



**Equality and Diversity
Policy and Procedures**

2016/17

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General Policy Statement on Equality and Diversity

JTL is committed to a policy of equality and diversity for everyone, regardless of an individual's characteristics as defined by the introduction of the Equality Act 2010 as 'Protected Characteristics': race, colour, nationality, ethnic or national origin, religious belief, gender, age, gender reassignment, marriage or civil partnership, pregnancy and maternity.

No applicant for a training scheme place with JTL – learner, customer, client or member of staff – shall knowingly receive less favourable treatment on these grounds, nor will any other condition or requirement that cannot be justified disadvantage them.

NB: In respect of disability there are, however, health and safety regulations in force in the building services engineering sector to comply with certain standard fitness requirements. In addition, there are Government funding regulations that define the age limits for Advanced Apprenticeship eligibility with which JTL must comply.

All JTL staff will receive appropriate training on their obligations under the law in respect of equality and diversity and in the implementation of this Policy. In particular, JTL and its sub-contractors shall be required not to commit any act of discrimination that contravenes any of the Acts detailed in Section 8 of this Policy.

JTL managers and staff will be required to take ownership of this Policy, and all internal company policies, and recognise their duty to ensure all policies are upheld. Failure to do so may result in disciplinary action against them. Sub-contractors and learners shall also be made aware of their responsibilities and duties governed by this Policy, and any failure to comply with this Policy may result in the termination of their contract, or withdrawal from the JTL training programme.

Reference to JTL's Policy Statement on Equality and Diversity shall be included in written contracts or agreements for services with colleges, training centres, employers and learners. The Skills Funding Agency (SFA), the European Social Fund (ESF), the Welsh Government, careers offices and schools will also be made aware of this Policy.

JTL is committed to encouraging the building services engineering sector to understand the business case for valuing and encouraging a diverse workforce.

Date: 1st September 2016

Signed:



Jon Graham, Chief Executive

1. Introduction

- 1.1. This document is for all JTL staff, sub-contractors, employers and learners to help them understand their responsibilities in actively supporting JTL's commitment to equality and diversity. It is designed to give all concerned a greater understanding of what equality and diversity actually means and to encourage everybody to participate actively in its implementation.
- 1.2. JTL is committed to encouraging the building services engineering sector to continually reappraise its methods, and to support and value equality and diversity in order to ensure the continued success of the sector.
- 1.3. This Policy is implemented in conjunction with the Bullying and Harassment (JTL727), Safeguarding (JTL730) and Health and Safety (JTL803) Policies.

2. What is Equality and Diversity?

- 2.1 Equality is not about treating everyone the same. It is about treating people fairly. It is not acceptable to discriminate against anyone, or treat them less favourably, for reasons that cannot be justified. There exists a range of legislation which imposes a minimum standard of behaviour on employers and individuals. These Acts of Parliament bind everyone in England, Wales and Scotland.
- 2.2 **Diversity Statement:** Diversity means recognising that individual and professional differences are a natural part of society and can often create an opportunity for those who recognise them. Organisations that embrace variety, value difference, reject prejudice and understand and accommodate changing work patterns will be those organisations which will reap the rewards of a happy, fulfilled and motivated workforce with diverse skills. Diversity in this context means recognising that individual and group differences present opportunities to harness creativity and build continuous improvement.

Diversity occurs naturally. Everyone differs as individuals and on the basis of the social, professional and organisational groups they belong to. Managing diversity effectively means dealing with the spectrum and spread of human culture within the work environment. In essence, it focuses on how to use the differences between people to drive excellence and creativity in performance.

The Implementation of this Policy

3. Environment

- 3.1 JTL shall take steps to create a positive environment that is free from discrimination and harassment. It is JTL's ethos that the working environment is inclusive, open and respectful to all.

4. Advertising

- 4.1 JTL shall ensure that its advertising material is free from any indication of an intention to discriminate unlawfully.
- 4.2 JTL shall make every effort to encourage applications from all suitable candidates regardless of their protected characteristics with regards to disability (*see paragraph 6.5).
- 4.3 JTL staff shall encourage all interested and eligible people to apply for training, particularly those demonstrating an interest who have traditionally been under-represented in the building services engineering sector (see Section 10).

