



TITLE		REF	VERSION
Equality and Diversity Policy		LS014	8
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EQUALITY, DIVERSITY & INCLUSION POLICY

Policy context: our vision, values and purpose

At Activate Learning, we are committed to becoming an extraordinary provider of learning for the learners, employers and communities we serve. Our Learning Philosophy recognises that people learn and develop best when they feel emotionally secure and when they work in a safe environment. The principles of fairness, diversity and inclusion are central to supporting emotional wellbeing and psychological safety, which are vital in achieving our vision. These principles are also at the core of our values: ‘we transform lives’, ‘we act with trust and integrity’ and ‘we value everyone’.

This policy outlines the rights of people who interact with our organisation, our responsibilities, and what we’re doing to address discrimination and disadvantage at Activate Learning.

Policy scope

At Activate Learning, matters of equity, diversity, inclusion are **everyone’s business** and **everyone’s responsibility**. This policy should be read alongside current Activate Learning policies and procedures relating to the conduct expected of learners (also referred to as students), service users, staff including managers and senior leaders, and volunteers including governors.

Activate Learning embraces diversity, actively opposes discrimination, and works to create fair opportunities for everyone to develop their full potential. This policy recognises and builds upon equality legislation and legal requirements.

It is everyone’s responsibility to constructively challenge the discriminatory behaviour of others, and to reflect on their own biases to develop an anti-discriminatory approach.

Wherever possible, we will endeavour to address breaches of this policy as opportunities to learn, whilst protecting the safety and rights of anyone being discriminated against. However, breaches of this policy may also lead to formal action, including disciplinary action towards staff, and exercising our right to refuse anyone access to our services in the interests of people's safety and rights not to experience discrimination and harassment.

Related policies

- Comments, Suggestions, Complaints Policy
- Disciplinary Procedure
- Gender Identity Procedure
- Grievance Policy
- Learning and Development Policy
- Professional Conduct Policy
- Safeguarding & Prevent Policy
- Sexual Harassment Procedure
- Social Media Policy
- Student Behaviour Policy
- Wellbeing Policy
- Workplace Standards Policy

Definitions

We use the following definitions for key terms in this policy:

- **Discrimination:** Treating some people differently than others. Discrimination can sometimes be unlawful. There are some examples of different types of discrimination in the Legislation section of this policy.
- **Equality:** Giving everyone the same resources or opportunities regardless of their identity and experiences
- **Equity:** Treating everyone fairly by acknowledging that everyone is different, so people will need different support to ensure equal outcomes
- **Diversity:** Acknowledging, respecting, and valuing our differences, recognising that everyone is unique and that nobody is a stereotype
- **Inclusion:** Creating an environment in which everyone is truly respected, valued, and listened to, where decisions are made as much as possible with the people affected by them, where we can freely be ourselves and where we are equally empowered to participate fully in opportunities at Activate Learning

- **Anti-discriminatory approach/practice:** Actively challenging discrimination when we witness it, maintaining awareness of and challenging our own conscious and unconscious bias, and working with each other to further our learning and understanding of diverse experiences. This is so that we can create a positive, safe, and healthy environment for everyone.
- **Intersectionality:** Intersectionality is about understanding how different aspects of someone's identity interact to create unique experiences of privilege or oppression. It reminds us that we should not overlook one aspect of identity in favour of another. We should never assume that people's experiences, feelings or support needs are the same, even when they share intersectional identities.

Legislation

[The Equality Act \(2010\)](#) legally protects people from discrimination (treating people differently based on a particular aspect of their identity) in the workplace and wider society. It is illegal to discriminate against someone because of their age, disability (including mental ill health), gender reassignment, race, religion or belief, sexual orientation, marriage or civil partnership status, or their pregnancy or maternity status. This includes direct discrimination, indirect discrimination (applying a rule to everyone which is unfair to some) and discriminating against someone because of their association with another person who is protected by the Equality Act (2010).

We take our responsibilities under the Equality Act (2010) very seriously, and recognise that discrimination exists in other areas too, so we're working hard to address discrimination in all forms. For example, we're proud to support people experiencing socio-economic inequalities, and to be a gender-inclusive organisation.

The Equality Act 2010 identifies the following types of discrimination:

- **Direct discrimination:** treating someone differently because of how you perceive an aspect of their identity. This includes discriminating against someone because they have a relationship with someone else with a protective characteristic which you respond to in a discriminatory way (this is called association discrimination), and discriminating against someone who you believe to have a protected characteristic which you respond to in a discriminatory way (this is called perception discrimination).
- **Indirect discrimination:** when a working practice, policy or rule is the same for everyone but has a worse effect on someone in relation to one of their protected characteristics.
- **Harassment:** unwanted behaviour, including that of a sexual nature, that violates someone's dignity and/or creating an intimidating, hostile, degrading, humiliating or offensive environment for someone.

