Diversity, Equity and Inclusion Policy

POLICY APPROVAL

Approval Required	Indicate with a tick (✓)		**Annual Review Required**	Indicate with a tick (✓)	
	Yes ✓	No		Yes ✓	No
Approval Panel	Loren Janes				
Approved by	Name: Loren Janes		Signature:	Date: September 2025	
Policy Review Date	September 2026				

Policy Statement

Futures Changing aims to provide high-quality learning in relation to promoting protected characteristics. We value and celebrate the diversity in our society and are striving to promote and reflect that diversity within Futures Changing, and we work to demonstrate Fundamental British Values; democracy, the rule of law, individual liberty, and mutual respect and tolerance for those with different faiths and beliefs.

Futures Changing is committed to diversity, equity and inclusion in all aspects of learning, training, and employment. We are fully commitment to safeguarding children, young people, and vulnerable adults in line with KCSIE 2025 and recognise that DEI is integral to creating a safe, supportive, and respectful environment**.**

The Diversity, Equity and Inclusion Policy and Procedures set out our aims and how we will meet the legal requirements identified in the Equality Act 2010.

Relevant legislation:

- Equality Act 2010
- Children Act 1989/2004
- KCSIE 2025 statutory guidance on safeguarding and promoting welfare

Introduction

This policy describes the minimum standards and guidance relating to developing a cooperative and non-discriminatory environment which is both supportive and challenging and dealing with instances of harassment, bullying and discrimination. At Futures Changing we believe that all staff and learners must be equally respected and treated as individuals, taking positive account of age, gender, religion or belief, ethnic origin, cultural origin, sexual preferences, disability, pregnancy or maternity and marital status. We will constantly implement to apply this principle to all our policies, procedures, delivery and interactions across the projects.

We aim to promote equality of opportunity and diversity for learners and staff, so that the ethos and culture prevent any form of direct or indirect discriminatory behaviour. Leaders, staff and learners will not tolerate prejudiced behaviour. We believe that equality for all is a basic human right and actively oppose all forms of unlawful and unfair discrimination.

Staff will be quick to challenge stereotypes and the use of derogatory language in sessions and throughout the apprenticeship journey. Resources and teaching strategies will always reflect and value the diversity of learners' experiences and provide learners with a comprehensive understanding of people and communities beyond their immediate experience.

The organisation's open culture will actively promote all aspects of learners' welfare. Learners will be safe and feel safe always. They will understand how to keep themselves and others safe in different situations and settings. They will trust leaders to take rapid and appropriate action to resolve any concerns they have.

Scope

This policy applies to all learners, staff, contractors, volunteers, and visitors and covers all aspects of employment, learning, assessment, and participation. It is intended to explicitly include SEND learners, LAC (Looked After Children), and other vulnerable groups**.**

The Protected Characteristics

The following characteristics are protected under the 2010 Equality Act:

- age.
- disability.

- gender reassignment.
- marriage and civil partnership.
- pregnancy and maternity.
- race.
- religion or belief.
- sex.
- sexual orientation.

No discrimination will be accepted with regards to the gender of the individual. All learners will be encouraged to participate in all activities regardless of gender or age. All staff and learners will have the same opportunities and be treated in the same manner regardless of their gender or age. No discrimination will be made with regards to individual sexual preferences and marital status.
No individual will be refused a place on the grounds of religion, ethnic origin, or culture. Information will be available to all whenever possible, this will be in the first language if English is not understood, or an interpreter will be used to ensure information is exchanged accurately in a timely manner. All learners and staff will be expected to respect individual religion, ethnicity, and cultural differences. The curriculum encourages both staff and learners to treat everyone with equal concern and respect and to value each other. Questions about racial and cultural differences will be answered in a clear, factual way that is understood in an appropriate manner. Positive support for a learner's home language and cultures will be given as this provides a framework for learning English.

