



Ixion

Ixion Group Policy & Procedure

Equality & Diversity





Policy Statement

The Ixion Group (Ixion) is committed to providing equality of opportunity and freedom from unlawful discrimination on the grounds of age, sex, sexual orientation, disability, race (including colour, nationality, ethnic origin), religion or beliefs, gender reassignment, pregnancy and maternity status, marital or civil partnership status.

We will:

- actively oppose all forms of discrimination and unfair or discriminatory practices;
- value and harness the diversity of our employees, customers, suppliers, partner organisations and local communities;
- create an environment within which all individuals are treated with fairness and respect, promoting our Dignity & Respect values;
- tackle prejudice and promote understanding between different groups of people to create a harmonious and respectful workplace and society;
- take positive action to encourage participation of under-represented groups in our workplace and our programmes;
- embed the concept of British Values within our equality and diversity practices;
- fully implement the Equality Act 2010 and associated legislation to eliminate discrimination, harassment and victimisation.

Many people suffer discrimination and disadvantage based on their social or economic position e.g. through education, employment status and history, undiagnosed mental health issues, caring responsibility, their housing situation, or a criminal record. Ixion regularly comes into contact with customers who face one or more of these challenges and who need support to achieve equality of opportunity, to challenge barriers to participation, achievement and social inclusion.

Through our policy, we aim to support our staff, supply chain partners, customers and others we work with to access opportunities that enable them to achieve the best of their ability and create strong, stable and sustainable communities.

This policy applies in our employment and personnel practices, and across all areas of our business – in our own service delivery, in our role as a supply chain manager, and as an active member of the communities in which we live and work.

While the overall responsibility for achieving, promoting and providing equality of opportunity rests with Ixion, all of our employees, supply chain partners, customers and other stakeholder are expected to conduct themselves in a way that supports and promotes this policy, including freelance and temporary workers, work experience students, consultants and contractors.

Ixion's Board will establish Equality & Diversity Objectives on an annual basis to help embed equality and diversity practice across all aspects of our business, and to continually improve our performance in this area.



Communication

All employees, irrespective of their job or seniority, will be given guidance and instruction, through induction and mandatory training each year, as to their responsibility and role in promoting equality of opportunity, avoiding discrimination and valuing diversity. The policy will be available on the Ixion Cloud shared drive for reference at any time.

Customers will be advised about this policy as part of their induction to the service they receive from Ixion. The policy will also be available on our website and on display in our offices for visitors to view.

We require all subcontractors to reflect the Ixion policy within their own working practices. We will not contract with organisations who do not meet the same standards. Policies and working practices will be reviewed as part of our due diligence activity prior to entering into a commercial relationship.

Any breach of this policy could lead to action under Ixion's Discipline & Dismissal procedures for employees and Supply Chain Management Framework for Ixion's subcontractors.

Associated Policies

This Policy and associated procedures should be read in conjunction with the following Policies:

- Anti-Harassment & Bullying
- Code of Conduct
- Data Protection
- Discipline & Dismissal
- Feedback & Complaints
- Grievance
- Learning & Development
- Family
- Performance Management and Capability
- Recruitment & Selection
- Safeguarding
- Preventing Extremism & Radicalisation
- Whistleblowing

Ixion as an Employer

Equality in the workplace means:

- Having trained staff who understand equality issues (and proactively promote them);
- Having staff who support the company mission and values (and proactively promote them);
- Having staff who reflect the population (and proactively promote it);
- Having staff that will provide services fairly and effectively (and proactively promote them).

Ixion has clear procedures covering recruitment, development, and management of staff, which underpin our approach to equality in this area of our business. We will:

- operate a fair and open recruitment policy.
- publicise our Equality & Diversity Policy through job specifications and adverts.
- avoid including discriminatory or restrictive requirements within person specifications.



