Swindon Tuition Centre

Equality, Diversity & Inclusion Policy

Version 3

Policy name	Policy Owner	Approved by	Date	Review date
Equality, Diversity & Inclusion Policy	Director of Strategy	Leadership Team	27.07.26	01.09.2027

Policy Updates

Review date	Update Summary	Reviewed by:	Next Review:
27.07.26	Policy comprehensively reviewed and updated to reflect the Equality Act 2010, current employment legislation, safeguarding guidance, inclusive practice and organisational governance. Reformatted to align with STC's governance framework and linked with associated employment and safeguarding policies.	Director of Strategy	01.09.27
10.11.26	Added procedures for identifying and supporting individual learner needs at referral, including SEND, SEMH, safeguarding considerations, reasonable adjustments and placement planning, following EOTAS quality assurance feedback.	Director of Strategy	01.09.27

Statutory Framework

This policy has been developed in accordance with the following legislation and statutory guidance:

- Equality Act 2010
- Human Rights Act 1998
- Employment Rights Act 1996
- Worker Protection (Amendment of Equality Act 2010) Act 2023
- Children Act 1989
- Children Act 2004
- Special Educational Needs and Disability (SEND) Code of Practice: 0–25 years (2015)
- Keeping Children Safe in Education (DfE, September 2026)
- Working Together to Safeguard Children (2023)
- Data Protection Act 2018
- UK General Data Protection Regulation (UK GDPR)

This policy should be read alongside Swindon Tuition Centre's wider safeguarding, people and governance policies.

Policy Consultation & Review

This policy is reviewed annually by the Leadership Team and will also be reviewed following:

- changes in legislation or statutory guidance;
- developments in equality, diversity and inclusion best practice;
- organisational learning;
- safeguarding reviews;
- significant organisational change;
- commissioner or inspection feedback.

Swindon Tuition Centre welcomes feedback from staff, learners, parents, commissioners and partner agencies to support continuous improvement and promote an inclusive organisational culture.

Purpose

Swindon Tuition Centre (STC) is committed to creating an inclusive, respectful and equitable environment where every learner, member of staff, volunteer and visitor is valued and treated with dignity.

We recognise that equality, diversity and inclusion are fundamental to delivering high-quality education, safeguarding children, supporting our workforce and achieving positive outcomes for everyone who works with or accesses our services.

The purpose of this policy is to:

- promote equality of opportunity;
- celebrate diversity;
- foster an inclusive organisational culture;
- eliminate unlawful discrimination, harassment and victimisation;
- meet our statutory responsibilities under the Equality Act 2010;
- remove barriers to participation wherever reasonably practicable;
- support fair and inclusive employment practices;
- strengthen safeguarding through equitable and inclusive practice;
- promote organisational learning and continuous improvement.

Equality, diversity and inclusion are everyone's responsibility and underpin all aspects of Swindon Tuition Centre's work.

This policy should be read alongside the Staff & Volunteers Code of Conduct, Safeguarding & Child Protection Policy, Safer Recruitment Policy, Flexible Working Policy, Staff Absence Policy, Disciplinary & Grievance Policy, Complaints Policy and Whistleblowing (Speaking Up) Policy.

Scope

This policy applies to everyone working for, learning with or accessing services provided by Swindon Tuition Centre, including:

- employees;
- agency workers;
- volunteers;
- contractors;
- consultants;
- trustees (where applicable);
- learners;
- parents and carers;
- visitors;
- applicants for employment;
- commissioners and partner organisations where appropriate.

The policy applies throughout all areas of the organisation, including:

- recruitment;

- employment;
- training and development;
- promotion;
- performance management;
- safeguarding;
- learner admissions;
- curriculum delivery;
- behaviour management;
- alternative provision;
- community tuition;
- outdoor learning;
- commissioned services.

Swindon Tuition Centre expects everyone working for or on behalf of the organisation to uphold the principles set out within this policy.

Definitions

Equality

Equality means ensuring that everyone has fair access to opportunities, support and services, recognising that some individuals may require different levels of support or reasonable adjustments to achieve equitable outcomes.

Swindon Tuition Centre is committed to removing unnecessary barriers and ensuring that decisions are made fairly, objectively and without unlawful discrimination.

Diversity

Diversity recognises, values and celebrates the differences between individuals, including their backgrounds, experiences, perspectives, identities and characteristics.

A diverse workforce and learner community strengthens creativity, innovation, decision-making and educational outcomes.

Inclusion

Inclusion means creating an environment where everyone feels welcomed, respected, valued and able to participate fully, regardless of their background or protected characteristics.

An inclusive culture actively removes barriers to participation and promotes a sense of belonging for all.

