

Equality, Diversity and Inclusion Policy

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Apprentify – EDI – Equality, Diversity and Inclusion Strategy

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Executive Summary

Apprentify is the UK's leading digital and tech training provider, helping businesses close skills gaps and boost productivity with future-focused programmes. We specialise in areas like AI, data, tech and IT, working to upskill organisations for tomorrow's challenges.

Apprentify stands out through a proactive, partnership-led approach: we listen first, then build flexible, tailored solutions that align with each client's goals. We offer the confidence and security of an Ofsted Outstanding provider, paired with the energy, innovation and forward thinking of a digital-first, value-led business.

This strategy strengthens our commitment to inclusion and diversity, aligning with Ofsted's updated Education Inspection Framework (EIF) priorities:

- Safeguarding (met/not met)
- Inclusion
- Curriculum & teaching
- Achievement
- Attendance & behaviour
- Personal development & wellbeing
- Leadership & governance

It introduces measurable KPIs, employer accountability, apprentice voice mechanisms and digital inclusion strategies to ensure full compliance and effectiveness. This strategy ensures compliance with the Equality Act 2010, SEND Code of Practice, our internal quality framework and Ofsted requirements, while promoting fairness, respect, and opportunity for all.

Purpose and Vision

This strategy sets out our commitment to creating an intentionally inclusive learning and working environment in which all apprentices feel valued, safe, nurtured and respected so that they achieve their best and grow as individuals within the workplace and within society.

In accordance with the Equality Act 2010, we will eliminate discrimination, harassment and victimisation, advancing equality of opportunity by fostering good relationships between staff, learners and line managers/companies. We will work to ensure that those apprentices with protected characteristics are not placed at a disadvantage in relation to recruitment, admission, on boarding, curriculum delivery, assessment, progression and destination.

This strategy supports Apprentify's purpose of transforming lives through the power of education and training. It is anchored within our mission statement being 'This is your opportunity'. We must ensure that every learner included within the below is not disadvantaged by their life experiences/personal learning need. And where there are barriers, we will endeavour to support using internal provision or signpost to external providers.

A barrier to learning is any factor that limits, delays or prevents a learner from fully accessing, engaging with or benefiting from education or training, or from making expected progress and achieving their potential.

Barriers may be temporary or long-term, academic, personal, contextual or environmental, and may affect learning, attendance, wellbeing, confidence or participation.

Importantly, barriers are not limited to SEND or safeguarding concerns and may arise from a learner's circumstances, prior experiences, responsibilities, health or the way learning is structured or delivered. Below are examples of where barriers may exist within our apprentice's learning journey.

- Apprentice with SEND or High needs
 - Apprentices with diagnosed SEND
 - Those receiving additional learning support
 - Apprentices with Education, Health Care Plans (EHCPs)
- Disadvantaged Apprentices
 - Low-Income backgrounds
 - Households previously eligible for Free School Meals
- Apprentices known to Social Care or Youth Justice Services
 - Looked-after children
 - Care-experienced apprentices
 - Apprentices known to children's social care
 - Those with involvement in youth justice
- Apprentices facing other barriers to learning and wellbeing
 - Poverty-related barriers
 - Mental Health difficulties
 - Unmet or newly emerging support needs
 - Cultural or workplace-related barriers
- Apprentices from Underrepresented or Vulnerable Groups
 - Young Carers
 - Neurodiverse apprentices
 - Those experiencing discrimination or bias in the workplace

- Additional barriers that are not covered by conventional descriptors
 - Pregnancy-related health needs or appointments
 - Maternity or shared parental leave
 - Return-to-learning transitions
 - Childcare pressures
 - Caring for siblings, children, partners or family members
 - Apprentices who have not achieved functional skills or GCSEs
 - Low prior attainment affecting confidence, assessment progression or completion
 - Anxiety or disengagement linked to previous negative experiences of English or maths
 - Repeated resits or delays that affect overall achievement timelines

Up to date data and information can be found within Bud.