- make decisions concerning recruitment, selection, training and development, and career progression of our employees in a fair and unbiased manner, solely on the basis of objective criteria, individual merit and ability.
- monitoring wherever practicable, the age, race, disability, gender, religion or belief or sexual orientation of job applicants and use this information to monitor the effectiveness of our policies.
- take positive action to ensure the demographic of our workforce reflects the diversity of the community in which they work.
- take positive action to attract under-represented groups through targeted marketing activity.
- make reasonable adjustments* to meet the needs of disabled and non-disabled job applicants and employees.
- interview all disabled applicants who meet the minimum criteria for a job vacancy and consider them on their abilities.
- discuss with disabled employees annually what we can do to make sure they develop and use their abilities.
- make every effort when employees become disabled to make sure they stay in employment.
- facilitate special training or support to enable employees to progress within the Company.
- provide flexible working arrangements for staff.
- monitor provision of training and development opportunities for staff to ensure equal access.
- rigorously address concerns about bullying, harassment or victimisation through our Grievance, Discipline & Dismissal policies.
- ensure that terms and conditions of employment, procedures for redundancy and dismissal are free from all forms of direct or indirect discrimination.

*To make a request for a reasonable adjustment as an Ixion employee, please contact: HR.Recruitment@ixionholdings.com or HR.Mailbox@ixionholdings.com

Ixion as a Service Provider

Ixion delivers a wide range of programmes and services to customers from different backgrounds and communities. To ensure equality of opportunity we will:

- ensure information about our programmes is accessible by providing marketing material in 'plain English', using different methods of communication, and working with other partners to promote improved access to potential customers.
- provide information in different formats where required.
- ensure our admissions/referral process is clear and does not create unnecessary barriers to participation.
- provide a safe and welcoming environment.
- assess customers' individual needs and ensure resources are available to meet these needs, including access to specialist support services to address the needs of different groups e.g. people with health problems, ethnic minority groups, (ex) offenders etc.
- make reasonable adjustments to ensure all customers are able to fully participate and achieve their goals.
- embed equality and diversity issues into service delivery to raise customer awareness and promote good citizenship and British Values.
- provide access to fair assessment, including for customers with learning difficulties, those who undertake shift work or are single parents.



- challenge discrimination and negative behaviour and empower customers to do so.
- gather and analyse equality data for recruitment and performance and take positive action to address gaps in achievement between different groups to achieve parity of outcomes for all customers.
- celebrate success to promote equality and diversity and encourage others to achieve.
- consult customers regularly about equality and diversity to inform continuous improvement.
- consult and engage community groups and other external stakeholders in planning and delivering our services.
- provide appropriate channels for customers to raise and complaints or grievances.

Ixion reserves the right to withdraw services to any service user if that person behaves in a discriminatory, disruptive or abusive manner to any member of staff, volunteer, service user or other person.

Some customers may find it difficult to fully comply with all aspects of our Equality & Diversity policy due to previous or present distress, illness or as a result of social exclusion. Where this is the case we will challenge inappropriate behaviour while intervening to alter attitudes and behaviour while maintaining support.

Ixion as a provider of ESF and Match Funded provision in England for 2014-2020

As a service provider for the commissioners DWP/ESFA, HMPPS and Big Lottery, Ixion and our supply chain partners will adhere to the requirements for 'Cross Cutting Themes' and 'Horizontal Principles' which both incorporate the support and promotion of equal opportunities and gender equality on ESF Funded programmes, meeting these requirements will include:

- Ensuring the principles of equal opportunity are embedded in our service delivery and promotion of gender equality, ensuring that programmes/buildings are fully accessible for disabled people in line with the 2010 Equality Act
- Monitoring the impact of our equality opportunity policies across the provision we are delivering in line with the ESF programme targets to include actions to address increase participation from under-represented groups and evaluation of the success of any such initiatives
- Promoting the ESF Gender Equality/Equal Opportunities awards held during Festival of Learning week both internally and to supply chain partners
- Developing a project specific Diversity and Equality Plan which comply with contractual requirements
- Provide workforce monitoring data at a contract level
- Ensuring there is a current equality and diversity policy in place with a discrimination complaints procedure in place (see Complaints section)
- Supporting and be involved in any equality analysis assessments undertaken by the commissioners



