



Equality, Diversity and Inclusion Policy

Secondary Alternative Education Provision

Policy Owner	In-Tuition Learning
Effective Date	August 2026
Review Date	August 2027

Our commitment

In-Tuition Learning is committed to fair access, dignity, respect and meaningful participation. We will identify and remove unnecessary barriers, make reasonable adjustments, challenge discrimination and create a learning environment in which every learner can belong and achieve.

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1. Purpose and principles

This policy explains how In-Tuition Learning promotes equality, values diversity and supports inclusion across its education, assessment, employment and business activities. It replaces a short two-page policy that focused mainly on qualifications and broad statements of intent. The revised policy retains those commitments while adding practical arrangements for access, reasonable adjustments, behaviour, complaints, staff conduct and monitoring.

Equality does not always mean treating everyone identically. It means making fair, lawful and proportionate decisions, recognising different needs and removing barriers that place an individual or group at an unjustified disadvantage.

- treat every learner, parent or carer, employee, applicant, visitor and partner with dignity and respect
- provide education and services without unlawful discrimination
- anticipate and respond to barriers experienced by disabled people
- promote an inclusive culture in which difference is respected and harmful stereotypes are challenged
- make decisions transparently and on relevant evidence
- take concerns seriously and protect people from victimisation for raising them

Respect for every person

In-Tuition Learning will respond to unfair or degrading treatment whether or not the behaviour meets the technical legal definition of discrimination or harassment. Safeguarding, behaviour and professional-conduct expectations may be higher than the minimum legal threshold.

2. Scope and application

This policy applies to all In-Tuition Learning activities and to all learners, including children under 18 and adults aged 18 to 25. It applies to employees, tutors, volunteers, agency workers, contractors, applicants, parents and carers, visitors and organisations working on our behalf.

It covers face-to-face and remote tuition, admissions and placement discussions, curriculum and resources, assessment, educational visits, communication, recruitment, employment, procurement, partnerships and use of premises. Behaviour outside normal sessions may also be addressed where it affects safety, dignity, access to education or the reputation and lawful operation of In-Tuition Learning.

3. Legal framework and protected characteristics

The Equality Act 2010 protects people from unlawful discrimination, harassment and victimisation in employment, education, services and public functions, with different provisions applying in different contexts. The protected characteristics are:

- age

- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race, including colour, nationality and ethnic or national origins
- religion or belief, including lack of religion or belief
- sex
- sexual orientation

The exact protection attached to a characteristic can vary according to the activity and the relevant part of the Act. In-Tuition Learning will apply the statutory definitions and current authoritative guidance while maintaining a respectful and inclusive environment for all.

Where In-Tuition Learning is carrying out a public function or is required through commissioning arrangements to support public-sector equality duties, it will have due regard to eliminating unlawful conduct, advancing equality of opportunity and fostering good relations. This wording does not claim that every activity of the organisation is automatically subject to the Public Sector Equality Duty.

Unlawful conduct

This policy covers direct discrimination, indirect discrimination, discrimination arising from disability, failure to make reasonable adjustments, harassment where legally applicable, sexual harassment, pregnancy and maternity discrimination, and victimisation.

4. Responsibilities

Role	Key responsibilities
Director - John Burchall	Has overall responsibility for this policy, lawful decision-making, reasonable adjustments, staff expectations, complaints, monitoring and liaison with commissioners or external bodies.
All staff and tutors	Must model inclusive conduct, use respectful language, follow agreed adjustments, challenge or report discriminatory behaviour, and avoid assumptions about learners or families.
Learners	Are expected to treat others with dignity, follow behaviour expectations, avoid discriminatory language or conduct, and report concerns or barriers.
Parents and carers	Are encouraged to share relevant needs, support respectful

Role	Key responsibilities
	communication and raise concerns promptly. Adult learners will normally make decisions and give consent for themselves.
Contractors and partners	Must comply with equality law and the standards in this policy when working with or on behalf of In-Tuition Learning.

The Director is responsible for overseeing the implementation of this policy and may seek independent professional, legal, awarding-body, local-authority or commissioner advice where impartiality or specialist expertise is required.

5. Inclusive access, admissions and placement decisions

Placement decisions will be based on whether In-Tuition Learning can safely and effectively meet the learner's educational needs within the proposed package, not on stereotypes or assumptions connected to a protected characteristic.

- information about the service will be clear and available in an accessible format where reasonably requested
- referrals and enquiries will be considered consistently using relevant educational, safeguarding, staffing and premises information
- the learner and, where appropriate, their parent, carer or commissioner will be involved in identifying barriers and support needs
- reasonable adjustments will be considered before concluding that a learner cannot access a provision or activity
- any decision not to offer or continue a placement will be recorded with clear, relevant reasons and communicated appropriately
- commissioning or funding constraints will not be disguised as equality or safeguarding reasons

Positive action may be used where lawful to address disadvantage, meet different needs or improve participation. Positive action is not the same as unlawful positive discrimination.

