



Equality, Diversity, Inclusion & Belonging Policy

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Policy Approval

Approval Required:	Please Check		Annual Review Required:	Please Check	
	Yes ☒	No ☐		Yes ☒	No ☐
Approval Panel:	Shane Carter				
Approved By:	Name		Signature		Date
	Shane Carter				01/08/2026
Policy Review Date:	August 2027				
Policy Writer/s:	Shane Carter				

Policy Statement

Shape Academy is committed to equality, diversity, inclusion and belonging (EDIB). We aim to create a safe, respectful and accessible environment in which employees, workers, job applicants, apprentices, learners, contractors, associates, visitors and other stakeholders are valued, able to participate and supported to achieve their potential.

We will not tolerate unlawful discrimination, harassment, sexual harassment, bullying or victimisation. We will take proportionate, proactive steps to remove barriers, prevent unlawful conduct, advance equality of opportunity and foster good relations. We will promote dignity, respect and belonging throughout recruitment, employment, learning, assessment, progression, safeguarding, procurement and the delivery of our services.

We also promote the fundamental British values of democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs, while complying with equality and human-rights law.

Belonging is an organisational commitment rather than a protected characteristic or separate legal right. It means creating a culture in which people feel respected, heard, included and able to contribute without being expected to hide or change who they are.

Purpose

This policy explains:

- the standards of conduct expected at Shape Academy;
- the legal protections that apply;
- how we prevent and respond to discrimination, harassment, bullying and victimisation;
- how reasonable adjustments and accessibility needs are addressed;
- how concerns can be raised and resolved; and
- how compliance and improvement will be monitored.

Scope

This policy applies to all employees, workers, job applicants, apprentices, learners, candidates, contractors, consultants, associates, agency staff, volunteers, governors or directors, visitors, employers, customers, suppliers and other people engaging with Shape Academy.

It applies during work and learning, recruitment and admissions, assessment, work placements, trips, events, social activities connected with Shape Academy, online learning, email, messaging, social media and other digital communications. It may also apply to conduct outside work or learning where there is a sufficient connection with Shape Academy or an impact on safety, dignity, working relationships or organisational reputation.

Everyone covered by this policy must treat others with dignity and respect. Employees and workers must also take reasonable steps to prevent inappropriate conduct where it is safe and appropriate to do so, report concerns promptly and cooperate with investigations.

Legal and regulatory framework

This policy is informed by the law and guidance applicable in England and Great Britain, including:

- the Equality Act 2010;
- the Worker Protection (Amendment of Equality Act 2010) Act 2023;
- the Employment Rights Act 2025, including harassment provisions due to take effect on 30 October 2026;
- the Human Rights Act 1998;
- the Public Sector Equality Duty in section 149 of the Equality Act 2010, where it applies to Shape Academy or to functions carried out on behalf of a public authority; and
- relevant statutory codes, technical guidance and regulatory requirements, including guidance issued by the Equality and Human Rights Commission, the Department for Education, Ofsted and apprenticeship funding or quality bodies.

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Where the law changes, Shape Academy will apply the legal requirement in force even if this policy has not yet been updated

Protected Characteristics

The Equality Act 2010 protects people in relation to:

1. age;
2. disability;
3. gender reassignment;
4. marriage and civil partnership;
5. pregnancy and maternity;
6. race, including colour, nationality, and ethnic or national origins;
7. religion or belief, including lack of religion or belief;
8. sex
9. sexual orientation.

The precise protection available can vary according to the legal context. Shape Academy will also promote inclusion and respectful treatment in relation to characteristics and circumstances not expressly protected by the Equality Act, such as caring responsibilities, care experience, socio-economic background, language, immigration status, health conditions, neurodivergence and working pattern, where lawful and appropriate.

Forms of Prohibited Conduct

Direct discrimination

Treating someone less favourably because of a protected characteristic. Protection can include discrimination because a person is perceived to have a protected characteristic or because of their association with someone who has one.