Ixion as Supply Chain Manager

In the delivery of our services, Ixion will purchase goods and services through other organisations, on a spot purchase basis as well as through subcontract arrangements. We will:

- ensure that the way we purchase goods, services and facilities reflects our commitment to equality and diversity through our choice of suppliers and in our contract arrangements.
- widely publicise partnership opportunities to engage diverse organisations and promote social inclusion and sustainable development.
- audit the equality and diversity policies of our suppliers and partners to ensure they are robust, regularly reviewed and updated.
- conduct regular monitoring visits to subcontractor delivery sites to monitor their compliance with equality and diversity policies.
- support suppliers to develop effective equality and diversity policies where they do not exist.
- agree equality and diversity improvement activities and targets with our suppliers where appropriate.
- monitor the diversity of our supply chain and take positive action to attract under-represented organisations e.g. female or BME owned businesses.
- share best practice throughout our supply chain and provide regular updates on equality and diversity issues.

Rights of Disabled People

Ixion attaches importance to the needs of disabled people.

Under the terms of this policy, managers are required to:

- Make reasonable adjustment to maintain the services of an employee who becomes disabled, for example, training, provision of special equipment, reduced working hours. (NB: managers are expected to seek advice on the availability of advice and guidance with the support of the Head of Service HR from external agencies to maintain disabled people in employment);
- Never exclude disabled people from training/development programmes;
- Give full and proper consideration to disabled people who apply for jobs, having regard to making reasonable adjustments for their aptitudes and abilities to allow them to be able to do the job.

Complaints

Where employees, customers or partners experience any form of discrimination, harassment, bullying or victimisation, they must report this to their line manager or local site manager, and raise a complaint through Ixion's Grievance process (for staff) or Feedback & Complaints process (for customers). If it is not appropriate to do so, they must contact the Group Finance & Corporate Services Director who will support them in taking forward their complaint. All allegations of unacceptable behaviour or working practice will be investigated thoroughly and dealt with appropriately.



If an employee, customer, supplier or partner organisation believes they have observed a colleague experiencing or perpetrating any form of discrimination, harassment, bullying or victimisation, they must bring this to the attention of their manager or the Group Finance & Corporate Services Director who will investigate and take the case forward in line with our Discipline & Dismissal Policy.

Responsibilities

All staff and delivery partners have a responsibility to uphold the commitments in this policy, specific responsibilities are as follows:

- Chief Executive – responsible for ensuring that sufficient resources are available to facilitate the effective implementation and maintenance of this policy; incorporating the promotion of equality into corporate planning; establishing annual equality and diversity objectives (see Appendix 2).
- Senior Management Team – responsible for implementing this policy throughout the business:
 - ensuring all corporate processes and practices (including recruitment, development and other personnel practices) promote fair and equal treatment;
 - conducting impact assessments for their contract areas;
 - delivering on our equality objectives;
 - providing advice and support on equality and diversity issues to their managers;
 - undertaking monitoring activities to ensure the effective implementation of the policy.
- All employees – responsible for complying with this policy in all of their dealings with customers, suppliers, partner organisations, local communities, and with each other.

Monitoring & Review

Ixion will implement a programme of monitoring to assess the effectiveness of this policy.