- **Victimisation:** when someone is treated unfairly or less favourably because they have supported someone in making a complaint or an allegation of discrimination, or because they personally have made an allegation of discrimination.
- **Discrimination arising from a disability:** discriminating because of something that results from a disability, not because of the disability itself. This does not require a comparison with how anyone else is treated.
- **Failure to make reasonable adjustments:** an organisation does not make reasonable adjustments (changes to remove or reduce a disadvantage related to someone's disability) for an employee or someone applying for a job.

The Equality Act 2010 introduced a Public Sector Equality Duty which requires Activate Learning to work to:

- eliminate discrimination, harassment and victimisation
- advance equality of opportunity
- foster good relations.

Our commitments

We have set out some key commitments in this policy which will support us to meet our legal obligations and strive towards best practice in Equality, Diversity and Inclusion (EDI).

Our commitment to everyone

We will:

- strive to make all our services are accessible
- actively challenge and tackle all forms of prejudice, discrimination and stereotypical attitudes
- deal with all allegations of discrimination, harassment, and victimisation sensitively and investigate fairly and thoroughly (please see the Complaints, Comments and Suggestions Policy for how we do this)
- treat any form of discrimination, harassment or victimisation carried out by a member of staff as a matter for possible disciplinary action (please see the Professional Conduct Policy, Social Media Policy and Disciplinary Procedure for how we address this).

Our commitment to Learners

We will:

- strive to provide an inclusive teaching and learning environment that supports individuals' unique needs and best EDI practices in Education, including additional learning support

(ALS) tailored to individual needs for learners who require ALS to support their learning and progression

- embed EDI within all aspects of the learner journey from curriculum planning through to marketing our provision, recruiting learners and teaching staff, oncourse teaching, learning, assessment tutorial and enrichment activities
- provide multiple learner voice opportunities for all learners to feed into the development of all aspects of the learner experience
- make clear our expectations and commitments to equality, diversity and inclusion in our marketing and recruitment materials and events, during the learner and staff admissions processes and again during induction
- celebrate equality, diversity and inclusion (for example via Activate Learning posters, tutorial activities and inclusion calendar events).

Our commitment to Staff

We will:

- strive to recruit, employ, retain and develop a diverse workforce which reflects the local community and the learner population (we will track this through regular demographics data reporting)
- make clear our expectations and commitments to equality, diversity and inclusion throughout employment and during all recruitment processes
- implement positive action initiatives where appropriate to address underrepresentation or disadvantage (for example our Dual Mentoring Programme, which provides leadership mentoring and seeks to upskill staff from racialised communities, who are currently underrepresented at our organisation)
- provide ongoing continuous professional development in equality, diversity, and inclusion to equip staff to recognise and embed diversity and to challenge any form of discrimination (see Learning and Development Policy)
- provide reasonable adjustments for staff who are or who become disabled and for people applying for roles at Activate Learning
- embed equality, diversity and inclusion throughout workforce practice (including providing good customer care, embedding EDI in teaching and learning, and providing a high-quality service and experience for everyone)
- provide multiple staff voice opportunities for all employees to feed into the development of all aspects of the staff experience (such as the Inclusion in Action Network, Staff Voice Forum, the annual staff survey and through discussion on our Viva Engage platform).

To hold us accountable and track progress in meeting our commitments, in addition to routinely gathering and analysing diversity data and feedback from staff and learners, Activate Learning's EDI Committee will publish an annual report reflecting on the progress we have made so far and setting clear, measurable objectives for the academic year ahead.

Our EDI Committee

Activate Learning coordinates its core EDI work through a committee of colleagues that support Learner experience, workplace culture, communications and public relations, and more. The committee's goal is to take a joined-up approach to EDI work across our organisation, which spans several counties and connects with a vast number of people in a diverse range of professional relationships. Further details on the EDI Committee's membership and purpose are provided in its Terms of Reference, available to staff on request.

The EDI Committee is responsible for regularly seeking out and responding to feedback from minoritised communities and using this information alongside, internal, local, national and sector-specific data to help shape Activate Learning's EDI journey and support the embedding of EDI best practice into our organisation's culture as shared in this policy. The EDI Committee produces an annual report tracking our progress against key objectives which are set each academic year. These objectives will follow a SMART goals format to support our accountability against specific, measurable, achievable, relevant and time-bound objectives.