6. Disability, SEND and reasonable adjustments

In-Tuition Learning will take positive and anticipatory steps to reduce substantial disadvantage experienced by disabled learners and service users. Adjustments may relate to a provision, criterion or practice; a physical feature; or an auxiliary aid or service.

- adjusting the timing, pace, location or method of tuition
- providing information in an alternative format or using assistive technology
- allowing rest breaks, movement breaks or a quieter environment
- adapting communication and checking understanding
- modifying a routine or behaviour response where disability is relevant
- supporting access to assessment arrangements through the appropriate awarding-body process
- planning access to visits, community activity and emergency procedures

- working with the learner, family, commissioner and relevant professionals to implement EHCP or support-plan requirements within the agreed placement

What is reasonable depends on the circumstances, including effectiveness, practicality, cost, available resources, health and safety, the interests of others and whether the adjustment would fundamentally alter the nature or integrity of the service or assessment. A refusal will not be based on convenience alone and the reasons will be recorded.

No charge for adjustments

A disabled learner or service user will not be charged for a reasonable adjustment that In-Tuition Learning is legally required to provide.

7. Teaching, curriculum and learning materials

Teaching and learning will be planned to be inclusive, age-appropriate and responsive to learners who may have experienced exclusion, trauma, disrupted education or unmet SEND needs.

- resources and examples should avoid unnecessary stereotypes and degrading representations
- staff should pronounce and use learners' names correctly and respect lawful, reasonable requests about communication
- different cultures, families, identities, beliefs and experiences should be represented accurately and sensitively
- controversial issues should be taught in a balanced, evidence-informed and respectful way
- staff must not promote partisan political views and must take reasonable steps to present opposing views where political issues are discussed
- religion or belief, including non-religious belief, should be handled without coercion or ridicule
- sex-based, disability-related or other legal requirements will be explained accurately where relevant, while every learner continues to be treated with dignity

Curriculum choices may reflect an individual learner's starting point, goals and placement plan. Different provision is not discriminatory where it is a proportionate response to educational need and does not lower expectations without justification.

8. Assessment, qualifications and special consideration

Assessment will be fair, valid and consistent. Access arrangements and reasonable adjustments support access to assessment but must not undermine the competence being assessed or the integrity of a qualification.

- assessment instructions and criteria will be communicated clearly
- staff will identify potential access needs early and obtain evidence required by the relevant awarding body
- only approved arrangements will be used for externally regulated qualifications
- special consideration will be requested where a temporary event or circumstance has materially affected performance and the relevant rules allow it
- outcomes will not be altered merely to produce equal results

- concerns about an academic decision will be considered under the Complaints and Appeals Policy and, where applicable, the awarding body's process

9. Behaviour, bullying, harassment and victimisation

Discriminatory bullying, prejudicial language, sexual harassment, online abuse, deliberate exclusion and conduct that violates another person's dignity are not acceptable. This includes conduct based on a person's actual or perceived characteristic, or their association with someone who has a protected characteristic.

Staff will respond proportionately to the seriousness, context, impact, intent, repetition and safeguarding implications. A restorative or educational response may be appropriate, but it will not replace protective action where there is risk of harm.

- ensure immediate safety and support
- listen without dismissing the person's experience
- record the facts and language used
- consider safeguarding, child-on-child abuse, adult safeguarding or criminal concerns
- apply behaviour or staff procedures consistently and make reasonable adjustments where required
- avoid forcing the affected person into mediation or face-to-face resolution
- monitor for retaliation, recurrence or victimisation
- communicate outcomes within confidentiality and data-protection limits

10. Learner voice, participation and communication

Learners will be given meaningful opportunities to express their views about access, belonging, teaching, safety and treatment. Communication methods will be adjusted where necessary to support disability, literacy, language, communication or emotional-regulation needs.

- explain rights, expectations and complaint routes in accessible language
- offer a trusted adult or advocate where appropriate
- seek the learner's views when planning adjustments
- avoid assuming that a parent or carer should speak for an adult learner unless the learner consents or another lawful basis applies
- use interpreters or communication support where reasonably necessary and avoid relying on children to interpret sensitive matters
- take account of intersectional disadvantage, where several characteristics or life circumstances combine to create barriers

11. Staff, recruitment and professional conduct

Employment decisions will be based on role requirements, competence, conduct and lawful safer-recruitment considerations. In-Tuition Learning will not unlawfully discriminate in advertising, recruitment, pay, training, allocation of work, performance management, discipline or termination.