Indirect discrimination

Applying a provision, criterion or practice to everyone that puts, or would put, people who share a protected characteristic at a particular disadvantage and puts the individual concerned at that disadvantage, unless it can be objectively justified as a proportionate means of achieving a legitimate aim.

Discrimination arising from disability

Treating a disabled person unfavourably because of something arising in consequence of their disability, where the treatment cannot be objectively justified. The statutory rules concerning knowledge of disability apply.

Failure to make reasonable adjustments

Failing to take reasonable steps to avoid a substantial disadvantage experienced by a disabled person because of a provision, criterion or practice, a physical feature, or the absence of an auxiliary aid. The duty may be anticipatory in education and service delivery. A disabled person must not be required to pay the cost of a reasonable adjustment.

Harassment

Unwanted conduct related to age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment. In deciding whether conduct has that effect, the person's perception, the other circumstances and whether it is reasonable for the conduct to have that effect will be considered.

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Harassment can be verbal, non-verbal, physical or digital; intentional or unintentional; open or subtle; a single incident or a pattern. A person may be harassed because of another person's characteristic, because they are perceived to have a characteristic, or even where they do not possess the characteristic to which the conduct relates.

Sexual harassment

Unwanted conduct of a sexual nature that has the purpose or effect described in section 6.5. It also includes less favourable treatment because a person rejected or submitted to unwanted sexual conduct, or to unwanted conduct related to sex or gender reassignment, where that conduct had the relevant purpose or effect.

Shape Academy will take all reasonable steps to prevent sexual harassment of employees and workers. This standard meets the current preventative duty and is intended to meet the strengthened duty taking effect on 30 October 2026. Preventative action will include risk assessment, clear reporting routes, appropriate training, action on warning signs and complaints, and controls addressing risks created by third parties and working arrangements.

Victimisation

Subjecting someone to a detriment because they did, or are believed to have done or may do, a protected act. Protected acts include bringing proceedings under the Equality Act, giving evidence or information, making an allegation of a breach, or doing another thing for the purposes of or in connection with the Act. Protection does not extend to a false allegation made in bad faith.

Bullying

Bullying is offensive, intimidating, malicious or insulting behaviour, or an abuse or misuse of power, that undermines, humiliates, denigrates or injures another person. Bullying is not a separate offence under the Equality Act and need not relate to a protected characteristic, but it is prohibited by this policy and may lead to disciplinary action.

Legitimate, reasonable and respectful management, teaching, assessment, feedback or performance action is not bullying merely because it is unwelcome.

Examples of unacceptable behaviour

Depending on the circumstances, unacceptable conduct may include:

- slurs, derogatory language, stereotypes, "banter", jokes, ridicule or insults;
- unwanted sexual comments, questions, messages, images, touching, advances or requests for sexual favours;
- threats or favourable or unfavourable treatment linked to sexual conduct;
- intrusive comments about a person's body, identity, disability, transition, relationships, pregnancy, religion, race or private life;
- deliberate and repeated misuse of a person's name or pronouns as a means of humiliating or targeting them;
- excluding someone from opportunities, communication, learning, work or social activity for a discriminatory reason;
- displaying or sharing offensive material, including online;
- physical intimidation, assault, stalking or sexual violence;
- unfair allocation of work, learning opportunities, assessment or responsibility;
- imposing avoidable barriers or refusing to consider reasonable adjustments;
- pressuring another person to participate in religious, political or personal activity;
- retaliating against someone who raises or supports a concern; or
- harassment by a customer, employer, learner, contractor, visitor or other third party.

This list is illustrative, not exhaustive. Conduct described as a joke, banter, customary or unintended may still breach this policy or the law.

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Equality, Inclusion and Accessibility in Practice

Shape Academy will:

- make recruitment, admissions, induction, teaching, learning, assessment, progression and employment decisions using fair, transparent and relevant criteria;
- review policies, practices and learning materials for unjustified barriers and bias;
- ensure learning resources reflect diverse people, experiences and communities accurately and respectfully;
- challenge prejudiced language and stereotypes promptly and proportionately;
- provide accessible information and communication support where reasonably required, including alternative formats and interpretation or translation where appropriate;
- seek to identify and address attainment, participation, experience or progression gaps;
- respect privacy and process personal data in accordance with data-protection requirements;
- consult affected people where appropriate and avoid making assumptions about individual needs or identity;
- consider lawful positive action where evidence shows disadvantage, different needs or disproportionately low participation; and
- ensure that equality considerations inform quality assurance, safeguarding, employer engagement, subcontracting and procurement.