5. Recruitment and Selection

- 5.1 **Initial applications:** all applications for training or employment with JTL shall be monitored with regards to equality, in line with the Equality Act 2010 and stored in compliance with the Data Protection Act (1998).
- 5.2 **JTL Assessment:** any JTL assessments taken shall be specifically relevant to the requirements of the job or training scheme. All JTL assessments will be regularly reviewed to ensure that they remain relevant and free from any unjustifiable bias, either in content or in scoring.
- 5.3 Advice to employers: JTL advises employers recruiting learners under its training scheme that:
- selection interviews shall be conducted by more than one person where it is practical;
 - questions asked at the interviews shall relate to the requirements of the job or training scheme and must be consistently applied;
 - interviewers shall avoid making generalised assumptions on the grounds of race, colour, nationality, ethnic or national origin, religious belief, gender, disability, marital status, sexual orientation, domestic commitments or any other irrelevant factor;
 - it is recommended that records of interviews shall be kept for six months and must include the reasons why applicants are rejected.
- 5.4 **People with disabilities:** applications for employment or training from people with disabilities shall be considered as follows:
- there are health and safety regulations in force in the building services engineering sector to comply with certain standard fitness requirements;
 - when making decisions about a person's suitability for employment or training, account shall be taken of all the information available, including past assessments of the applicant's abilities and disability. Where appropriate, the professional opinion of a doctor may be sought;
 - where necessary, reasonable modifications shall be made to the selection process to remove any unintentional or unjustified disadvantage to an applicant with a disability.

6. Placing Learners with Employers

- 6.1 JTL shall use its best endeavours to assist any applicants in sourcing suitable employment opportunities.
- 6.2 Employers shall be required to comply with the statutory requirements of all relevant legislation. They are expected to follow the guidance provided in the relevant Codes of Practice as well as JTL's Equality and Diversity Policy. Employers are acting unlawfully if they instruct or put pressure on others to discriminate. JTL staff are acting unlawfully if they comply with such instructions or pressure.
- 6.3 When deciding upon a potential learner's suitability for placement with an employer, including the recommendation for training, the learner's personal characteristics or any other irrelevant factor shall not influence the decision (see paragraph 6.5).
- 6.4 JTL staff shall assist employers in obtaining any potential extra help by Government-funded agencies for the accommodation and training of people from under-represented groups.
- 6.5 **People with Disabilities:** Discussions with the applicant, and those who are responsible for his/her employment and training, shall be undertaken to explore how, if at all, the disability will affect his/her ability, and what changes may be required to enable him/her to do the job. An assessment will then be made as to whether any adjustments are reasonable. Where necessary, JTL will advise on the sources of potential specialist support, equipment or adaptation of premises.

NB: In respect of disability there are, however, health and safety regulations in force in the building services engineering sector to comply with certain standard fitness requirements.

7. Ex-Offenders

- 7.1 JTL shall make every effort to avoid unfair discrimination on the basis of unrelated criminal convictions. An individual's offending record may have no bearing on the training and/or employment under consideration. If there is any doubt as to whether the previous conviction(s) are relevant or not, it will be a matter of exercising judgement based on the facts of the offence (e.g. serious, if work-related or with a history of re-offending) and the nature of the training and/or employment sought.
- 7.2 When seeking information about offences, it is important that any information given by the applicant is not used against them in any way, and is only divulged to those who have a need to know.
- 7.3 The Rehabilitation of Offenders Act (1974) outlines that, except for certain exempt occupations, some minor convictions may be regarded as "spent" after a period of time. Such convictions must be disregarded when considering suitability for training/employment.
- 7.4 Due to the nature of the work that is performed by some JTL employees, JTL is registered with the Disclosure and Barring Service and reserves the right to have appropriate checks made.

8. Equality Legislation

8.1 JTL is committed to meeting its statutory obligations under the following legislation and codes of practice:

The Equality Act 2010 replaces the Equal Pay Act 1970, the Sex Discrimination Act 1975, the Race Relations Act 1976, the Disability Discrimination Act 1995, much of the Equality Act 2006, the Employment Equality (Religion or Belief) Regulations 2003, the Employment Equality (Sexual Orientation) Regulations 2003, the Employment Equality (Age) Regulations 2006, and the Equality Act (Sexual Orientation) Regulations 2007 (where applicable, as subsequently amended), plus other ancillary pieces of legislation.

The Equality Act 2010 covers nine protected characteristics:

- race;
- sex;
- disability;
- sexual orientation;
- religion or belief;
- age;
- gender reassignment;
- marriage and partnerships;
- pregnancy and maternity.

The Act prohibits unfair treatment in the workplace when producing goods, facilities and services, when exercising public functions in the disposal and management of premises, education and by associations.

8.2 Prevent Duty 2015

To have due regards to the need to prevent people from being drawn into terrorism.

All members of JTL staff, learners, sub-contractors and employers are encouraged to respect others with particular regard to the protected characteristics as set out in the Equality Act 2010: Promote Equality, Diversity, British Values, challenge stereotyping and discrimination.

9. Types of Unlawful Discrimination

Direct Discrimination: Treating one person less favourably than another because of certain protected characteristics, i.e. their race and/or gender, in any aspect of their employment, i.e. recruitment, appraisal or terms and conditions.

Associated Discrimination: It is currently unlawful to discriminate against or harass someone because they are 'linked to' or 'associated with' a person who is of another sexual orientation, race, or religion or belief. The Equality Act 2010 extends this to age, disability, sex, or gender reassignment.

