

## Cambridge Spark Equality, Diversity & Inclusion Policy

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<b>Change History</b>			
<b>Issue</b>	<b>Issue Date - Version No.</b>	<b>List of changes or remarks</b>	<b>Change owner:</b>
1	October 2018 - 1.0	Created	Judit Gorog
2	November 2020 - 2.0	Review of existing policy to capture updated requirements	Darren Vidler
3	March 2021 - 3.0	Review of existing policy to capture updated requirements	Judit Gorog
4	July 2021 - 4.0	Consolidation of Equality, Diversity & Inclusion into single policy document	Darren Vidler
5	November 2022 - 5.0	Reviewed and wonder of policy updated	Samantha Hackett

## **Our commitment to Equality, Diversity & Inclusion**

Cambridge Spark Ltd recognises, and is committed to, promoting equality, diversity & inclusion across our business and in our interactions with clients and learners. We are also committed to affording equality of opportunity to our employees, apprentices and other users of our services.

This policy is intended to assist Cambridge Spark to put this commitment into practice. Our commitment to this policy should also ensure that employees do not commit unlawful acts of discrimination.

It is our policy that no applicant, apprentice, employee or other user of our services shall be treated differently based on any of the following:

- Race, colour or ethnicity
- Ability or disability
- Gender or gender reassignment status
- Sexual orientation
- Marital status
- Religion
- Age
- Beliefs or non-beliefs

We embrace the diversity of our applicants, apprentices, employees and other service users and will work to support our service users' individual needs where possible. We do recognise that society still contains inequality and that some individuals may be treated differently based upon their:

- Race, colour or ethnicity
- Ability or disability
- Gender or gender reassignment status
- Sexual orientation
- Marital status
- Religion
- Age
- Beliefs or non-beliefs

## **Policy Statement**

It is Cambridge Spark's policy that we will:

- Deliver a high standard of service to all applicants, apprentices, employees or other service users in a non-discriminatory manner and within the relevant legal framework(s) as set out later in this document
- Ensure that our services are accessible and inclusive to all applicants, apprentices, employees and other service users
- Promote equality, diversity and inclusion through our services and practices and ensure that we challenge forms of harassment and/or discrimination
- Provide a fair and informed recruitment process leading to fair and informed decisions

- Harbour a culture that welcomes and promotes equality, diversity & inclusion across the business, our services and our clients, recognising and making best use of skills and talents

### **Legal Framework**

We will work within the confines of the Equality Act 2010 and the preceding legislation which has been absorbed within that Act including, but not limited to, the below:

- Equal Pay Act 1970
- European Communities Act 1972
- Sex Discrimination Act 1975
- Gender Reassignment Regulations 1999
- Gender Reconstruction Act 2004
- Gender Equality Duty 2007
- Sexual Orientation Employment Regulations 2003
- Race Relations Act 1976
- Race Relations Act Amendment Act 2000
- Religion / Belief Employment Regulations 2003
- Disabled Persons (Employment) Act 1944 and 1958
- Disability Discrimination Act 1995 and 2005
- Disability Equality Duty 2006
- Age Discrimination Legislation 2006
- Rehabilitation of Offenders Act 1974
- Human Rights Act 1998
- Public Interest Disclosure Act 1998

As per the Equality Act 2010, it is against the law to discriminate against anyone because of the following protected characteristics:

- age
- gender reassignment
- being married or in a civil partnership
- being pregnant or on maternity leave
- disability
- race including colour, nationality, ethnic or national origin
- religion or belief
- sex
- sexual orientation

Discrimination after employment may also be unlawful, e.g. refusing to give a reference for a reason related to one of the protected characteristics.

## **Equal opportunities in employment**

Cambridge Spark will avoid unlawful discrimination in all aspects of employment including:

- recruitment
- promotion
- opportunities for training
- pay and benefits
- discipline
- selection for redundancy

In addition, they will avoid unlawful discrimination in all aspects of the services it provides to apprentices, learners and employers.

Person and job specifications will be limited to those requirements that are necessary for the effective performance of the job. Candidates who contact us for potential employment or promotion will be assessed objectively against the requirements for the job, taking account of any reasonable adjustments that may be required for candidates with a disability. Disability and personal or home commitments will not form the basis of employment decisions except where necessary.