Futures Changing is committed to the integration of learners and staff with a disability or additional needs. Extra help or special arrangements may be required including 'reasonable adjustment'. The organisation will not discriminate directly or indirectly against a disabled learner or staff member. It is recommended that all disabilities or special needs are made known, so any necessary reasonable adjustments can be made as soon as possible to promote engagement in work and learning.

Futures Changing is committed to ensuring inclusive teaching materials, assessment methods, and learning environments. Adaptations for learners with SEND or other additional needs, ensuring equity while maintaining safeguarding standards will be sought to promote an inclusive learning environment.

Offensive Behaviour

The organisation will not allow harassment or bullying to learners or staff. This can include unwelcome comments or behaviour, repetitive criticism, intimidation, insulting, aggressive, undermining self-confidence or the misuse of power. Any action which makes the recipient feels upset, humiliated, threatened or vulnerable. If the offensive behaviour is made by learners, an on-the-spot explanation of why it is not accepted will be made and the behaviour policy followed. Any breach of this policy by an adult or young person visiting the centre may result in disciplinary action.

Definitions

- Direct discrimination - means treating people less favourably because of their race, disability, race, gender, the colour of their skin, ethnic and national origin, nationality, sexual orientation, religion or age.
- Indirect discrimination - occurs when an unjustifiable requirement or condition, whether intentional or not affects adults or children from certain groups.

Harassment

- Unwanted conduct, whether verbal or not, which is of a sexual or racial nature or which refers to or is based upon a person's disability, or other conduct based on someone's race and/or gender and/or disability which affects the dignity of men or women at work; or
- Bullying of colleagues, especially junior colleagues, by intimidating behaviour; or

- Unfavourable conduct at work, whether verbal or non-verbal, towards someone based on his/her disability which could affect his/her dignity at work.

Harassment or any form of discrimination will not be tolerated under any circumstances. A member of staff who harasses or discriminates against another employee or client or customer of the Company will be subject to the Futures Changing disciplinary procedure. In serious cases, such behaviour may constitute gross misconduct and result in summary dismissal.

Harassment generally may include any unwanted verbal or physical abuse and/or advances and/or behaviour which an employee may find offensive and which causes them to feel threatened, humiliated, patronized, distressed, or harassed. It will not necessarily be a defence that such incidents consist of words or behaviour which might be claimed to be "commonplace", or which were intended as a joke or were not intended to be offensive.

Harassment may be deliberate or unconscious, open, or covert, direct or indirect, an isolated incident or a series of repeated actions. It may also include, in certain circumstances, off duty conduct.

It is the duty and responsibility of Futures Changing and every employee to stop all types of harassment and discrimination in the workplace. It is only through the efforts of individual employees that harassment and discrimination can be eradicated. We must all recognise that every employee in the Company has the right not to be subjected to any form of harassment or discrimination.

Racial Harassment: Racial harassment is racial discrimination and is contrary to the Company's equal opportunities policy. It is also unlawful. This type of harassment will not be tolerated under any circumstances and the Company will take prompt action upon becoming aware that such incidents have taken place. Examples of racial harassment may include:

- abusive language and racist jokes.
- racial name calling.
- the display or circulation of racially offensive written or visual material including graffiti.
- physical threats, assault and insulting behaviour or gestures.
- open hostility towards workers of a racial group, including organised hostility in the workplace.
- unfair allocation of work and responsibilities.
- exclusion from normal workplace conversation or social events, i.e. being "frozen out" The above examples are not exhaustive, and each incident of harassment or discrimination will be viewed on its individual facts.
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Sexual Harassment: Sexual harassment is similarly sex discrimination, unlawful and contrary to the Company's policy. It is defined as unwanted behaviour of a sexual nature by one employee towards another. Examples of sexual harassment may include:

- insensitive jokes and/or pranks.
- lewd comments about appearance.
- unnecessary bodily or physical contact.
- displays of sexually offensive material, for example, pin-ups and calendars.
- requests for sexual favours.
- speculation about an employee's private life and/or sexual activities.
- threatened or actual sexual violence.
- the threat of dismissal, loss of promotion etc. for refusal of sexual favours.
- exclusion from normal workplace conversation and social events.