Treating people fairly does not always mean treating everyone identically. Different or additional support may be appropriate to remove disadvantage, meet different needs or enable equal participation.

Disability and Reasonable Adjustments

Shape Academy welcomes disabled and neurodivergent people and people with long-term physical or mental health conditions. We encourage individuals to tell an appropriate member of staff about barriers or support needs, but we recognise that disclosure is a personal matter and will handle information sensitively.

Adjustment requests will be considered promptly, individually and in consultation with the person concerned. We will record agreed actions and review their effectiveness. Examples may include accessible formats, assistive technology, changes to communication, premises or working arrangements, additional time, rest breaks, modified teaching or assessment arrangements, or support during recruitment.

Where a requested adjustment is not considered reasonable or cannot be provided, Shape Academy will explain the reasons and explore effective alternatives. No person will be penalised for requesting an adjustment.

Preventing Harassment and Discrimination

Shape Academy will take proactive, proportionate steps, including:

1. assigning clear leadership responsibility;
2. assessing equality and harassment risks, including risks arising from placements, lone working, travel, events, online activity, power imbalances and third parties;
3. maintaining clear behavioural standards and confidential reporting routes;
4. providing appropriate induction and refresher training;
5. ensuring managers and teaching staff know how to intervene and respond;
6. acting promptly on complaints, warning signs, patterns and informal intelligence;
7. taking reasonable steps to protect employees and learners from third-party harassment;
8. recording actions and reviewing whether preventive measures are effective; and
9. ensuring non-disclosure or confidentiality wording is not used to conceal unlawful conduct or prevent lawful reporting.

From 30 October 2026, Shape Academy will apply the statutory employer duties concerning all reasonable steps to prevent sexual harassment and not permitting third-party harassment. Until then, these commitments apply as Shape Academy policy wherever they exceed the minimum legal requirement.

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Roles and Responsibilities

Directors and senior leaders

Directors and senior leaders are accountable for implementation, resources, risk oversight and reviewing equality information and actions. They must model expected behaviour and ensure concerns are addressed.

Managers, tutors, assessors and other staff

They must:

- apply this policy consistently;
- promote inclusion and challenge inappropriate behaviour;
- consider accessibility and reasonable adjustments;
- identify and escalate risks or patterns;
- respond sensitively to disclosures and avoid promising absolute confidentiality; and
- complete required training and cooperate with monitoring or investigations.

Equality, Diversity, Inclusion and Belonging Lead

The EDIB Lead coordinates advice, training, monitoring, policy review and improvement activity, while ensuring concerns are routed to the appropriate manager, safeguarding lead or investigator.

Everyone covered by this policy

Everyone must behave respectfully, avoid prohibited conduct, speak up or seek advice where appropriate, cooperate with reasonable preventive measures and investigations, and avoid retaliation.

Raising a Concern

A person may raise a concern about something they experienced, witnessed or learned about. They do not need to confront the person concerned before reporting it.

Concerns may be raised with:

- a line manager, tutor, assessor or another trusted member of staff;
- the EDIB Lead: Shane Carter
- the Managing Director: Shane Carter
- the Designated Safeguarding Lead where there is a safeguarding concern: Shane Carter or
- another route provided in the grievance, complaints, whistleblowing or safeguarding procedure.

Anonymous reports will be considered, although anonymity may limit the action or investigation possible. Immediate danger, suspected crime or safeguarding risk should be reported through the emergency and safeguarding arrangements without delay.

An informal resolution may be considered where the person raising the concern agrees and it is safe and appropriate. Mediation or an informal approach will not be required in serious cases and will not be used to pressure a person into facing an alleged perpetrator.