Cambridge Spark will consider any possible indirect discriminatory effect of its standard working practices, including the number of hours to be worked, the times at which these are to be worked and the place at which work is to be done, when considering requests for variations to these standard working practices and will refuse such requests only if the business considers it has good reasons, unrelated to any protected characteristic, for doing so. Cambridge Spark will comply with its obligations in relation to statutory requests for contract variations and will also make reasonable adjustments to its standard working practices to overcome barriers caused by a disability, difficulty or additional needs

Where possible or known, Cambridge Spark monitors the ethnic, gender and age composition of the existing workforce and of applicants for jobs (including promotion), users of the service and the number of people with disabilities within these groups, and will consider and take any appropriate action to address any problems that may be identified as a result of the monitoring process.

## **Safeguarding**

Cambridge Spark has a separate safeguarding policy concerning issues of bullying, harassment or harm which outlines how complaints of this type will be dealt with.

## **Training**

Cambridge Spark recognises the need for all employees, including the senior leadership team, to be aware of and have an understanding of this policy and their obligations as representatives of the business.

All employees and senior leadership team members will be required to read this policy and declare their understanding via our HR system's document library.



## **Staff responsibilities**

Every employee is required to assist Cambridge Spark to meet its commitment to provide equal opportunities in employment and avoid unlawful discrimination. Employees can be held personally liable as well as, or instead of, the business for any act of unlawful discrimination. Employees who commit serious acts of harassment may be guilty of a criminal offence.

Acts of discrimination, harassment, bullying or victimisation against employees or customers are disciplinary offences and will be dealt with under the company's disciplinary procedure. Discrimination, harassment, bullying or victimisation may constitute gross misconduct and could lead to dismissal without notice. Additionally, Cambridge Spark expects employees to, at all times, uphold the standards of professional integrity and impartiality in dealing with applicants, apprentices, fellow employees and any other service user(s).

If any member of staff has questions or concerns regarding their responsibilities, or the policy in general, they should speak to their line manager or the Cambridge Spark Designated Safeguarding Lead.

## **Harassment**

All allegations of harassment are taken very seriously by Cambridge Spark and the approach for reporting any grievances under the terms of this policy are detailed in the section below.

Cambridge Spark asserts that it is the right of all applicants, apprentices, employees and other service users to be treated with consideration and to operate in an environment free from harassment, bullying, intimidation and discrimination.

## **Grievances**

If you consider that you may have been unlawfully discriminated against, you may use the Cambridge Spark Grievance Procedure to make a complaint. If your complaint involves bullying or harassment, the grievance procedure is modified as set out in the Cambridge Spark Safeguarding Policy.

Cambridge Spark will take any complaint seriously and will seek to resolve any grievance that it upholds. You will not be penalised for raising a grievance, even if your grievance is not upheld, unless your complaint is both untrue and made in bad faith.

Use of the Cambridge Spark Grievance Procedure does not affect your right to make a complaint to an employment tribunal.



## **Whistleblowing**

The Public Interest Disclosure Act (PIDA) 1998, and subsequently the Enterprise and Regularity Reform Act 2013, protects a member of staff against detriment or dismissal for raising concerns about matters in the public interest. The Act seeks to ensure that any person suspecting malpractice knows how to raise concerns and that organisations have procedures in place to deal with the concern. Cambridge Spark is committed to creating an open and transparent environment where members of staff feel comfortable in raising concerns they have. Procedural intricacies in relation to Whistleblowing are outlined within the company Whistleblowing Policy.

## **Monitoring and review**

Cambridge Spark recognises that continual monitoring of equal opportunities is essential to ensuring the continued effectiveness of this, and related, policies. This policy will be monitored on an annual basis or as an incident arises, whichever is most frequent. Its effectiveness will be evaluated and kept up to date in accordance with changes in the law.

For employees, applicants, apprentices and service users the business will monitor:

- ethnicity statistics
- gender statistics
- disability statistics
- other diversity statistics as appropriate

This Equality & Diversity Policy, and any related processes, will be reviewed in accordance with the results shown by the monitoring. If changes are required, Cambridge Spark will implement them.

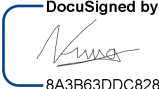
Cambridge Spark treats personal data collected for reviewing equality of opportunity in recruitment and selection and use of its services in accordance with its data protection policy and GDPR. Information about how data is used and the basis for processing is provided in the company job applicant privacy notice or the company privacy notice.

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## **Senior Manager Sign-off**

Name: Raoul-Gabriel Urma

Title: CEO

Signature:   
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Date: 15/11/2022