Strategic Priorities for Inclusion

- Design, build and implement robust reporting system to represent learner and staff data of potential disadvantages and protected characteristics and reporting software to include further procedures and data.
- Ensure reporting procedures for ALS learners are managed effectively to ensure learners who require support, receive it in a timely manner.
- Put strategies in place to remove barriers by addressing differential gaps in progression, award and learner outcomes by working with staff, learners and employers to ensure an open dialogue.
- Embed transparency by sharing EDI data and EDI/Accessibility related best practice with employer partners to inform inclusive practice.
- Invest in staff training on inclusion, inclusive leadership, accessibility, disadvantaged learner backgrounds, support we can offer and Neurodiversity awareness.
- Put systems in place to ensure learners are aware of the support that they can receive to ensure that they make a well-informed decision.
- Expand pathways for 16–19-year-olds and underrepresented groups through outreach and partnerships with FE providers.
- Establish apprentice voice forums and representation governance.

Governance and Leadership

The Inclusion Lead is responsible for implementing this strategy, supported by all staff who are expected to uphold our values, prevent discrimination and promote a culture of belonging for all staff and learners. Inclusion is embedded in our Quality Assurance processes and Self-Assessment Reports. Senior leadership receives quarterly updates on inclusion KPIs, including learner retention and achievement rates and Inclusion is an integral part of both the Self-Assessment Report (SAR) and the Quality Improvement Plan (QIP); Evidence is updated on these project boards on Monday.com regularly for senior stakeholders to see evidence of improvement.

Apprentify collects equal opportunities data from all staff to build an accurate understanding of workforce demographics. This enables analysis of representation and trends across key groups, identification of areas for improvement, and the setting of meaningful, evidence-based diversity and inclusion targets.

This data-led approach supports monitoring over time and ensures our policies, practices and initiatives remain fair, inclusive and aligned with best practice.

Identification and Support

Early Identification

Preenrolment questionnaires, diagnostic assessments, and “Needs First” conversations to identify SEND, neurodiversity, mental health needs, and barriers to learning, outlined earlier in the strategy.

We are consistently reviewing best practice and supporting our coaches, trainers and wider community of staff to support each other and apprentices in the best way possible, this is done through CPD, regular communications and leading by example.

Screening aligned to the SEND Code of Practice’s emphasis on *graduated response cycles* (Assess–Plan–Do–Review).

Inclusion Support Plan (ISP)

Every learner with identified needs receives a personalised ISP detailing:

- Required reasonable adjustments
- Learning preferences
- Assistive technology
- Exam/capacity adjustments

ISPs reviewed at least every 12 weeks.

Where an ISP is not necessary but there are identified barriers in place, coaches and trainers are provided with information and CPD to best support the apprentice through our EDI Learning Hub - [2. Neurodiversity and SEND Advice & Support](#)

Specialist Support

Referral pathways to external agencies (e.g., local authority SEND teams, mental health services), reflecting sector practice in FE. Using the following document, staff can quickly identify reporting pathways to signpost apprentices to external partners that is currently not offered as part of our internal provision, this is hosted on the EDI Learning Hub.: [External Partners & Support Offered Information Sheet.pdf](#)

Access to Apprentify's SEND Specialists or SEND Champions.

Employer Engagement

Clear communication of learners needs to employers, ensuring legal compliance and enabling them to fulfil their duty to provide workplace adjustments.

Apprentice

Apprentices go through an onboarding process with the Talent team. The below information and evaluation criteria consider how leaders and staff within Apprentify identify and support the needs of learners and apprentices, these include:

Taken from the Ofsted Framework: [Further education and skills inspection toolkit](#)

Key factors to be aware of when onboarding learners, taken directly from the Ofsted toolkit.

Staff

Staff currently carry out onboarding using our HR System and receive an equal opportunities questionnaire. The data being collected within is hosted within our HR System.

Inclusive Curriculum and Teaching

Our curriculum is designed embedding learning principles, ensuring flexibility and accessibility. Teaching staff differentiate instruction and assessment methods to meet

diverse needs. The functional skills/Inclusion team will be on hand to assist with recommendations throughout the design/implementation process.