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Formal Complaints and Investigation

A formal complaint should, where possible, describe what happened, when and where it happened, who was involved, any witnesses or relevant material, and the outcome sought. Lack of complete information will not automatically prevent consideration.

Shape Academy will:

- acknowledge the concern and explain the process;
- appoint an impartial person with appropriate competence to investigate;
- act promptly while allowing sufficient time for a fair investigation;
- conduct an objective, trauma-informed and proportionate investigation;
- give the respondent a fair opportunity to understand and answer the allegations;
- permit employees and workers to be accompanied at formal hearings where the law or relevant procedure provides that right, and consider support for learners and others;
- keep information confidential so far as reasonably possible, sharing it only where necessary;
- consider interim measures based on risk, without treating them as a finding of wrongdoing;
- decide the matter on the balance of probabilities where an internal factual finding is required; and
- communicate the outcome and any available review or appeal route in writing, subject to privacy and data-protection obligations.

Interim measures may include changed reporting lines, timetables, learning groups, duties, locations or contact arrangements, paid suspension where justified, or other safeguards. They will be neutral, proportionate, reviewed regularly and designed, so far as possible, not to disadvantage the person who raised the concern.

The applicable complaints, grievance, disciplinary, safeguarding or learner procedure should be read alongside this policy. Any stated appeal deadline in that procedure will apply. Where procedures conflict, the organisation will identify the appropriate route and explain it to the parties.

Outcomes and Support

A breach may result in action under the relevant disciplinary, learner behaviour, contractual or complaints procedure. Serious discrimination, harassment, sexual harassment, bullying, victimisation, violence or retaliation may amount to gross misconduct or a serious learner or contractual breach.

Outcomes may also include training, supervision, restorative action where freely agreed and appropriate, reasonable adjustments, changes to systems or risk controls, support for affected people, and monitoring to prevent recurrence.

A complaint that is not upheld will not lead to action against the complainant merely because it was mistaken or unsupported. Deliberately false allegations made in bad faith may be addressed under the relevant procedure, but this provision must not be used to deter genuine reporting.

Protection From Retaliation and Confidentiality

Retaliation, intimidation or adverse treatment connected with raising, supporting or participating in a concern is prohibited and may constitute victimisation or misconduct. Any such behaviour should be reported promptly.

Information will be handled sensitively and only shared where there is a legitimate need, legal duty or safeguarding reason. Absolute confidentiality cannot be guaranteed. Participants must not obstruct an investigation or improperly disclose information, but nothing in this policy prevents lawful whistleblowing, reporting a crime, obtaining legal or professional advice, cooperating with a regulator or exercising statutory rights.

Record Keeping, Monitoring and Review

Shape Academy will keep appropriate records of reports, adjustments, decisions, actions and outcomes in accordance with data-protection and retention requirements.

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Anonymised or aggregated information will be reviewed, where lawful and proportionate, to identify patterns, assess the effectiveness of preventive steps and inform improvement. Monitoring may cover recruitment, participation, retention, achievement, progression, complaints, disciplinary outcomes, adjustments, staff and learner experience, and training completion.

Leaders will review this policy at least annually and after significant incidents, findings, organisational changes or changes in law or official guidance. Consultation with staff, learners and apprentices will be undertaken where appropriate.

Related Policies and Procedures

This policy should be read with the following, where applicable:

- complaints procedure;
- employee grievance and disciplinary procedures;
- learner/apprentice behaviour and disciplinary procedure;
- safeguarding and Prevent policies;
- whistleblowing policy;
- reasonable adjustments and accessibility arrangements;
- safer recruitment and selection policy;
- dignity at work / anti-bullying and harassment procedure;
- data protection and privacy policies;
- social media and acceptable-use policies; and
- health and safety and lone-working arrangements.

External Advice and Reporting

Nothing in this policy removes anyone's right to seek independent advice or use an external reporting route. Depending on the circumstances, support may be available from ACAS, the Equality Advisory and Support Service, a trade union, Citizens Advice, the police, a regulator, the relevant funding body or a legal adviser. Statutory time limits may apply and are not paused by an internal process.

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