- The Head of Service HR will monitor on an annual basis recruitment, selection, learning and development activity against protected characteristics to assess the equality of opportunity afforded to staff, and the diversity balance achieved in our workforce.
- The Group Finance & Corporate Services Director will monitor customer satisfaction relating to equality and diversity and to the service received on an annual basis via customer surveys and focus groups. Monitoring will be by demographic breakdown where possible to assess whether there is any difference in the service being received by different groups of people.
- Ixion routinely collects and analyses information on employees and customers by gender, marital status, ethnic origin, sexual orientation, religion/beliefs, grade and length of service in current grade. Information regarding the number of staff and customers who declare themselves as disabled is also maintained.
- Data on customer recruitment, retention and achievement will be analysed and evaluated by demographic breakdown on a quarterly basis to consider the parity of starts, outcomes and retention between different groups.
- An annual review of the diversity of our supply chain will be carried out by the Head of Group Subcontracting & Policy.
- The Board will review progress against our agreed annual objectives (see Appendix 2) on a quarterly basis.



- Review progress against our action plans to maintain and build upon our company accreditations for 'Committed 2 Equality' and 'Disability Confident'

The Group Finance & Corporate Services Director will review this policy on an annual basis to ensure that all updates to legislation are reflected, and emerging best practice adopted, and will report back to the Board on the effectiveness of the policy to inform the agreement of new objectives and general recommendations for improvement if required.

Appendix 1 - Legislation & Definitions

Ixion fully accept our responsibilities and adhere to all UK equality legislation including but not limited to:

- Equality Act 2010
- Rehabilitation of Offenders Act 1974
- Protection from Harassment Act 1997
- Human Rights Act 1998
- Sex Discrimination (Gender Reassignment) Regulations 1999
- Racial and Religious Hatred Act 2006
- any Codes of Practice issued by the Equality & Human Rights Commission
- any amendments to the above legislation

The definitions applied in this policy are as follows:

British Values:

The Ofsted definition of British Values in education are:

- democracy
- the rule of law
- individual liberty
- mutual respect for and tolerance of those with different faiths and beliefs and for those without faith.

Direct Discrimination: where one person is treated less favourably than others because of a protected characteristic.

Direct Discrimination by Association: treating someone less favourably than another person because they are associated with a person who has a protected characteristic.

Indirect Discrimination: the application of a policy, criterion or practice which is discriminatory in relation to a protected characteristic and:

- (a) it isn't applied to someone with whom the individual doesn't share the characteristic
- (b) it puts, or would put, that group at a particular disadvantage compared to those who don't have the characteristic
- (c) it is not a proportionate means of achieving a legitimate aim.

Positive Action: where members of a protected group are under-represented, action can be taken to encourage people belonging to that group to take advantage of opportunities for training or work experience, or encourage them to apply for a particular job.

Diversity: the full range of individual values, attitudes, cultural perspectives, beliefs, ethnic background, sexual orientation, skills, knowledge and life experience in any given group of people. Valuing diversity means recognising, understanding, and appreciating these differences and developing an environment that enhances their value.

Reasonable Adjustments: discrimination occurs when a company fails to:

- take reasonable steps to avoid a provision, criterion or practice puts a disabled person at a substantial disadvantage compared to people who are not disabled; this includes formal and informal policies, rules, practices, arrangements or qualification including one-off decisions and actions.
- remove or alter a physical features or provide a reasonable means of avoiding a feature e.g. building design, access, fixture/fitting, furniture or equipment where it puts a disabled person at a substantial disadvantage compared to people who are not disabled;
- provide auxiliary aids or services where this is the only thing that would put the disabled person at a substantial disadvantage;
- provide information in an accessible format.

Harassment: unwanted behaviour related to a protected characteristic which has the purpose or effect of violating someone's dignity or which creates a hostile, degrading, humiliating or offensive environment.

Victimisation: treating someone unfavourably because they have taken some form of action relating to the Equality Act e.g. made a complaint under the Act or supported somebody who is doing so, such as appearing as a witness.