Drawing from the Inclusive Employers Framework and FE Research findings on curriculum inclusion:

Universal Design for Learning (UDL)

- Curriculum designed to offer multiple means of representation (visual, audio, text), engagement and expression.
- All learning materials must meet WCAG 2.2 accessibility standards.

Inclusive Pedagogy

- Adaptation of delivery style, pace, and examples to reflect cultural, social and learning diversity.
- Ensuring apprenticeship standards are taught in ways that reflect diverse identity groups.

Assessment Flexibility

- Alternative assessments, **where appropriate**, including:
 - o Recorded evidence
 - o Practical demonstrations
 - o Assistive technology
 - o Interpretation aids

Digital Inclusion

- Ensuring no learner is disadvantaged by digital poverty or inaccessible digital tools we will endeavor to work alongside their employer to ensure that they have access to all digital devices required.

We have a dedicated skills support team who work with learners who have additional learning needs and put strategies in place to ensure that they are not disadvantaged when it comes to learning.

The team is currently:

Personal Development and Inclusion Lead – Strategic Oversight

Functional Skills Manager

Additional Learning Support Manager

Inclusion Coach(es)

All learning materials are available in accessible formats, and digital platforms. This is continuing to be reviewed as we develop more learner content, use third party content and become aware of new accessibility software.

Recruitment and Selection

Our aim is to ensure that no job applicant or learner suffers discrimination regarding any of the protected characteristics.

We review our recruitment and induction procedures regularly to ensure that we treat individuals based on their relevant merits and abilities. We review job selection criteria regularly to ensure they are relevant, and we take steps to reach a diverse labour market with our job advertisements, which avoid stereotyping, or wording that may discourage groups from applying.

We do not ask applicants about health or disability before making a job offer. Post-job offer to ask candidates to volunteer their personal medical information to ensure that we can fully support them in their job role.

Neither do we ask applicants about:

- Past or current pregnancy or future intentions related to pregnancy.
- Any matters concerning any of the protected characteristics.

The law requires us to ensure that all employees are entitled to work in the UK, and not to make assumptions about immigration status based on appearance or apparent nationality.

To satisfy immigration legislation, all prospective staff – of any nationality – must be able to produce original documents (such as a passport) before employment starts.

Reporting pathways

Apprentify Limited and Apprentify Group support a truly inclusive learner experience. All employees must treat one another with respect and dignity.

Where this has not happened, staff should consult the Dignity at Work policy, [AGL Dignity at Work Policy.docx](#)

Where this has not happened for apprentices, they should discuss it with the Development Coach in the first instance. If it is about their development coach, they

should then escalate to Head of Quality - Who will then escalate it to the Operations Director if necessary.

Staff Training and Development

All staff complete mandatory SEND and inclusion training during induction. We provide ongoing CPD on inclusive pedagogy, mental health awareness, and reasonable adjustments. SEND specialists are available for consultation and mentoring.

The Head of Enablement is responsible for organising CPD within Apprentify Limited. They liaise with subject matter experts to lead training regularly for all staff including but not limited to operations, quality, coaches and trainers.

The CPD schedule can be found on SharePoint.

We also have an EDI Learning Hub, which is introduced to all staff during onboarding and embedded into ongoing EDI training to support continuous learning and good practice. Link here: [EDI Learning Hub - Home](#)

Mandatory Training

All staff receive training on:

- SEND awareness and accessibility (both digital and physical)
- Equality, Diversity and Inclusion
- Reasonable Adjustments

Further CPD

- Anti-Discrimination
- Inclusive Communication and Inclusive Language
- Cultural Competence
- Unconscious Bias

Advanced CPD for educators that is available to those who require it

- Differentiated teaching methods
- Designing accessible resources
- Inclusive coaching techniques

- Supporting apprentices with complex needs

Evaluation

Training impact measured through learner outcomes, satisfaction and quality assurance audits carried out by the Quality team.