Protected Characteristics

The Equality Act 2010 identifies nine protected characteristics:

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

Swindon Tuition Centre will not tolerate unlawful discrimination relating to any protected characteristic.

Direct Discrimination

Direct discrimination occurs when an individual is treated less favourably because of a protected characteristic.

Indirect Discrimination

Indirect discrimination occurs where a policy, practice or requirement applies equally to everyone but places people sharing a protected characteristic at a particular disadvantage without objective justification.

Harassment

Harassment is unwanted conduct related to a protected characteristic which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.

This includes sexual harassment and harassment by third parties where applicable.

Victimisation

Victimisation occurs when someone is treated unfairly because they have:

- raised concerns regarding discrimination;
- made or supported a complaint;
- acted as a witness; or
- exercised rights under equality legislation.

Swindon Tuition Centre will not tolerate victimisation of any individual exercising their rights under this policy.

Reasonable Adjustments

Reasonable adjustments are changes or adaptations made to remove or reduce disadvantages experienced by disabled people.

The organisation is committed to considering and implementing reasonable adjustments wherever reasonably practicable.

Positive Action

Positive action means lawful steps taken to remove disadvantages, encourage participation or address under-representation experienced by people who share a protected characteristic.

Positive action is different from positive discrimination, which is generally unlawful.

Guiding Principles

Swindon Tuition Centre is committed to fostering a culture where equality, diversity and inclusion are embedded throughout all aspects of organisational life.

The organisation will:

- promote dignity, respect and fairness;
- value diversity and different perspectives;
- provide equitable opportunities for learners, staff and applicants;
- remove barriers to participation wherever reasonably practicable;
- make reasonable adjustments where appropriate;
- challenge discrimination, harassment, bullying and victimisation;
- promote inclusive leadership and decision-making;
- support wellbeing and belonging;
- comply with equality legislation and safeguarding responsibilities;
- promote organisational learning and continuous improvement.

Every individual has a responsibility to contribute positively to an inclusive organisational culture.

Protected Characteristics in Practice

Swindon Tuition Centre recognises and respects the nine protected characteristics defined within the Equality Act 2010.

We are committed to ensuring that no learner, member of staff, volunteer, applicant or visitor is treated less favourably because of:

- age;
- disability;
- gender reassignment;
- marriage or civil partnership;
- pregnancy or maternity;
- race (including colour, nationality and ethnic or national origin);
- religion or belief;
- sex;
- sexual orientation.

The organisation is committed to ensuring these characteristics are recognised, respected and appropriately considered when making decisions relating to recruitment, employment, education, safeguarding and service delivery.

Where appropriate, reasonable adjustments will be considered to remove barriers to participation and support equitable outcomes.

Inclusive Practice

Swindon Tuition Centre promotes inclusive practice by:

- treating everyone with dignity and respect;
- recognising individual strengths, experiences and needs;
- making reasonable adjustments where appropriate;
- promoting accessible learning and working environments;
- encouraging diverse perspectives and experiences;
- challenging stereotypes, prejudice and discrimination;
- embedding equality, diversity and inclusion into decision-making;
- fostering a culture of belonging where everyone feels safe, valued and able to contribute.

Inclusive practice is expected in all aspects of organisational life, including education, safeguarding, recruitment, employment and leadership.

Identifying and Supporting Individual Learner Needs at Referral

Swindon Tuition Centre recognises the importance of identifying and understanding each learner's individual needs before a placement commences, to ensure that appropriate support, reasonable adjustments and safeguarding arrangements can be considered.

As part of the referral and placement planning process, STC will work collaboratively with the commissioning organisation, placing school, parents/carers and relevant professionals, where appropriate, to obtain sufficient information about the learner's needs.

This may include:

- Special educational needs and disabilities (SEND), including Education, Health and Care Plans (EHCPs), where applicable.
- Physical disabilities, medical conditions and accessibility requirements.
- Social, emotional and mental health (SEMH) needs, including known triggers, support strategies and reasonable adjustments.
- Communication, sensory and learning needs.
- Relevant safeguarding considerations and individual risk assessments.
- Cultural, religious or other individual requirements relevant to accessing provision.
- Existing support plans, behaviour strategies and educational targets.

Information provided at referral will be reviewed by the relevant AP Manager and Designated Safeguarding Lead (DSL), as appropriate, to identify potential barriers to participation, determine reasonable adjustments and assess whether the proposed provision can safely and appropriately meet the learner's needs.

Where further clarification or specialist advice is required, this will be sought from the commissioning organisation or relevant professionals before placement arrangements are confirmed.

Identified needs and agreed adjustments will inform individual learning plans, risk assessments, support arrangements and the delivery of provision. These arrangements will be reviewed as necessary throughout the placement, particularly where a learner's needs change.