The Inclusion in Action Network

Inclusion in Action Network meetings are bi-monthly online meetings open to all staff at Activate Learning. Whether staff wish to attend to represent their teams because they have the capacity to do so, or because they have a personal interest, or for any other reason, all are encouraged and welcome to be part of this valuable space. There is never an obligation to share personal identities and experiences – it is entirely at your discretion, with you setting your own boundaries. As an organisation, we will try to make sure people can prioritise attendance wherever possible.

These meetings are a platform for all staff to be able to discuss EDI matters that affect their work, staff experience, and Activate Learning's EDI culture, with the goals of furthering our knowledge and understanding, and coming up with actions we can personally take to address disadvantage and discrimination in our daily work and behaviours. Inclusion in Action Network meetings also allow us to monitor progress on our organisation's objectives to ensure that access, experience, and outcomes reflect the needs of all our colleagues, those we serve, volunteer with and work alongside, and those we are yet to serve.

All Inclusion in Action Network meeting attendees are requested to share their learning from the meetings as well as any assigned actions with their teams and be supported by their line manager and colleagues to do this.

Duties and Responsibilities

At Activate Learning, matters of equity, diversity, inclusion are everyone's business and everyone's responsibility.

Everyone, including Learners, Volunteers and Service Users:

- is personally responsible for their own behaviour and ensuring they comply with the Equality Act (2010)
- must treat everyone with dignity and respect (in line with our Student Behaviour Policy and/or our Professional Conduct Policy)
- must report any concerns relating to discrimination that they have for themselves or others. Please see details on how to report below.

Staff Responsibilities

All staff must also:

- commit to developing their understanding of the impact of discrimination and the benefits of equality, diversity and inclusion – both in the context of our Further Education and Safeguarding work, but also in the context of contributing to a safe and healthy workplace culture for everyone. An example of this might be staff attending learning and development opportunities to ensure they understand the principles of this policy and their relevance and application in their job role and responsibilities.
- challenge discrimination directly if it is safe to do so, whenever they witness it, or later, in a safe space
- raise breaches of this policy with their line manager, Human Resources, or by using our whistleblowing procedure where appropriate when staff witness or experience discrimination
- challenge the organisation through discussions with line managers, Human Resources, or the EDI Manager, should they feel that Activate Learning needs to be doing more to address or prevent discrimination.

Manager Responsibilities

Managers (including senior managers and leaders) must also:

- encourage and support workers to complete EDI training, attend learning and development opportunities, identify any further training needs for themselves and their teams and request this through the EDI Manager or Human Resources.
- help teams to work effectively together and be equally supportive of every team member
- make sure that access to learning and development opportunities is fair for all, and that learning from Inclusion in Action Network is shared within their teams.
- consult with the EDI Manager for advice and support regarding any EDI issues
- support team members effectively and appropriately at work, and make sure that necessary modifications and reasonable adjustments are made to working arrangements to meet each member's needs.
- take an active and visible lead in driving forward equality, diversity and inclusion
- oversee implementation of this policy within their teams.

Activate Learning's EDI Manager is additionally responsible for offering guidance and expertise in advancing our EDI work.

Governor responsibilities

Governors must hold Activate Learning accountable and consider all work in connection with our EDI policy, vision, and commitments.

They must also:

- request, receive and respond to relevant reports, data monitoring and feedback from staff, learners and volunteers
- agree appropriate EDI targets and monitor progress towards these.

How to report discrimination

Anyone can raise, either informally or formally, complaints of unfair and/or discriminatory treatment. Learners, volunteers, contractors and members of the public can do this through our [Comments, Suggestions, Complaints process](#).

Staff should follow the process set out in our Professional Conduct Policy, Safeguarding and Prevent Policy, Grievance Procedure, Gender Inclusion Procedure and/or Sexual Harassment Procedure where relevant and can speak to their line manager or a Human Resources Business Partner should they require help.

Equality Impact Assessment

An Equality Impact Assessment (EIA) will be carried out whenever substantial changes are made to this policy, or every three years, in line with Activate Learning's approach to all policies and procedures. An EIA is a tool to help organisations to consider the impact of a policy in relation to the nine protected characteristics of the Equality Act. Its aim is to help our organisation to look for opportunities to promote equality that may have previously been missed or could be better used, as well as to recognise negative impacts that can be removed or reduced wherever possible. It is a helpful tool in reducing risk of discrimination. Copies of the EIA for this policy are available on request from our Policies department.