Indirect Discrimination: Applying a requirement or condition which, whether intentionally or not, adversely affects any person, or member of a particular group, considerably more than others not of that group, and which cannot be objectively justified on any other grounds.

Harassment/Bullying: Any act that makes the recipient feel intimidated, embarrassed or humiliated can amount to unlawful discrimination as defined in the relevant legislation.

Sexual Harassment: Can be generally defined as unwanted, unreciprocated and unreasonable conduct or language of a sexual nature affecting the dignity of men and women at work. This is a form of direct sexual discrimination.

Examples of sexual harassment include:

- unwanted physical contact;
- pestering, in action, word or by communication;
- insults or ridicule;
- applying pressure, by threat or inducement, for sexual favours;
- the display or circulation of sexually explicit material.

Racial Harassment: Is any display of racial prejudice by word or conduct which is unwanted, unreasonable and offensive. This is a form of direct racial discrimination.

Examples of racial harassment include:

- derogatory comments and remarks;
- jokes and insults which are race-related;
- deliberately creating poor working conditions.

Victimisation: Disciplining or dismissing an individual who makes a complaint in good faith under any of the Equality Acts or this Policy, or who gives evidence in connection with proceedings brought under those Acts.

Any member of society can find all of the above offensive, not just those in minority groups.

10. Exemptions from Equality Legislation

- 10.1 Positive Action: The practice of identifying and removing real or perceived barriers that will disadvantage under-represented groups. This practice allows for steps to be taken to encourage under-represented groups, such as ethnic minority groups or a particular gender, to apply for jobs or training and looks at readdressing a balance or actively encouraging more balanced representation in the workforce. The Equality Act 2010 allows employers to choose to take positive action to appoint a person from an under-represented group, provided candidates are equally suitable, if they want to. However, the most suitable person must still get the job and the merit principle still applies. Such positive action will be optional and there will be no quotas. Positive discrimination (employing someone because of a characteristic regardless of merit) will remain illegal.
- 10.2 Genuine Occupational Requirements (GOR): Allows employers to favour applications from a particular ethnic group or gender where the particular job requires consideration of privacy, decency, or where being of a particular minority group is a genuine occupational requirement – for example, advertising for a female employee to work in a women’s refuge.

11. Dealing with Discrimination

- 11.1 Acts of unlawful discrimination by JTL staff shall be treated as disciplinary offences;
- 11.2 All staff and learners will be advised of grievance procedures and their rights under the law on commencement of employment or training.

12. Dealing with Harassment and Bullying

- 12.1 Racial and sexual harassment, as well as harassment concerning religious belief, disability or sexual orientation, can make the working place of the employees and learners intolerable and their performance can suffer as a result. Any such actions, which are unwanted and adversely affect working relationships, are disciplinary offences within JTL.
- 12.2 JTL staff, sub-contractors and employers have a responsibility for recognising harassment when it occurs and they should make every effort to ensure that the harassment ceases.
- 12.3 Incidents in the workplace should be initially reported to the person's Line Manager/work supervisor. If this is not practicable or satisfactory, the incident should be reported to a higher management level, or somebody who can act in a supportive/advisory role.

13. Dealing with an Internal Equality and Diversity Issue

- 13.1 If a member of JTL staff is being treated unfairly because of a protected characteristic, or is made to feel uncomfortable by somebody's behaviour, these are potential equality issues. There are various options available to a member of staff in order to deal with an issue (see Figure 1 on page 9).
- 13.2 **Assertively challenge the behaviour:** This is an option available to those who feel confident enough to confront the other person, depending on the type of issue that has arisen. This would involve telling the offender that:
 - they are not happy with the behaviour being received;
 - how it makes them feel and that they would like it to stop;
 - they are serious and will take it further if they need to;

This will give the person whose behaviour is offensive an opportunity to amend their behaviour.