All referral information will be handled confidentially and shared only with those who require it for legitimate educational, safeguarding or operational purposes, in accordance with STC's Data Protection and Safeguarding Policies.

Roles and Responsibilities

Everyone's Responsibility

Equality, diversity and inclusion are everyone's responsibility.

Every individual working for or on behalf of Swindon Tuition Centre is expected to contribute to an inclusive, respectful and equitable organisational culture.

Discrimination, harassment, victimisation and bullying will not be tolerated.

Proprietor / Owner and Director

The Proprietor / Owner and Director is responsible for:

- promoting an inclusive organisational culture;
- ensuring compliance with equality legislation;
- allocating appropriate resources;

- monitoring organisational performance;
- ensuring equality considerations inform strategic decision-making.

Leadership Team

The Leadership Team is responsible for:

- leading by example;
- embedding equality, diversity and inclusion throughout the organisation;
- ensuring policies and procedures remain fair and inclusive;
- responding appropriately to concerns;
- promoting organisational learning.

Human Resources

Human Resources will:

- provide advice regarding employment legislation;
- support managers in implementing this policy;
- advise on reasonable adjustments;
- monitor equality-related employment matters where appropriate;
- support inclusive recruitment and employment practices.

Managers

Managers are responsible for:

- promoting inclusive working practices;
- identifying and removing unnecessary barriers;
- considering reasonable adjustments;
- responding appropriately to concerns regarding discrimination, harassment or victimisation;
- treating individuals fairly and consistently.

Staff

All staff are expected to:

- treat others with dignity and respect;
- contribute positively to an inclusive culture;
- challenge inappropriate behaviour where appropriate;
- report concerns promptly;
- comply with this policy and associated organisational policies.

Learners

Learners are expected to:

- treat others respectfully;
- value diversity;
- contribute positively to an inclusive learning environment;
- report concerns to a trusted member of staff.

Equality for Learners

Swindon Tuition Centre is committed to ensuring that every learner has equitable access to education, support and opportunities, regardless of their background, identity or individual circumstances. We recognise that learners accessing alternative provision may face a range of barriers to education, including special educational needs and disabilities (SEND), adverse childhood experiences, trauma, mental health needs, social disadvantage or other protected characteristics. The organisation is committed to:

• promoting high aspirations for every learner;

• removing barriers to participation wherever reasonably practicable;

• making reasonable adjustments in accordance with the Equality Act 2010;

• providing inclusive, trauma-informed and person-centred practice;

• promoting positive behaviour through supportive and restorative approaches;

• ensuring safeguarding arrangements are equitable and inclusive;

• recognising and celebrating diversity within our learner community;

• promoting learner voice and participation in decision-making;

• ensuring learners are treated with dignity, fairness and respect.

Equality, diversity and inclusion are embedded throughout curriculum delivery, safeguarding, attendance, behaviour management and learner support.

Equality in Employment

Swindon Tuition Centre is committed to providing fair, inclusive and equitable employment practices throughout the employee lifecycle. Employment decisions will be based on merit, skills,

qualifications, experience and organisational need. The organisation is committed to promoting equality throughout:

• recruitment and selection;

• induction;

• probation;

• training and professional development;

• promotion opportunities;

• performance management;

• flexible working;

• remuneration and benefits;

• absence management;

• disciplinary and grievance procedures;

• termination of employment.

The organisation will actively consider reasonable adjustments throughout employment and will work collaboratively with staff to remove barriers wherever reasonably practicable.

Inclusive Employment Practices

Swindon Tuition Centre recognises that different individuals may require different forms of support to enable them to thrive at work. Where appropriate, the organisation will consider:

• reasonable adjustments for disabled staff;

• workplace adjustments during pregnancy and maternity;

• support relating to menopause where appropriate;

• support for neurodivergent staff;

• flexible working arrangements;

• adjustments relating to religion or belief;

• support for carers;

• wellbeing support.

Managers are expected to work collaboratively with staff to identify practical solutions that support both individual wellbeing and organisational effectiveness.

Where appropriate, advice will be sought from Human Resources and Occupational Health to support reasonable adjustments and inclusive workplace practices.

Recruitment & Selection

Swindon Tuition Centre is committed to fair, transparent and inclusive recruitment practices. Recruitment decisions will be made objectively and without unlawful discrimination. The organisation will:

• advertise vacancies fairly;

• encourage applications from diverse backgrounds;

• provide reasonable adjustments during recruitment where appropriate;

• use objective selection criteria;

• appoint the most suitable candidate based on merit and organisational need;

• comply with safer recruitment requirements;

• ensure recruitment processes are accessible wherever reasonably practicable.

Recruitment will be undertaken in accordance with the Safer Recruitment Policy and associated employment procedures.

