specialists where further assessment is needed (for example, formal dyslexia screening)
- Ensuring that support information is communicated clearly to all relevant tutors and assessors before or at the start of teaching
- Reviewing support plans at agreed intervals and updating them as needs change
- Maintaining confidentiality and ensuring data is stored in accordance with GDPR requirements

### 6.3 Recording Support Needs

All identified support needs and adjustments will be recorded formally. The following information will be captured on each learner’s profile:

Information Recorded	Detail
Declared learning difficulties or disabilities	Including dyslexia, dyscalculia, ADHD, autism spectrum conditions, physical disabilities, mental health conditions, and any other declared need
Pass Functional Skills initial and diagnostic assessment outcomes	English and maths levels; specific skill gaps identified; recommended level of study
Access arrangements	Extra time, use of assistive technology, alternative assessment formats, reader or scribe support, rest breaks
Agreed reasonable adjustments	Adjustments to teaching delivery, materials, workshop access, assessment methods, or timetabling
Support plan and review dates	Actions agreed, responsible person, review frequency, and outcomes of reviews

This information will be held centrally and updated as needs are reviewed. It will form part of the evidence base for any learning support funding claims. All records are maintained securely and accessed in line with GDPR principles of data minimisation and confidentiality.

### 6.4 Communicating Support Information to Tutors

It is not sufficient to record support needs if that information does not reach the people delivering teaching and assessment. Currently, communication of additional needs to tutors happens informally. We are formalising this so that:

- Tutors and assessors will receive a summary of each learner’s support needs and agreed adjustments before or at the start of teaching
- Where a new need is identified mid-programme, relevant tutors will be informed promptly by the Apprentice Success Manager
- Support summaries will be reviewed and re-circulated at the start of each new term or teaching block
- Tutors will be encouraged to provide feedback on whether adjustments are working effectively and to flag any emerging concerns
- Sensitive information will be shared on a need-to-know basis, with the learner’s knowledge and where appropriate, in accordance with their consent and safeguarding requirements

### 6.5 Reasonable Adjustments

HSA will make reasonable adjustments to ensure that learners with disabilities or additional needs are not placed at a substantial disadvantage. Adjustments may include but are not limited to:

- Additional time for assessments
- Use of assistive technology or specialist software
- Modified learning materials (for example, larger font, coloured overlays, or alternative formats)
- Adjusted timetabling or break arrangements
- Alternative assessment methods where permitted by the awarding organisation
- Adaptation of workshop or practical activities to ensure safe and equitable access

Adjustments are agreed in discussion with the learner and recorded on their support plan. Where adjustments require approval from the end-point assessment organisation, the Apprentice Success Manager will coordinate the application process in good time.

## **7. Promoting EDI in Teaching, Learning and Assessment**

EDI is not only a policy matter — it must be visible in the way we teach and assess. HSA expects all tutors and assessors to:

- Use inclusive language and challenge stereotypes or discriminatory attitudes wherever they arise
- Draw on diverse examples, case studies, and perspectives in teaching, including the contributions of people from different backgrounds to engineering and heritage conservation
- Differentiate teaching to meet individual learning needs, using the support information provided
- Create a learning environment where all learners feel safe to participate, ask questions, and make mistakes
- Reflect on their own unconscious biases and participate in relevant training and development

Observation of teaching, learning and assessment will include consideration of how effectively EDI is promoted and embedded in practice.

## **8. Staff Training and Development**

EDI training will be included in the induction process for all new staff and incorporated into our ongoing continuing professional development (CPD) programme. Training will cover:

- Awareness of the Equality Act 2010 and protected characteristics
- Understanding unconscious bias and its impact on decision-making
- Practical approaches to inclusive teaching and assessment
- Identifying and responding to additional learning needs
- Recognising and challenging discrimination, harassment, and victimisation

Training records will be maintained and reviewed as part of staff performance management. We are currently developing our EDI training programme and will implement it as part of the actions set out in our Quality Improvement Plan.

### **9. Reporting and Addressing Concerns**

Any learner, member of staff, employer, or other stakeholder who believes they have experienced or witnessed discrimination, harassment, or victimisation should report this to the General Manager or any member of staff they feel comfortable speaking to.

All concerns will be taken seriously, investigated promptly, and handled in accordance with our Complaints and Grievance procedures. HSA will not tolerate retaliation against anyone who raises a concern in good faith.

Where a concern involves a safeguarding issue, it will be escalated in accordance with our Safeguarding Policy.

### **10. Implementation**

This policy reflects both our established practices and the systems we are currently building. HSA acknowledges that a number of the processes described in this document are being implemented for the first time or are being formalised from previously informal arrangements.

The specific actions, owners, and timescales for full implementation are set out in our Quality Improvement Plan. Key areas of development include:

- Quarterly EDIMs analysis and reporting to the Governance Board
- Introduction of exit interviews and/or surveys for learners who withdraw
- Building a meaningful progression and destinations dataset
- Formalising the recording of support plans and additional needs
- Establishing a consistent process for communicating support information to tutors
- Developing and delivering an EDI training programme for all staff as part of induction and CPD
- Progressive integration of EDIMs data into quality assurance processes

We will track progress against these actions through the QIP and report on them through our governance arrangements.

### **11. Monitoring and Review**

This policy will be reviewed annually by the General Manager and approved by the Governance Board. The review will consider:

- Whether the policy remains current and aligned with legislation and good practice
- Progress against Quality Improvement Plan actions relating to EDI

- Feedback from learners, staff, and employers
- Any incidents, complaints, or trends that indicate areas for improvement
- Developments in sector-wide best practice for EDI in apprenticeships

## 12. Related Policies

This policy should be read in conjunction with:

- Safeguarding and Prevent Policy
- Complaints Policy
- Grievance Procedure
- Data Protection Policy
- Health and Safety Policy
- Prevent Policy
- Quality Improvement Plan
- Apprentice and Staff Privacy Notices