Whilst the above list gives examples of sexual harassment, harassment takes many forms from relatively mild sexual banter to actual physical violence. The above examples are not intended to be exhaustive. Harassment of an individual in this manner based on their sexual orientation (i.e. because they are

homosexual, transsexual or undergoing ‘‘sex change treatment”) will also be regarded by the Company as sexual harassment and will not be tolerated.

Harassment on grounds of disability Harassment of an individual who has a disability or who has had a disability in the past is unlawful. It is also contrary to the Company’s policy, which seeks to ensure that people with disabilities receive treatment that is fair, equitable and consistent with their skills and abilities. In accordance with statutory requirements, the Company recognizes that a person with a disability is someone who has or has had a physical or mental impairment that has a substantial and long-term adverse effect on his/her normal day-to-day activities. Therefore, depending on individual circumstances a person who has been seriously injured, has or had a progressive illness, significant learning difficulties or poor hearing, vision or mobility may be a person with a disability.

Harassment on grounds of disability may include the following:

- abusive or insensitive language.
- inappropriate jokes or pranks.
- non-verbal offensive gestures (e.g. staring at an affliction).
- inappropriate assumptions about the capabilities of a disabled person.
- unfair allocation of work and responsibilities.
- exclusion from normal workplace conversation or social events.
- physical mistreatment (e.g. jostling or assault). The above examples are not exhaustive, and each incident of harassment or discrimination will be viewed on its individual facts. As part of the Company’s Diversity, Equity and Inclusion policy, we will make every effort, if a disabled person joins the Company or if an existing employee becomes disabled, to make such adjustments as are required by law, whether in their existing job or in a suitable available alternative. The Company will seek to ensure that the needs of people with disabilities are considered generally in both the context of the Company’s working practices and in the nature of its premises and continuing services.

Victimisation

Victimisation occurs when a member of staff treats another member of staff less favourably because that other person has:

- brought proceedings alleging that he or she has been discriminated against contrary to this Policy; or
- indicated that they intend to make such a claim or claims; or
- assisted a colleague to make a claim.

Victimisation will not be tolerated under any circumstances and any member of staff who victimizes another employee will be subject to the Company’s disciplinary procedure. In serious cases, such behaviour may constitute gross misconduct resulting in summary dismissal.

Safeguarding and Diversity, Equity and Inclusion

Staff must be aware that learners from minority or protected groups may be more vulnerable to abuse, harassment, or exploitation.

They must also:

- Highlight responsibility to report concerns promptly (to DSL/DSO) in line with safeguarding procedures.
- Promote child-on-child abuse awareness and ensure equality is considered in handling allegations.

- Ensure that bullying, harassment, discrimination, or exclusion are addressed immediately and appropriately.

Complaints and Disciplinary Action

Where an employee believes that he/she is being harassed, victimised or discriminated against contrary to the law or to the Diversity, Equity and Inclusion policy, he/she can invoke the complaints procedure, whether formal or informal, against the harasser or discriminator. Every complaint will be investigated and dealt with sympathetically without bias and as quickly as is practicable. Every effort will be made to ensure that individuals who make a complaint in good faith will not suffer any further detriment or be victimised because of making such a complaint. Any complaint of victimisation will be dealt with seriously, promptly and confidentially. Victimisation will result in disciplinary action, which may include summary dismissal.

Informal Procedure

- Prior to adopting the formal procedure set out below, an informal approach may be taken.
- If an individual feel, that he/she is or has been subjected to harassment and/or discrimination or victimisation and considers that the informal procedure is appropriate he/she should, if possible, advise the harasser that the behaviour is unwelcome, must be stopped and is interpreted as harassment and/or discrimination and/or victimisation as defined by the Company's policy statement. If preferred, this may be in writing.
- If the behaviour does not cease or the employee finds approaching the harasser difficult, further informal assistance is available. Employees, who wish to discuss such a complaint in confidence, should contact the managing director.

