



EQUALITY AND DIVERSITY POLICY



Version Number	Date	Purpose of Change	Classification	Sign Off
V4.1	13/11/2025	Merging of EPA, NOPS and Qualifications Policies and new content and formatting	Public	Kerry Ore

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1. POLICY STATEMENT

1.1 Smart Awards is committed to promoting an inclusive, fair and respectful environment across all aspects of its work. The organisation recognises that equality, diversity and inclusion (EDI) are fundamental not only to legal compliance but also to delivering high-quality qualifications, apprenticeship assessments, End-Point Assessments (EPA) and NOPS activities. Every individual interacting with Smart Awards should be able to do so free from discrimination, disadvantage or unjust treatment.

1.2 Smart Awards values the contributions of all individuals and actively seeks to create environments where differences are recognised, respected and celebrated. This policy reflects Smart Awards' commitment to ensuring that:

- Opportunities to access learning, assessment, EPA and NOPS processes are fair, inclusive and free from discrimination.
- Everyone is treated with dignity and respect, regardless of background or personal characteristics.
- Equality of opportunity is embedded into organisational culture and day-to-day practice.
- All staff, partners, Centres, Employers and Training Providers continue to develop an understanding of EDI and uphold the principles contained within this policy.
- Assessment, validation and certification processes promote fairness and consistency for all individuals.

1.3 Smart Awards fully supports and complies with the Equality Act 2010, the Public Sector Equality Duty, Ofqual's General Conditions of Recognition, Ofqual EPA Qualification Level Conditions and Qualifications Scotland Accreditation Principles.

2. PURPOSE AND SCOPE

2.1 The purpose of this policy is to ensure that Smart Awards provides fair, inclusive, accessible services and assessment opportunities across all the areas for which it is responsible. This includes qualifications, apprenticeship assessments, the delivery of EPA, and NOPS processes. The policy establishes expectations for behaviour, procedural fairness, and organisational responsibilities in relation to equality, diversity and inclusion.

2.2 This policy provides a framework for:

- Eliminating discrimination, harassment and victimisation.
- Promoting equality of opportunity across all services.
- Ensuring assessments, EPA activities and NOPS processes are accessible and inclusive.
- Upholding fairness in all quality assurance, decision-making and certification processes.
- Supporting Centres, Employers and Training Providers to embed EDI in their own delivery.
- Ensuring reasonable adjustments are applied fairly and consistently without compromising assessment integrity.
- Supporting staff, assessors, IEPAs and contractors to understand and fulfil their own EDI responsibilities.
- Ensuring individuals know how to raise concerns relating to discrimination or unfair treatment.

2.3 This policy applies to:

- Learners and apprentices

- Centres, Employers and Training Providers
- Assessors, Internal Quality Assurers (IQAs), External Quality Assurers (EQAs)
- Independent End-Point Assessors (IEPAs)
- NOPS users and organisations
- Smart Awards staff, Board and contractors
- Any third-party individuals or organisations acting on behalf of Smart Awards

2.4 It covers all stages of engagement, including registration, assessment, EPA delivery, appeals, monitoring, reasonable adjustments and certification.

3. DEFINITIONS

To support consistent understanding, this policy uses the following definitions:

3.1 Equality

Equality means ensuring that all individuals have equal access to opportunities, assessments, services and support. It does not mean treating everyone the same, but instead ensuring that barriers are identified and removed to allow everyone to participate fully.

3.2 Diversity

Diversity recognises and values individual differences including, but not limited to, background, culture, protected characteristics, work style, learning needs and lived experience. Smart Awards values diversity because it strengthens perspectives, improves decision-making and increases the relevance of services for users.

3.3 Inclusion

Inclusion means creating an environment in which individuals feel welcomed, respected, supported and able to fully participate. An inclusive approach requires active effort to identify and remove structural, cultural or procedural barriers.