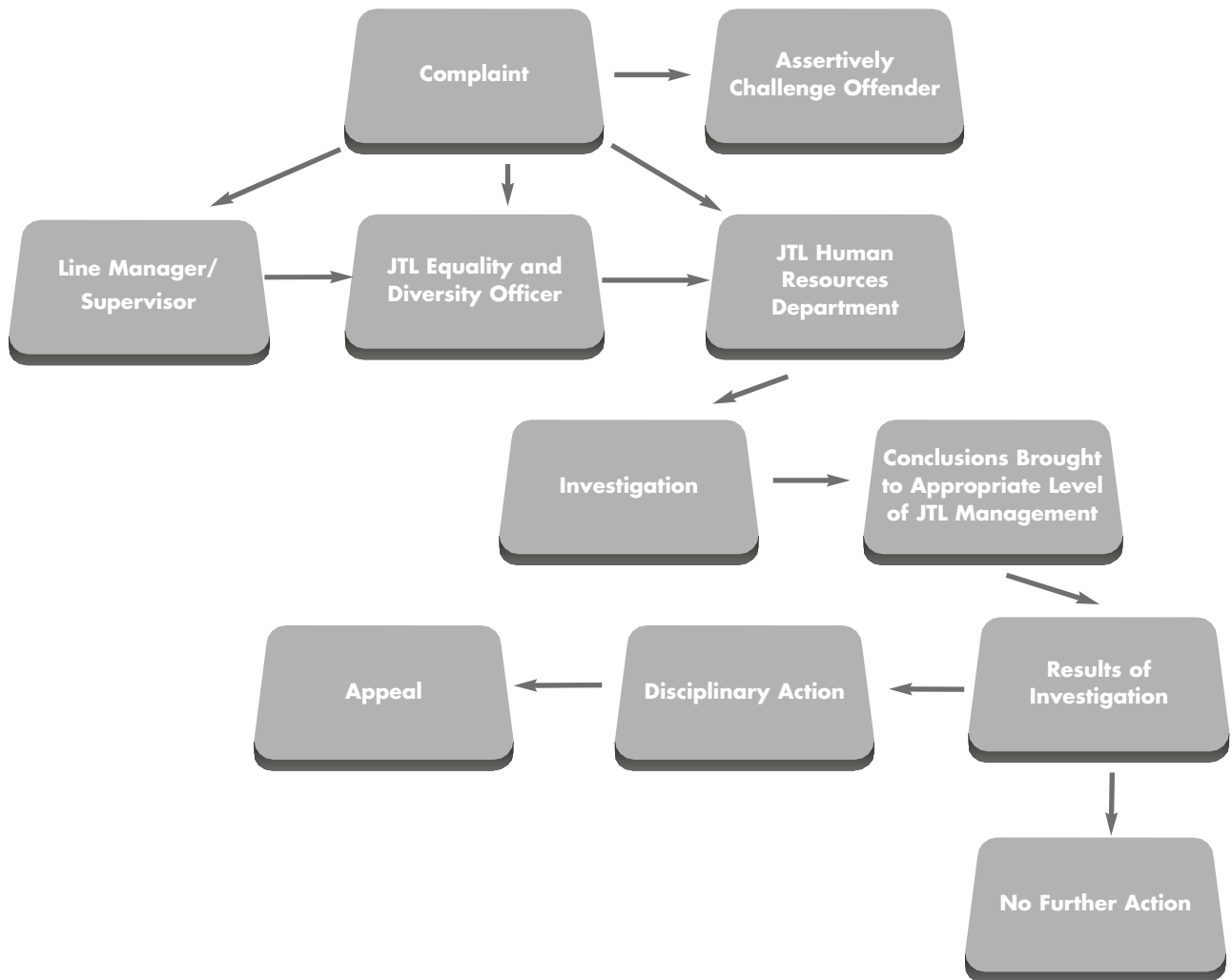
The matter should then be mentioned informally to their Line Manager, a note should be made of the action that has been taken by the individual concerned, and the situation monitored by the Line Manager. If it is a serious breach of JTL's Equality and Diversity Policy, the Line Manager will be duty-bound to take further action.

- 13.3. **Tell the Line Manager/supervisor:** If the member of staff does not feel confident enough to challenge the behaviour, he/she can bring the matter to the attention of their Line Manager or supervisor and ask them to deal with the behaviour. Depending on the nature of the issue, he/she will investigate the situation and take appropriate action, initially at a local level. The JTL Equality and Diversity Officer will be informed of the issue and will offer to assist in, or carry out, the investigation leading to the resolution of the issue.

Dealing with potential radicalisation

If a member of JTL is at risk of being radicalised or suspects an individual of becoming radicalised, they will need to report this to the E&D Officer as soon as possible in order to make a referral to the Channel Programme.

Figure 1 Internal Equality and Diversity Complaints Process



- 13.4 **Talk to JTL Equality and Diversity Officer:** If there is an equality issue, this should be reported, either through the line-management structure, or directly to the Equality and Diversity Officer or Human Resources Department. Depending on the nature of the issue, a formal investigation will be carried out.
- 13.5 If the investigation concludes that there has been a breach of JTL's Equality and Diversity Policy, this will become a disciplinary matter to be taken further by the Human Resources Department and the appropriate level of management.
- 13.6 If the issue in question is not of an equality nature, the JTL grievance procedure should be followed (as detailed in the JTL Staff Handbook).