Formal Procedure

Where the informal method fails, or serious harassment or discrimination occurs or if the individual prefers, employees are advised to bring a formal complaint against the alleged harasser or discriminator and to seek assistance as above in doing so. The complaint should be made in writing and, where possible, state the following:

- the name of the alleged harasser/discriminator.
- the nature of the harassment/discrimination/victimisation.
- the date and time when the harassment/discrimination or victimisation occurred.
- the names of any witnesses to the harassment/discrimination or victimisation; and details of any action, which may already have been taken by the complainant to stop the harassment/discrimination or victimisation. The complaint should be sent or given to the where a complaint of harassment, discrimination or victimisation is received; consideration will be given to whether it would be helpful and/or practicable to separate the alleged harasser/discriminator from the complainant. This may involve the temporary transfer of the alleged harasser/discriminator or the complainant to another department or suspension with pay until the complaint has been resolved.
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The Director will carry out a thorough investigation as quickly as possible, maintaining as much confidentiality as possible always. The complainant should be aware, however, that if the complaint is to be properly investigated, other employees may have to be asked for witness statements. All employees involved in the investigation are expected to respect the need for confidentiality. Failure to do so will be considered a disciplinary offence. Copies of any witness statements taken will be made available to the alleged harasser and the complainant.

Witnesses will be encouraged to appear at any hearing if requested by either party. It is acknowledged that some witnesses may be reluctant to do so. In these circumstances, The Director will, if necessary, adjourn the hearing and ask supplementary questions of witnesses in private. The complainant may if he/she wishes, be supported throughout the procedure and hearing by a colleague of his/her choice.

The employee accused of harassment or discrimination will have the right to be accompanied at the hearing in accordance with the policy if the offence is proved the severity of the penalty imposed on the harasser will be consistent with those detailed in the disciplinary procedure.

Serious harassment or acts of discrimination or victimisation may result in summary dismissal. Where a lesser penalty is appropriate, for example, a written warning, this may be coupled with action to ensure that the complainant is able to continue working without embarrassment or anxiety. After discussion with the complainant, the Director may transfer the harasser to a different work area or arrange for an amendment of working practices to minimize contact between the two employees. If the complainant wishes, his/her own transfer will be arranged, subject to practical limitations.

The result of the hearing will be confirmed in writing to both employees. If the complainant is not satisfied with the way his/her complaint has been handled, he/she may appeal to the nominated person. The appeal should be made in writing within 5 working days of the first hearing. The decision of this second hearing will be sent in writing to both parties and will be final. An employee who receives a warning or is dismissed for harassment or discrimination may appeal against the penalty in accordance with the appeals procedure in the Company's disciplinary procedure.

Policy Requirements

All staff will follow this policy statement always. Managers and other staff will ensure that this statement is followed through supervision and quality assurance processes.

Staff Responsibilities:

All Futures Changing staff have a responsibility to:

- Be aware of and implement the policy on Diversity, Equity and Inclusion.
- Promote a "challenge inequality and celebrate diversity" ethos.
- Undertake staff development appropriate to their role.
- Promptly report any discriminatory issues, unfair treatment, poor practice or misconduct to the Diversity, Equity and Inclusion Champion.
- Promote Diversity, Equity and Inclusion in induction, teaching and at learner progress reviews.

Management Responsibilities:

Futures Changing managers and directors have a responsibility to:

- Ensure that all staff, learners, sub-contractors and employers are aware of this policy and actively promote its implementation.
- Promote learning to ensure participation is representative of the local, regional and national demographical data.
- Ensure our learning environments are non-discriminatory and challenge negative behaviours towards race, religion, gender, disability or culture.
- Embrace a whole approach to challenging inequality and celebrate diversity.
- Ensure all staff are aware of the policy and ensure they receive appropriate and annual training and support to undertake their roles effectively.
- If Futures Changing is working with a partner and any Diversity, Equity and Inclusion issues the Futures Changing Diversity, Equity and Inclusion Champion will work with the partners' appointed person.
- Ensure learning resources and marketing literature will promote fair and equal access to teaching, learning and assessment. Care will be taken to avoid the use of statements and stereotypes that might reasonably be expected to give offence on the grounds of Age, Gender, Sexual Orientation, Disability, Race, and Religion & Belief.