3.4 Protected Characteristics (Equality Act 2010)

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

These are legally protected characteristics and must not be used as a basis for discrimination.

3.5 Types of Discrimination

Smart Awards recognises the following forms:

- **Direct discrimination** – treating someone less favourably because of a protected characteristic.
- **Indirect discrimination** – applying rules or practices that disadvantage certain groups.

- **Harassment** – unwanted behaviour relating to a protected characteristic that creates a hostile or degrading environment.
- **Victimisation** – treating someone unfairly for raising or supporting a complaint or concern.
- **Associative discrimination** – discrimination based on someone’s association with a person with a protected characteristic.
- **Perceptive discrimination** – discrimination based on a perception that someone holds a protected characteristic.

3.6 Reasonable Adjustments

Reasonable adjustments are changes that remove or reduce disadvantage for disabled individuals without compromising the integrity or validity of assessment outcomes. Reasonable adjustments must:

- Be appropriate
- Maintain assessment standards
- Be applied consistently
- Meet regulatory expectations

4. PRINCIPLES

Smart Awards’ approach to equality, diversity and inclusion is built on a set of principles that guide the design, delivery, assessment and assurance of all Qualifications, Apprenticeship Assessments, End-Point Assessments (EPA) and NOPS-related activity. These principles shape organisational expectations for behaviour, decision-making, accessibility and fairness across all interactions.

These principles do not simply describe compliance; they define the culture Smart Awards aspires to create and sustain.

4.1 Fairness and Equity

Smart Awards is committed to ensuring that every individual is treated fairly, with respect, and without discrimination. This principle underpins all aspects of qualification and assessment delivery and ensures individuals:

- Have equal access to opportunities and resources.
- Receive treatment based solely on objective evidence and established criteria.
- Are not disadvantaged due to a protected characteristic or personal circumstance.

Fairness means that assessment decisions remain consistent across assessors, IEPAs, centres and settings, and that every individual’s experience is equitable.

4.2 Respect, Dignity and Inclusive Practice

Smart Awards expects all staff, Centres, Employers, Training Providers, Assessors, IEPAs and NOPS organisations to promote respectful conduct. Every person should feel valued and able to participate without fear of prejudice, exclusion or hostility.

Inclusive practice requires individuals to:

- Communicate respectfully
- Challenge inappropriate behaviour or comments

- Recognise the experiences of others
- Understand that respect is central to a safe and supportive learning and assessment environment

This commitment extends to remote, online and written interactions as well as in-person activities.

4.3 Eliminating Discrimination, Harassment and Victimisation

Smart Awards actively works to eliminate all forms of discrimination, harassment and victimisation in line with statutory obligations. This includes behaviours that are:

- Intentional or unintentional
- Overt or subtle
- Carried out by individuals or systems

No individual should be disadvantaged or experience unfavourable treatment due to personal characteristics.

Smart Awards investigates all allegations of discriminatory behaviour in accordance with relevant policies, including the Complaints Policy, the Malpractice and Maladministration Policy and the Whistleblowing Policy.

4.4 Accessibility and Removing Barriers

Smart Awards aims to ensure that assessments, NOPS processes and related services are fully accessible. This includes:

- Removing unnecessary barriers
- Ensuring systems, assessments and documentation are accessible
- Ensuring venues and digital platforms meet accessibility requirements
- Providing reasonable adjustments in line with regulatory expectations

The organisation will, where possible, anticipate accessibility needs rather than respond only when raised.

4.5 Promoting Equality of Opportunity

Equality of opportunity means ensuring that each individual can participate fully, regardless of background or personal circumstance. Smart Awards and its partners must identify and remove barriers that limit participation, including:

- Language, literacy or communication needs
- Disability-related barriers
- Lack of digital access
- Limited familiarity with assessment or EPA processes
- Procedural requirements that inadvertently disadvantage certain groups

By promoting equality of opportunity, Smart Awards upholds its commitment to inclusion and accessibility.