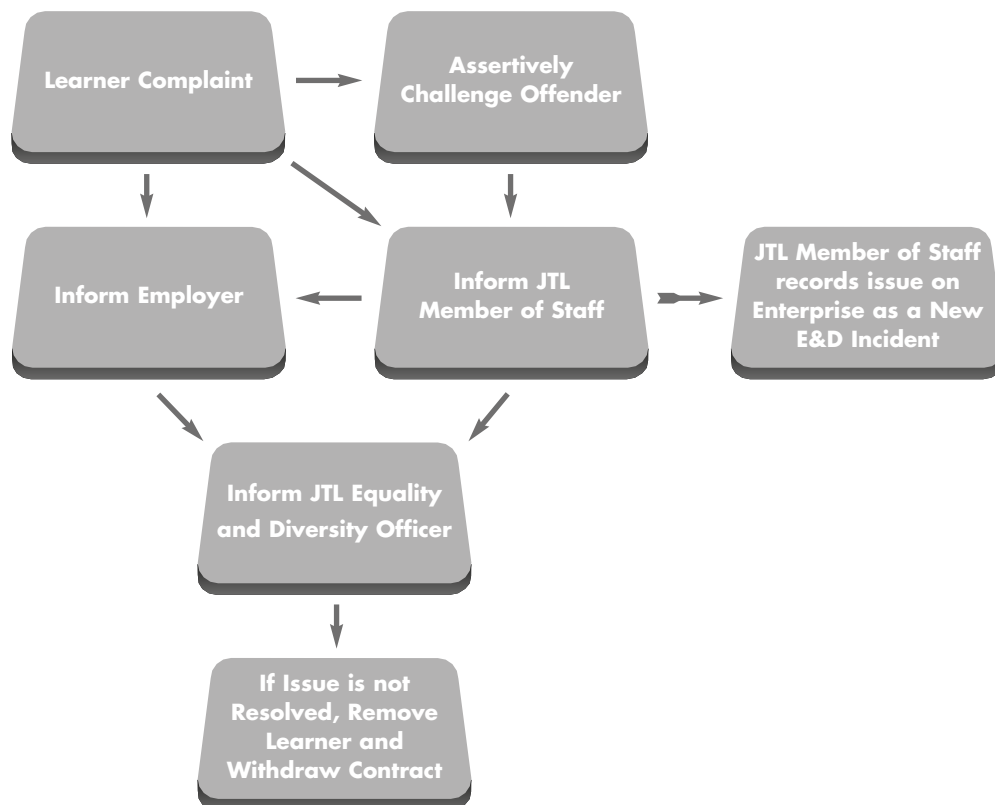
14. Options Available to a Learner with an Equality and Diversity Issue

- 14.1 A learner has various options available to him/her if he/she has experienced unfair treatment either at work, at college, or by a member of JTL staff (see Figures 2-4 on pages 11-13). When following any of these options, the JTL Equality and Diversity Officer shall be made aware of the issues that have arisen, will keep a record of the situation and may be involved in investigating the issue.

Unfair Treatment at Work (see Figure 2)

- 14.2 In the first instance, if a person is treated unfairly, bullied, harassed or discriminated against on the grounds of race, sexual orientation, sex or disability, he/she can, if they feel confident enough, manage the situation personally by assertively telling the person treating them unfairly that the behaviour in question is not acceptable and should stop. The learner should inform his/her JTL member of staff of what has taken place as soon as possible, who will monitor the situation and inform the employer and the Equality and Diversity Officer of what has happened, giving the employer opportunity to ensure that such behaviour does not continue.
- 14.3 If the learner is not comfortable with assertively challenging offensive behaviour, he/she should inform their supervisor or employer of what has happened. Steps should then be taken by the employer to ensure that the offensive behaviour does not continue. As soon as possible, the learner should inform the JTL member of staff of what has taken place. The JTL member of staff will monitor the situation and support or advise the company in finding a resolution to the situation. A large company may have its own equal opportunities representative who should follow the company policy in dealing with such issues. The JTL member of staff will still monitor the situation and offer support during this investigation.
- 14.4 As soon as an issue is brought to the attention of a JTL member of staff, he/she will inform the JTL Equality and Diversity Officer.
- 14.5 If this situation is not effectively resolved with the intervention of the JTL member of staff, supported by their Line Manager and/or the JTL Equality and Diversity Officer, and the employer is not taking action, the option at this stage may be to find another placement for the learner and withdraw the JTL contract from the employer.
- 14.6 All employers and JTL-managed learners are bound by contract and legislation to take action to prevent and stop any inappropriate behaviour in the working environment and abide by JTL's Equality and Diversity Policy.