Appendix 2 – Equality & Diversity Objectives 2017/18

The following objectives have been agreed by the Ixion Board:

1. Achieve Clear Assured status to show our commitment to removing barriers from recruitment policies, processes and practices which have the potential to exclude disabled people.
2. Maintain and build on our 'Committed 2 Equality' and 'Disability Confident' Employer accreditation to evidence our commitment to equality and diversity and in particular disabled job applicants and employees.
3. Implement full and effective workforce monitoring system to inform diversity strategy and targets.
4. Engage partners with specialist knowledge and experience of diversity issues (including sexual orientation and gender reassignment) to inform policies and practices and support our delivery.
5. Establish effective data collection and analysis systems for service user information and implement Equality Diversity Impact Measures (EDIMS) for all contracts to tackle underperformance of different groups.



2017/18 Ixion Equality and Diversity Delivery /Action Plan

Ixion Holdings and its Supply Chain Partners have a duty to prevent unlawful discrimination and promote equality and must always be seen to be actively promoting equality of opportunity for, and good relationships between, all persons from the protected characteristic groups covered by the Equality Act: Age; Disability; Gender Reassignment; Marriage and Civil Partnership; Pregnancy and Maternity; Race; Religion or Belief; and sexual orientation. The below sets out actions Ixion will take during 2016/17 to support our duty to promote equality.

E & D Objective	Actions	Lead	Supporting Evidence
Effective use of data: Ensuring we analyse data to review current participation and identify underrepresented groups	1. Workforce Monitoring Data: HR to collect, analyse and report on equality and diversity within the Ixion workforce	Janet Young, Head of HR	
	2. Individual Contract Performance: Head of Data to analyse and report on participation data of the client /learner base within each funding contract	Richard Baldwin, Head of Data	
	3. Improving Contract Performance: Based on the above analysis of data, agree Equality and Diversity Impact Measures (EDIMs) by funding contract	Contract Managers	
	4. Evaluation: Through the SG /E&D Champions Group, review and analyse E&D		

	reporting mechanisms and evaluation impact of EDIMs	Jo Sears, Chair of SG/E&D Champions Group	
Learner and Client Voice: Servicing the needs of our customers	1. Trial Equality Impact Assessments on specific cohorts of clients /learners	Jacqui Oughton, Chief Operating Officer (Skills, Employability & Enterprise) Lisa Bishop- Assistant Justice Director	
	2. Through client /learner survey, ensure we are servicing the needs of the learner and client base	Jacqui Oughton, Chief Operating Officer (Skills, Employability & Enterprise) Lisa Bishop – Assistant Justice Director	
	3. Because of our Workforce Monitoring ensure our workforce represents/supports the diversity of our learner/ client base on funded contracts	Janet Young, Head of HR	
	4. 'Reasonable adjustments' are made to make our services	Contract Managers / Head of IT	

	accessible to disabled customers including the provision of specialist IT equipment		
Supply Chain Management: Ensuring our partners are meeting the equality and diversity needs of their clients	1. E&D performance targets / reviews to be undertaken at monthly supplier performance meetings	All Supply Chain Managers/Contract Managers	
	2. Suppliers to collect, analyse and report on equality and diversity impact measures (EDIMs)	All Supply Chain Managers/Contract Managers	
	3. Review and feedback on all Supply Chain Partners Policies for Equality & Diversity and Bullying & Harassment	Policy Champion – Rachael White	
	4. Support the Supply Chain Partners to produce their contract level E & D Plans in a timely nature based on commissioner’s timescales, and ensure these contribute towards the overall Ixion E&D Plan submitted to the commissioners	Contract Managers	
Accreditations: Ensuring best	1. Communication/Promotion of the E&D Accreditations achieved	Jo Sears, Chair of SG/E&D Champions Group	

practice within the business	2. Implement any action plans to ensure re-accreditation and development of practices		
	3. Through the SG/ E & D Champions Group, review best practice/other accreditations and adopt best practice accordingly	SG / E&D Champions Group	
Staff Training	1. CPD – Ensure all staff undertake the annual mandatory online training for Equality & Diversity	Head of H.R – Janet Young	