4.6 Maintaining Assessment Integrity While Supporting Inclusion

While promoting equality and inclusion, Smart Awards must maintain the integrity and validity of assessment decisions. Achieving fairness does not mean lowering standards; it means ensuring every person has an equal opportunity to demonstrate competence.

Smart Awards ensures:

- Only adjustments that preserve validity are approved
- EPA independence is never compromised
- Evidence required for Qualifications and Apprenticeships continues to reflect genuine achievement
- Adjustments do not unfairly advantage any individual

4.7 Professionalism and Accountability

Everyone involved in Smart Awards activities shares responsibility for upholding this policy. Individuals must:

- Reflect on their own behaviour and conduct
- Act in accordance with professional and ethical standards
- Recognise and challenge discriminatory or unfair practices
- Report concerns where equality may have been compromised

Smart Awards holds individuals, centres and organisations accountable for maintaining these expectations.

4.8 Data-Informed Equality Practice

Smart Awards uses equality data, feedback and monitoring to identify:

- Trends
- Disproportionate outcomes
- Barriers to access or achievement
- Opportunities for improvement

This information informs decision-making and continuous improvement across Qualifications, EPA, Apprenticeships and NOPS.

4.9 Compliance with the Equality Act and Regulatory Frameworks

Smart Awards' EDI principles align with:

- **The Equality Act 2010**
- **Public Sector Equality Duty (where applicable)**
- **Ofqual General Conditions of Recognition**
- **Ofqual EPA Qualification Level Conditions**
- **SQA Accreditation Principles**
- Requirements within **Assessment Plans**
- Expectations of **ESFA, IfATE** and industry bodies

This ensures EDI is fully embedded across all assessment and operational processes.

4.10 Continuous Improvement

EDI is not a static set of requirements. Smart Awards commits to:

- Regular review of policies and procedures
- Continuous staff and contractor development
- Reflective practice
- Using complaints, feedback and equality data to inform improvements
- Updating practices in line with best practice, law and regulation

This ensures Smart Awards remains a fair, inclusive and responsive organisation.

SECTION 5 – RESPONSIBILITIES

Embedding equality, diversity and inclusion across Smart Awards' operations requires clarity about the responsibilities held by every part of the organisation and those connected to it. This section sets out the responsibilities of individuals and organisations involved in Qualifications, Apprenticeship Assessments, EPA and NOPS activity. Responsibilities apply whether activities are carried out in person, remotely, or through digital systems.

5.1 Smart Awards Board

The Board holds ultimate accountability for ensuring that Smart Awards operates as an inclusive organisation and complies with all statutory and regulatory requirements relating to equality and diversity. The Board ensures that:

- EDI considerations are reflected in strategic decision-making.
- Adequate resources are allocated to support the effective implementation of this policy.
- Equality, diversity and inclusion risks are recognised and monitored.
- Policies, processes and practices remain compliant with regulatory frameworks.
- Data, feedback and reports identify systematic inequalities early and prompt appropriate action.

The Board's commitment establishes the tone for the entire organisation and reinforces expectations that EDI is central to quality and integrity.

5.2 Chief Executive Officer (CEO)

The CEO/MD is responsible for ensuring this policy is fully implemented and operationally embedded. Key responsibilities include:

- Providing leadership that champions equality, diversity and inclusion.
- Ensuring policies, practices and decisions align with EDI principles.
- Overseeing risks associated with discrimination, accessibility barriers or unfair treatment.
- Ensuring senior leaders understand their responsibilities and act accordingly.
- Ensuring that reports of discrimination or inequality are investigated promptly and effectively.
- Ensuring that corrective action, training or changes to practice are put in place where necessary.

The CEO/MD ensures that Smart Awards takes a proactive and transparent approach to EDI.