Figure 2 Complaints Process for Learners who Experience Unfair Treatment at Work

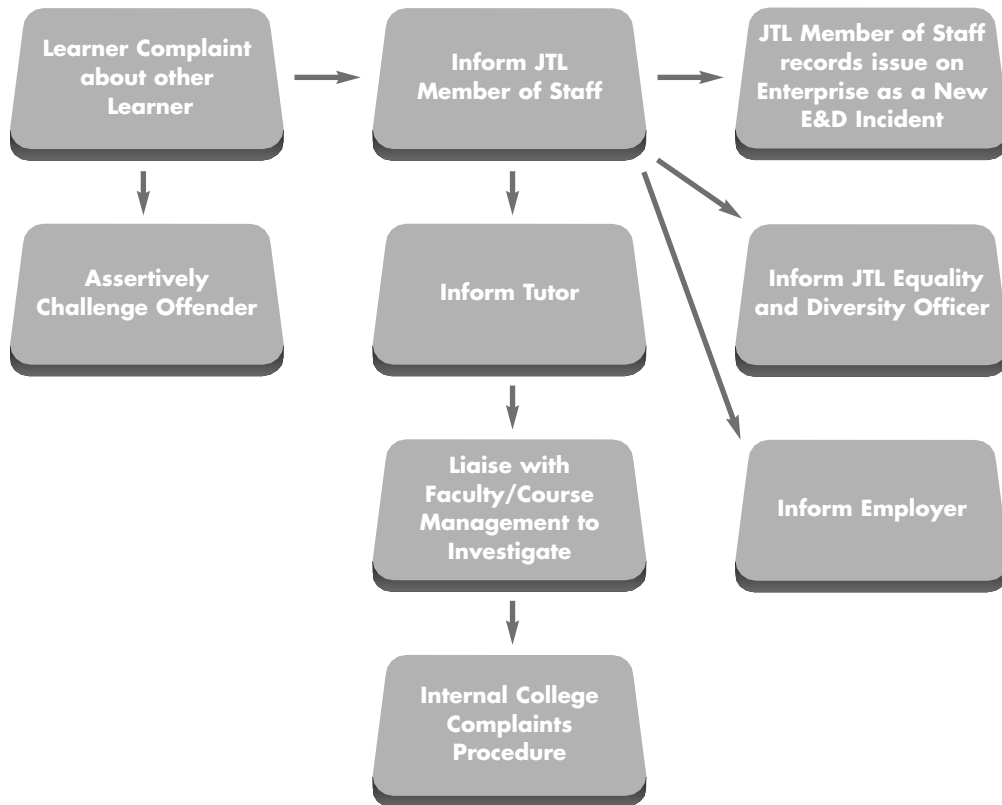


Unfair Treatment at College (see figures 3a and b)

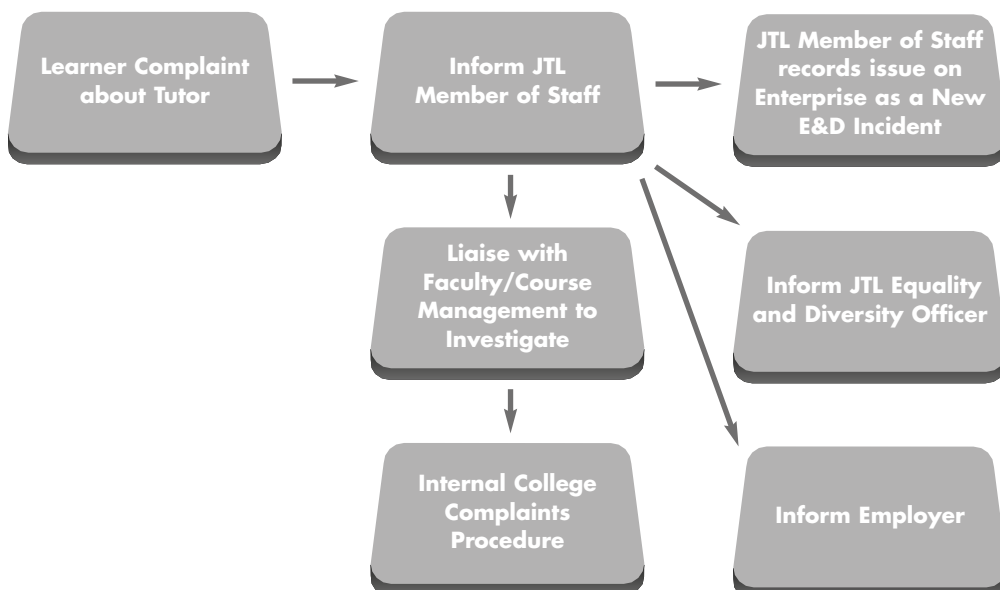
- 14.7 If a learner is experiencing unfair treatment at college, the first option in dealing with the situation could be to assertively challenge the behaviour. Not everyone would be comfortable with this approach, particularly if it is the lecturer who is causing discomfort. As soon as possible, the learner should inform a member of JTL staff of the situation that has developed, who will inform the employer and JTL's Equality and Diversity Officer.
- 14.8 If the unfair treatment is coming from fellow learners at college, this may form a breach of the college's own policy on equal opportunities or conduct on their premises. The learner should, at this stage, report the incident to their tutor who should then try to resolve the situation at a local level, or follow the college's complaints process. (See Figure 3a on page 12).
- 14.9 If the issue is with a tutor, the JTL staff member should be informed. He/she will liaise with the faculty/course management to investigate and deal with the situation, or support the learner in going through the internal college's complaints procedure (see Figure 3b on page 12).