- make reasonable adjustments for disabled applicants and workers
- use objective and relevant selection criteria

- avoid intrusive questions about protected characteristics except where lawful and necessary
- ensure equal-opportunity monitoring information, where collected, is separated from selection decisions
- address discriminatory conduct through supervision, capability, disciplinary, safeguarding or complaints procedures as appropriate
- provide proportionate equality and inclusion information or training
- protect staff from harassment by learners, visitors, contractors or other third parties through reasonable preventive and responsive steps

12. Complaints, concerns and safeguarding

A person may raise an equality concern informally or make a formal complaint under the Complaints and Appeals Policy. A concern will not be rejected merely because the person has not used legal terminology or cannot identify the relevant protected characteristic.

Concerns involving abuse, exploitation, harmful sexual behaviour, hate crime, risk of significant harm or an adult with care and support needs will also be considered under safeguarding procedures. Immediate danger or suspected crime should be reported to the emergency services without delay.

No victimisation

No person should be subjected to a detriment because they raised, supported or gave evidence about an equality concern in good faith. Deliberately false or malicious allegations may be addressed, but an unsubstantiated concern is not automatically malicious.

13. Monitoring, information and review

In-Tuition Learning will use relevant and proportionate information to identify barriers, patterns and improvement needs. Monitoring may include qualitative evidence, individual case reviews, feedback, complaints, outcomes and other available data.

- complaints, incidents and discriminatory language
- requests for and implementation of reasonable adjustments
- access, engagement, attendance and outcomes where meaningful and lawful
- placement decisions and reasons for non-admission or ending provision
- learner, parent, staff and commissioner feedback
- accessibility of information, premises and digital systems
- training, supervision and actions arising from review

Equality information is special-category personal data in many circumstances and will be collected only where there is a clear purpose and lawful basis. It will be kept secure, shared on a need-to-know basis, retained appropriately and not used to make unfair decisions.

This policy will be reviewed annually and sooner following a significant complaint, legal development, change in services or evidence that practice is creating an unjustified disadvantage.

14. Related policies

- Safeguarding and Child Protection Policy
- Complaints and Appeals Policy
- Health and Safety Policy
- SEND and reasonable-adjustment arrangements
- Behaviour and Anti-Bullying Policy
- Safer Recruitment Policy
- Data Protection and Privacy Policy
- Assessment, Access Arrangements and Malpractice procedures
- Whistleblowing Policy
- Staff Code of Conduct

Appendix 1 - Equality impact prompt

Use this prompt when introducing or significantly changing a policy, practice, activity or placement arrangement.

Prompt	Questions to consider
Purpose	What is the intended outcome and who will be affected?
Evidence	What do we know about learner needs, barriers, previous concerns and likely impact?
Protected characteristics	Could the proposal affect people differently because of a protected characteristic or combination of characteristics?
Disability	Could a provision, criterion, practice, physical feature or lack of an auxiliary aid create substantial disadvantage?
Alternatives	Is there a less disadvantageous way to achieve the same legitimate aim?
Consultation	Whose views should be sought, including the learner and relevant professionals?
Decision	What changes, safeguards or reasonable adjustments are required?
Record and review	Who approved the decision, what evidence was used, and when will impact be reviewed?

Appendix 2 - Reasonable adjustment record

This form may be adapted. Record only information needed to make and review the adjustment.

Learner / service user

Date and person completing record

Barrier or substantial disadvantage identified

Requested adjustment and the person’s views

Evidence or professional advice considered

Adjustment agreed

Appendix 2 - Reasonable adjustment record (continued)

Who will implement it and by when
Any limits, risks or assessment rules considered
If not agreed, clear reasons and alternatives considered
Review date and outcome
People informed and consent / information- sharing basis

Appendix 3 - Reporting discrimination or harassment

Step	Action	What to do
1	Make safe	Respond to immediate risk, seek help and call 999 where necessary.
2	Listen	Take the concern seriously. Do not argue about intent or require the person to prove the legal definition.
3	Record	Record what happened, the words used, date, place, witnesses impact and any immediate action.
4	Report	Tell the Director promptly. Use safeguarding routes as well as a child or adult may be at risk.
5	Assess	Consider support, evidence, confidentiality, reasonable adjustments, safeguarding, conduct and external advice.
6	Act	Apply the appropriate complaints, behaviour, disciplinary, safeguarding or referral process.
7	Review	Check that the behaviour has stopped, support remains effective and there has been no victimisation.

External advice

If a matter is complex or cannot be handled impartially by the Director, In-Tuition Learning may seek independent advice or request an independent review. This may include the commissioner, awarding body, Equality Advisory and Support Service, ACA, local authority, safeguarding service, police or legal adviser, according to the issue.