5.3 Responsible Officer

This role has a central function in ensuring Smart Awards meets regulatory obligations and supports inclusive practice. Responsibilities include:

- Leading on compliance with the Equality Act and applicable regulatory conditions.
- Ensuring guidance and processes relating to EDI are up to date and clearly communicated.
- Overseeing reasonable adjustment processes and ensuring decisions are fair and consistent.
- Monitoring trends in equality data, complaints, adjustments and outcomes.
- Supporting staff, contractors and partners in understanding and applying EDI principles.
- Ensuring findings from equality-related complaints or incidents result in improvements.
- Reporting risks or concerns to senior leadership or the Board where required.

The Quality & Compliance Manager plays a key role in driving continuous improvement.

5.4 Smart Awards Staff

All Smart Awards employees, irrespective of role, are required to:

- Treat individuals fairly, respectfully and without discrimination.
- Understand and follow the expectations of this policy.
- Reflect on their own potential biases and take steps to mitigate them.
- Respond sensitively and appropriately to equality concerns raised by individuals.
- Support the application of fair and inclusive processes across assessment and administration.
- Report concerns relating to discrimination, unfair treatment or accessibility barriers.

Staff have a role in modelling the behaviour expected from partners, assessors and centres.

5.5 Assessors, Internal Quality Assurers (IQAs), External Quality Assurers (EQAs), and Independent End-Point Assessors (IEPAs)

Individuals responsible for making or quality assuring assessment decisions must demonstrate the highest level of impartiality and inclusivity. Their responsibilities include:

- Applying assessment criteria fairly, consistently and without bias.
- Undertaking training on equality, diversity, inclusion and unconscious bias.
- Using accessible communication when interacting with learners or apprentices.
- Recognising where individuals may require adjustments and signposting processes appropriately.
- Ensuring adjustments do not compromise validity, reliability or EPA independence.
- Reporting concerns about discriminatory behaviour, barriers or unfair treatment.

For IEPAs, there is an additional duty to maintain independence from training and internal assessment, even when adjustments are present.

5.6 Centres, Employers and Training Providers

Smart Awards requires Centres, Employers and Training Providers to uphold the principles of equality and inclusion in all aspects of their provision. Responsibilities include:

- Ensuring learners and apprentices are supported fairly from registration to completion.
- Maintaining an inclusive environment for learning and assessment.
- Ensuring their staff understand legal duties under the Equality Act.
- Identifying accessibility or support needs at the earliest possible stage.
- Submitting reasonable adjustment requests with appropriate evidence.
- Ensuring internal assessment practices are free from bias or discrimination.
- Ensuring communication is accessible, respectful and inclusive.
- Providing fair access to facilities, resources and information.
- Challenging discriminatory behaviours or systems.

Providers must work collaboratively with Smart Awards to ensure equality is upheld throughout all assessment arrangements.

5.7 Learners, Apprentices, and NOPS Users

All individuals engaging with Smart Awards services are expected to:

- Treat others with respect and dignity.
- Follow all procedures relating to equality, behaviour and assessment.
- Provide accurate and truthful information when requesting reasonable adjustments.
- Communicate openly about support needs or barriers where comfortable.
- Comply with Centre, Provider or employer expectations for inclusive participation.
- Inform Smart Awards or the provider if they experience or witness discrimination.

Learners and apprentices should never feel they are disadvantaged for raising concerns, and Smart Awards ensures protection through its Complaints and Whistleblowing Policies.

5.8 Contractors, Third Parties, and NOPS Organisations

Any organisation or individual working on behalf of Smart Awards must:

- Uphold all requirements of this policy.
- Demonstrate commitment to fair and inclusive practices.
- Provide accessible communication and services.
- Ensure systems and environments do not disadvantage any individuals.
- Report incidents of discrimination, harassment or unfair treatment immediately.
- Ensure digital platforms (including NOPS systems) support accessibility and fairness.

Failure to uphold these responsibilities may result in contract termination or removal of access.