Figure 3 Complaints Process for Learners who Experience Unfair Treatment at College

a) Learner Complaint About Other Learner



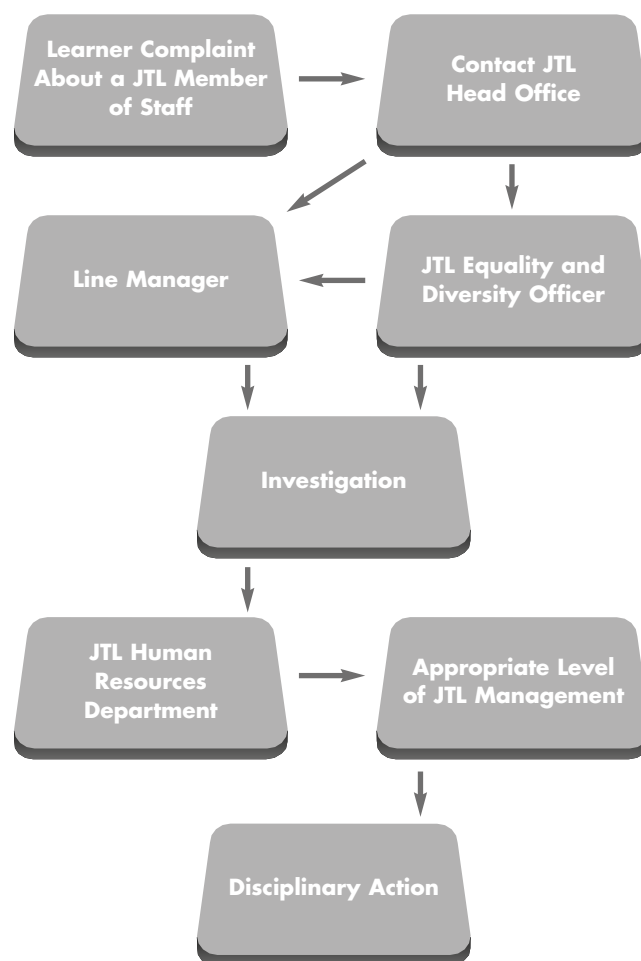
b) Learner Complaint About Tutor



Unfair Treatment from a JTL Member of Staff (see Figure 4)

- 14.10 If a learner feels that they have been treated unfairly by a JTL member of staff, through bullying, harassment or discrimination, contact can be made with JTL Head Office who will inform the Line Manager and the JTL Equality and Diversity Officer of the issues. The Line Manager or the JTL Equality and Diversity Officer will then investigate the situation and try to find some resolution to the situation. If it is found that there was a breach of the JTL Equality and Diversity Policy, disciplinary action will be taken. This process will involve JTL's Human Resources Department and the appropriate level of management.

Figure 4 Complaints Process for a Learner who Experiences Unfair Treatment from a JTL Member of Staff



15. Positive Action

- 15.1 Certain positive measures are allowed by law to encourage an increase in representation where there has been under-representation of minority groups (e.g. women, minority ethnic groups and people with disabilities). JTL provides access to training, mentoring and selective advertising for the members of a particular minority group. JTL will also develop and lead on projects aimed specifically at under-represented groups to encourage application to either apprenticeships or employment. Discrimination at the point of selection for jobs or promotion is unlawful.
- 15.2 Where possible, consideration shall be given to applying alternative working arrangements, for example to assist in certain domestic circumstances, or for cultural or religious needs.

16. Trade Union Membership

- 16.1 JTL staff and learners may join a relevant union if they wish and are eligible to do so under the union's rules. The recognised trade union in the craft sector of the building services engineering sector is Unite the Union.
- 16.2 The role of the trade unions shall be explained to learners during induction courses administered by JTL. Union members may seek help and advice from their union on, for example, disciplinary matters, grievances and discrimination.

17. Recording, Monitoring and Reviewing

- 17.1 JTL shall record, monitor and review the implementation of its Equality and Diversity Policy in order to ensure its effectiveness. Results of this programme shall form the basis of positive action.
- 17.2 JTL shall monitor and record relevant statistics in the following areas:
- applications for training and employment;
 - successful JTL assessment candidates and those with secured work placements;
 - early leavers;
 - learners with successful outcomes.
- These statistics will be regularly evaluated to see if there are any anomalies or trends and to ensure that the policy is being put into practice.
- 17.3 JTL shall keep reasons given by staff for leaving. JTL shall also keep records of the reasons given by learners for leaving training without achieving their individual training goal. All information recorded will be used to help JTL monitor and evaluate the provision of equal opportunities within its employment and training provisions with a view to reducing staff turnover and learner dropout rates.
- 17.4 All personal information collected for the purpose of equal opportunities monitoring will be treated as confidential and not misused, in accordance with the Data Protection Act (1998).