Learner voice and engagement

We aim to seek feedback from learners with SEND through surveys, focus groups, and learner forums. Their input will inform improvements in teaching and support. We provide tailored transition support for learners moving into employment or further education.

Structured Feedback Channels

- SEND-specific surveys
- Apprenticeship focus groups
- Digital suggestion platforms
- Regular apprentice forums (mirroring Skills England learner engagement and participation approaches) [skillsengland.gov.uk]

Representation & Co-creation

- Inclusion of SEND apprentices in co-design of curriculum materials and workshops.
- Learners co-review adjustments and ISPs every 12 weeks.

Safe and Anonymous Reporting

- Clear reporting systems for discrimination, harassment, or accessibility concerns through the Complaints procedure or Quality Concern form.

Training, Promotion and conditions of service

We identify training needs through our initial assessment process, regular reviews and annual appraisals, and our aim is to give all staff access to the training they need to perform well and progress within Apprentify Group and its subsidiaries.

- We make all promotion decisions based on merit.
- We review our conditions of service regularly and examine the benefits and facilities we offer to confirm that there are no unlawful obstacles preventing all relevant people from accessing them.
- All staff are required to complete an online Equality and Diversity upskill/refresher course per annum.

Termination of employment

We ensure that redundancy criteria and procedures are fair and objective and are in no way biased or discriminatory.

We also apply our disciplinary procedure and penalties fairly and equitably, treating everyone the same when it comes to warnings, dismissal, or other disciplinary action.

Disability Discrimination

We monitor the physical features of our premises to make sure they don't place disabled employees, applicants and visitors, job applicants or visitors at a substantial disadvantage in relation to other staff. We do what we can to improve the experience for staff and others with any disability.

Fixed-term employees and associate workers

We monitor our use of fixed-term employees and associate workers, as well as their conditions of service, to ensure that we are offering appropriate access to benefits, training, promotion, and permanent employment opportunities. Where relevant, we monitor their progress to ensure they have access to permanent vacancies.

Employees with a disability

If you have, or develop, a disability, please tell us about your condition so that we can arrange to give you the right sort of support.

If you experience physical difficulties at work because of your disability, talk to your line manager about any reasonable adjustments that would help overcome or minimise the difficulty. The HR or Inclusion Team may then want to talk to you and your medical adviser(s) about possible adjustments.

Once we know all the facts, we will consider the matter carefully and try to accommodate your needs, within reason. If we decide that an adjustment is not reasonable, we will explain our reasons and try to find an alternative solution.

Harassment, Victimisation and Bullying

Policy

We do not tolerate harassment, victimisation or bullying in any circumstances. We regard them all as gross misconduct, so offenders are liable to dismissal.

Harassment is unwanted physical, verbal, or non-verbal conduct that intends to, or does, violate someone's dignity, or creates an intimidating, hostile, degrading or humiliating environment for them. It can be just a single incident.

Victimisation is the act of singling someone out for cruel or unjust treatment.

Bullying is seeking to harm, intimidate or coerce (someone perceived as vulnerable). It is unwanted, aggressive behaviour.

Child-on-child abuse is when children under the age of 18 sexually, physically or emotionally abuse another child. This is linked to our Safeguarding Policy.

Guidelines and procedure

What to do if you are the victim of bullying or harassment?

We take all allegations of victimisation, bullying and harassment extremely seriously. If you feel you are being targeted, follow the complaints procedure.

If the case is proved against an employee, we deal with the matter under our Disciplinary Procedure. If it is a third party, we take appropriate action.

Your right to appeal

If you are not satisfied with the outcome, you may appeal in writing to the Board of Directors within five working days of the decision stating your full grounds of appeal.

There is then an appeal meeting, normally within a week of receiving your appeal. It is dealt with impartially by someone who has not previously been involved in the case, usually a Director of Apprentify Group and its subsidiaries, although they may ask anyone previously involved to be present. As before, you have a right to bring a companion to the meeting.

We then confirm our final decision in writing, usually within a week of the appeal hearing. This is the end of the procedure and there is no further appeal.

Review

This policy will be reviewed annually or earlier if deemed necessary.