6. ACCESSIBILITY AND REASONABLE ADJUSTMENTS

6.1 Smart Awards is committed to ensuring that all individuals can access assessments, EPA activities, qualifications and NOPS processes without unnecessary barriers. Accessibility is integral to fairness and inclusion, and Smart Awards works proactively with Centres, Providers, Employers and individuals to ensure appropriate arrangements are identified and applied.

6.2 Reasonable adjustments enable disabled individuals or those with long-term conditions to demonstrate their competence without being unfairly disadvantaged. Adjustments must:

- Address a disadvantage arising from a disability or condition
- Not compromise the competence standard
- Not threaten the independence of the EPA
- Not give an unfair advantage
- Be applied consistently and transparently
- Comply with regulatory and Assessment Plan requirements

6.3 Smart Awards encourages early identification of needs so that adjustments can be considered and implemented in a timely and effective manner. Individuals and Centres should raise adjustment requirements as early as possible during qualification or apprenticeship delivery.

6.4 Examples of reasonable adjustments may include:

- Extra time
- Modified assessment materials or formats
- Assistive technology
- Rest breaks
- Accessible venues, seating or digital platforms
- British Sign Language interpreting
- Allowing verbal responses or transcription where appropriate

6.5 EPA-specific adjustments must comply with the Assessment Plan and must not alter the nature of the assessment decision. Smart Awards carefully reviews all requests to ensure compliance.

6.6 Requests for adjustments must be submitted with sufficient evidence and detail to allow a fair and informed decision. All decisions are communicated clearly, with reasons provided where adjustments are not approved.

7. PREVENTING DISCRIMINATION, BIAS AND UNFAIR TREATMENT

Smart Awards is committed to eliminating discrimination and ensuring that every stage of qualification delivery, assessment, EPA and NOPS activity is free from bias and unfairness. Preventing discrimination requires continuous awareness, scrutiny and improvement.

Smart Awards works to identify and prevent discrimination in:

- Assessment decisions
- Centre delivery and internal assessment

- EPA activities and IEPA conduct
- NOPS verification and card processes
- Registration, certification and administrative functions
- Communication and service delivery
- Access to support, adjustments or resources

7.1 Preventing Bias in Assessment and EPA

Assessors and IEPAs must ensure:

- Decisions are based solely on evidence
- No assumptions are made based on personal characteristics
- Assessments follow criteria consistently
- Questions are asked in an unbiased manner
- Performance is appraised objectively

Smart Awards provides regular training on:

- Unconscious bias
- Respectful communication
- Cultural awareness
- Promoting inclusive assessment practice

7.2 Preventing Discrimination in NOPS Processes

NOPS organisations and users must ensure:

- Photo and identity checks are applied consistently
- Verification procedures do not disadvantage certain groups
- Card validity decisions are objective and evidence-based
- Digital systems are inclusive and accessible

7.3 Preventing Structural or Systemic Barriers

Smart Awards proactively reviews:

- Assessment arrangements
- Policy wording
- Language used in documentation
- System accessibility
- Centre approval processes to ensure they do not inadvertently disadvantage any group.

Discriminatory behaviour by any partner, Centre, Provider, Employer or user will be investigated and dealt with under the Complaints, Malpractice or Whistleblowing procedures.

8. EQUALITY IN ASSESSMENT, EPA, APPRENTICESHIPS AND NOPS

Equality must be embedded across every part of Smart Awards' assessment and certification processes. This includes:

8.1 Equality in Qualifications and Apprenticeship Assessments

Smart Awards ensures that:

- Assessment methods are inclusive and accessible
- Qualification specifications support fairness
- Centre and provider delivery meets equality expectations
- IQA and EQA processes monitor fairness
- Learners are supported to engage without disadvantage

8.2 Equality in EPA

EPA must be fair, consistent, independent and accessible. Smart Awards ensures:

- EPA criteria are applied consistently
- Reasonable adjustments comply with Assessment Plans
- IEPAs demonstrate impartiality and independence
- EPA sites, platforms or environments are accessible