Responding to Discrimination, Harassment and Victimisation

Swindon Tuition Centre is committed to ensuring that concerns relating to discrimination, harassment, bullying, victimisation or other inappropriate conduct are taken seriously and responded to promptly, fairly and proportionately.

Everyone has the right to work and learn in an environment that is safe, respectful and free from unlawful discrimination.

Concerns should be raised as early as possible to enable appropriate support and resolution.

Where appropriate, concerns may be raised with:

- a Line Manager;
- Human Resources;
- the Designated Safeguarding Lead (where safeguarding concerns are identified);
- a member of the Leadership Team;
- the Proprietor / Owner and Director.

Where the concern relates to one of the above individuals, it should be raised with another appropriate senior leader.

The organisation recognises that some concerns may be capable of informal resolution, whilst others will require formal investigation.

All concerns will be managed sensitively, confidentially and in accordance with the organisation's relevant policies and procedures.

Sexual Harassment

Swindon Tuition Centre is committed to taking reasonable steps to prevent sexual harassment and other forms of unlawful harassment within the workplace.

Sexual harassment will not be tolerated under any circumstances.

The organisation will:

- promote a culture of dignity and respect;
- provide clear reporting routes;
- investigate concerns appropriately;
- take prompt action where concerns are substantiated;
- support those affected;
- review learning arising from incidents to reduce future risk.

This commitment reflects the organisation's responsibilities under the **Worker Protection (Amendment of Equality Act 2010) Act 2023**.

Victimisation

No individual will suffer disadvantage because they have:

- raised a genuine concern;
- made or supported a complaint;
- acted as a witness;
- exercised rights under equality legislation.

Victimisation may itself result in disciplinary action.

Monitoring and Quality Assurance

Swindon Tuition Centre will regularly review equality, diversity and inclusion arrangements to ensure they remain effective, proportionate and reflective of current legislation and best practice.

Quality assurance activities may include:

- policy review;
- workforce monitoring where appropriate;
- recruitment monitoring;
- learner outcomes;
- safeguarding reviews;
- complaints analysis;
- staff feedback;
- commissioner feedback;
- organisational learning reviews;
- review of equality-related training and professional development.

Themes and trends will be considered by the Leadership Team to support continuous improvement.

Organisational Learning

Swindon Tuition Centre recognises that promoting equality, diversity and inclusion is an ongoing process of reflection, learning and improvement.

Learning arising from complaints, safeguarding concerns, recruitment activity, staff feedback, learner voice and organisational reviews will be used to:

- improve policies and procedures;
- strengthen inclusive practice;
- inform staff training;
- identify barriers to participation;
- improve leadership practice;
- support positive organisational culture.

The organisation is committed to reviewing and developing its practices to ensure equality, diversity and inclusion remain embedded throughout all aspects of organisational life.

Related Policies

This policy should be read alongside:

- Staff & Volunteers Code of Conduct
- Safeguarding & Child Protection Policy
- Low-Level Concerns Policy
- Managing Allegations and Concerns About Adults Policy
- Whistleblowing (Speaking Up) Policy
- Safer Recruitment Policy
- Flexible Working Policy
- Staff Absence Policy
- Disciplinary & Grievance Policy
- Capability Policy
- Complaints Policy
- Data Protection Policy

Appendix A – Protected Characteristics Summary

Protected Characteristic	Examples
Age	Young and older people
Disability	Physical, mental health, neurodiversity and long-term conditions meeting the Equality Act definition
Gender reassignment	Individuals proposing to undergo, undergoing or having undergone gender reassignment
Marriage & Civil Partnership	Married people and civil partners (employment context)
Pregnancy & Maternity	Pregnancy, maternity leave and related rights
Race	Colour, nationality, ethnic or national origin
Religion or Belief	Religious and philosophical beliefs, including lack of belief
Sex	Male and female
Sexual Orientation	Orientation towards people of the same, opposite or any gender

Appendix B – Reporting Route Guide

If your concern relates to...	Refer to...
Discrimination, harassment or victimisation	Equality, Diversity & Inclusion Policy
Your own employment issue	Disciplinary & Grievance Policy / Grievance Procedure
Safeguarding concern about a child	Safeguarding & Child Protection Policy
Behaviour of an adult below the harm threshold	Low-Level Concerns Policy
Allegation meeting the harm threshold	Managing Allegations and Concerns About Adults Policy
Serious organisational wrongdoing	Whistleblowing (Speaking Up) Policy

Final Statement

Swindon Tuition Centre is committed to creating an inclusive organisation where every individual is treated with dignity, fairness and respect. By embedding equality, diversity and inclusion throughout our culture, decision-making and practice, we aim to remove barriers, promote opportunity, strengthen safeguarding and foster a workplace and learning environment in which everyone can thrive.