18. Responsibilities and Liabilities

- 18.1 All staff, employers and learners shall be made aware of the JTL Equality and Diversity Policy and procedures on induction and subsequent updates.

- 18.2 Although overall responsibility for implementing JTL's Equality and Diversity Policy rests with JTL's Directors, it is the responsibility of all staff, employers and learners to ensure that they have read the Policy, understood it and comply with it.
- 18.3 All JTL sub-contractors shall be made aware of the Equality and Diversity Policy and their duty to ensure that it is upheld. Failure by sub-contractors to uphold the policy may result in the termination of their contract.
- 18.4 If an employee or a learner, in the course of their employment, discriminates unlawfully against any individual because of their protected characteristic, they can be held personally liable where JTL can show that they have taken all practical steps to prevent discrimination from taking place.
- 18.5 **Vicarious liability:** JTL, as an employer, is liable for any discriminatory act carried out, with or without its knowledge or approval, by an employee in the course of their work – unless JTL can show that all practicable steps were taken to prevent the employee discriminating, in which case the employee could be held personally liable for their actions.
- 18.6 **Communications:** the sending of defamatory, abusive, sexist or racist messages and materials, and the accessing or downloading of pornographic or other offensive material is prohibited. The company cannot prevent such material being received from external sources and it is therefore the responsibility of the individual to avoid accessing it, and delete it immediately if received accidentally. The company reserves the right to determine the suitability of information for publication. The use of inappropriate humour, explicit language or offensive images is further prohibited (JTL employees, see the JTL Staff Handbook: Annex 03 – Communications Policy for further reference).
- 18.7 JTL conducts its business with the highest standards of integrity and honesty at all times, and expects all employees to maintain these same standards in everything they do. Employees are therefore encouraged to report any wrongdoing by JTL, or its employees, that falls short of these business principles.
- 18.8 The Public Interest Disclosure Act (1998) protects employees who report wrongdoing within the workplace and it is the aim of this policy to ensure that, as far as possible, JTL's employees are able to tell the company about any wrongdoing at work which they believe has occurred, or is likely to occur.
- 18.9 JTL recognises that employees may not always feel comfortable about discussing their concerns initially, especially if they believe that JTL itself is responsible for the wrongdoing. The aim of this Whistleblowing (Public Interest Disclosure) Policy is to ensure that employees are confident that they can raise any matter with JTL that concerns them in the knowledge that it will be taken seriously, treated as confidential, and no action will be taken against them.
- 18.10 JTL employees are encouraged to use the Whistleblowing (Public Interest Disclosure) Policy in the JTL Staff Handbook if they have any concerns at all about wrongdoing at work, including any criminal offence, a failure to comply with legal or contractual obligations, a miscarriage of justice, a health and safety danger, an environment risk, or a concealment of any of these.

19. Disability Statement

19. When considering employment opportunities within JTL, best endeavours shall be used to ensure that every possible opportunity is given to anyone with the appropriate skills to apply to JTL and carry out the roles required of them, making any reasonable adjustments where necessary to enable them to do that job.
- 19.2 There are health and safety regulations that apply in the building services engineering sector with which JTL must comply when considering applicants for field staff positions and apprenticeships. These regulations will take precedence over any disability issues.
- 19.3 Subject to paragraph 19.2 above, JTL offers all reasonable and practical support to all staff and applicants for positions within JTL, who have a disability (Protected Characteristic) as defined under the Equality Act 2010 (formerly the Disability Discrimination Act 1995) to enable them to carry out any tasks required as part of their job.
- 19.4 JTL-managed learners who have a disability as defined in the Equality Act 2010 can receive reasonable and practical support via JTL and its sub-contractors (i.e. colleges) throughout their apprenticeship.
- 19.5 Discrimination on the grounds of disability could be in breach of the Equality Act 2010 and will not be accepted by JTL, and it is likely to be treated as a disciplinary offence.

20. Contacts

- 20.1 The first line of contact for internal staff should be the immediate Line Manager. If this is inappropriate, or the query cannot be resolved, the local equality and diversity representative may be able to help. Alternatively the Equality and Diversity Officer at JTL Head Office should be contacted.
- 20.2 The first line of contact for learners, employers, colleges and other sub-contractors is the assigned JTL member of staff. If the query cannot be resolved, the Equality and Diversity Officer at JTL's Head Office should be contacted on 01689 884100.

JTL Head Office:

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120-122 High Street
Orpington
Kent
BR6 0JS

Call: 01689 884100 Fax: 01689 891658

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