8.3 Equality in NOPS Processes

For NOPS users:

- Applications and card processes must be accessible
- Verification processes must be fair and consistent
- No legitimate user must be excluded or disadvantaged
- Data and systems must be accessible and secure

8.4 Equality in Digital and Remote Delivery

Smart Awards ensures:

- Remote EPA is accessible
- Digital platforms are usable by individuals with varying needs
- Communication meets accessibility standards
- Guidance is clear and inclusive

Smart Awards continually reviews digital processes to ensure inclusivity for all users, including those with limited digital access or digital literacy.

9. REPORTING CONCERNS

9.1 Individuals have the right to raise concerns if they believe:

- They have experienced discrimination
- Someone else has experienced discrimination
- A process or decision is unfair
- An adjustment decision is inconsistent
- A Centre, Provider, Employer or assessor is acting in a discriminatory manner
- A NOPS decision or verification process is unfair

9.2 Concerns may be raised via:

- Email
- SAMS system

- Centre or Provider staff
- Smart Awards staff
- Appeals process (for assessment decisions)
- Complaints process (for discriminatory conduct)
- Whistleblowing (for protected disclosures)

9.3 Smart Awards investigates concerns sensitively, confidentially and in line with its Complaints, Appeals, Malpractice and Whistleblowing Policies.

9.4 Individuals who raise concerns in good faith will not be treated unfairly or disadvantaged as a result.

10. MONITORING AND REVIEW

10.1 Smart Awards monitors equality, diversity and inclusion performance across all departments. Monitoring allows Smart Awards to identify:

- Trends in complaints relating to equality
- Disparities in outcomes
- Irregularities in EPA performance
- Barriers to accessing NOPS processes
- Recurring issues within Centres or Providers
- Systemic risks and emerging areas of inequality

10.2 Monitoring activities include:

- Reviewing equality-related complaints
- Analysing adjustment requests
- Reviewing assessment outcomes across groups
- Reviewing NOPS verification data
- Conducting audits and quality assurance visits
- Reviewing policies annually
- Consulting with stakeholders
- Reviewing training materials and guidance

Outcomes of monitoring inform Smart Awards' continuous improvement activities.

10.3 This policy is reviewed annually or earlier where:

- Legislation changes
- Regulator requirements change
- Equality-related risks emerge
- Centres or users identify concerns
- Complaints or appeals highlight areas of improvement

All updates must be approved by the Smart Awards Board.

11. OFQUAL GENERAL CONDITIONS

11.1 Condition D2.1 – Accessibility of Qualifications - An awarding organisation must design assessments which permit reasonable adjustments to be made, whilst ensuring the validity of the assessment is not compromised.

11.2 Condition G4.1 – Reasonable Adjustments - An awarding organisation must have in place clear arrangements to provide reasonable adjustments for disabled learners.

11.3 Condition G6.1 – Avoiding Bias - An awarding organisation must take all reasonable steps to ensure that assessment materials do not disadvantage any group of learners.

12. OFQUAL APPRENTICESHIP CONDITIONS

12.1 EPA1.1 – Assessment Plan Compliance - Reasonable adjustments must not conflict with requirements of the Assessment Plan.

12.2 EPA3.1 – Adverse Effect Notifications - Discrimination or failure to provide lawful adjustments may be considered an Adverse Effect.

13. QUALIFICATIONS SCOTLAND ACCREDITATION PRINCIPLES

13.1 Principle 6 – Resources and Competence - The awarding body and its providers must have the necessary expertise, resources and systems to support equality of access.

13.2 Principle 10 – Integrity and Security of Assessment - The awarding body must ensure the integrity and security of assessment instruments and certification throughout their lifecycle.

13.3 Principle 13 – Quality Assurance - The awarding body and its providers must have systems and processes which ensure the effective quality assurance of accredited qualifications.