- Collect data to analyse participation and achievement of under-represented groups by subject and programme area
- Process all data in accordance with the requirements of the Data Protection Act 1998.
- Learner registration forms ask to detail any additional support requirements that need to be in place. It is the responsibility of the Director to ensure that reasonable adjustments are in place to accommodate those with additional support requirements in time for the start of the training course.

Equal Opportunities

Futures Changing is fully committed to providing a good and harmonious working environment that offers equal treatment and equal opportunities for all its employees and where every employee is treated with respect and dignity.

Futures Changing recognises that the provision of equal opportunities in the workplace is not only good management practice; it also makes sound business sense.

The Futures Changing policy will help all employees develop their full potential so that the talents and resources of the workforce will be fully utilized to maximize the efficiency of the organisation.

Breaches of the Futures Changing Diversity, Equity and Inclusion and Inclusion policy will result in the Company's disciplinary procedure being invoked against the individuals responsible or involved.

Implementation

Futures Changing will ensure that:

- All employees follow the Equality, Diversity and Inclusion Policy and Process to ensure inclusion and success for all staff and employees.
- Meetings are held which introduce staff to the concept, policy and procedures e.g. Futures Changing Management and Leadership Team, Directorate Monthly Management and Curriculum Team meetings where the concept, specific instructions and any special responsibilities are discussed.
- The Board, Senior Leadership Team and all staff working with or on behalf of Futures Changing, whether employed directly or indirectly and external contractors, will receive a level of training appropriate to their role and level which will familiarise them with Diversity, Equity and Inclusion issues, clarify roles and responsibilities and Futures Changing policies and procedures, with refresher training at least every 2 years.
- Employers are fully aware of their duties in terms of Diversity, Equity and Inclusion and all learners are given guidance prior to their employment on Diversity, Equity and Inclusion and the support available from the Futures Changing.

There are procedures in place to identify and support all Futures Changing users. All teaching, learning and assessment observations, quality assurance processes and learner journey quality audits include the opportunity to report on Diversity, Equity and Inclusion and will be included in the lesson observation and quality briefings/training.

Futures Changing materials are monitored and evaluated on a regular basis to ensure that they promote Diversity, Equity and Inclusion and do not disadvantage particular groups of learners.

There are clear and designated procedures for all learners, including remote learners and staff to report breaches of the Diversity, Equity and Inclusion Policy and to report any concerns in relation to Radicalisation and Extremism.

All information relating to Diversity, Equity and Inclusion will be processed in accordance with the Data Protection Act 1998 and GDPR guidelines as set out in the Futures Changing's Data Protection Policy.

Communication Flow

- The Diversity, Equity and Inclusion Policy and Procedures are approved by Futures Changing Board.
- The Diversity, Equity and Inclusion Policy and Procedures are communicated to all staff through staff induction, staff intranet, email and training.
- Futures Changing team meetings are held regularly, and Diversity, Equity and Inclusion is a set agenda item.
- Regular updates are provided via the employee intranet.
- Staff and learners' views are regularly sought regarding Diversity, Equity and Inclusion at Futures Changing.
- Futures Changing marketing materials and job adverts have a clear statement reflecting the importance the Futures Changing places on Diversity, Equity and Inclusion.
- Diversity, Equity and Inclusion literature for staff and learners promotes Diversity, Equity and Inclusion across Futures Changing.
- Employer handbooks are provided for employers, which include the Diversity, Equity and Inclusion Policy and Procedures.
- Portfolio of programmes that enable us to meet a wide range of learner need, goals and aspirations.
- Futures Changing will develop links and partnerships with external community organisations to support the development of Diversity, Equity and Inclusion in our locality.

Recruitment

No vacancy will be advertised or publicised (internally or externally) in a way which discourages applications from any sector of the population.

All applications will be considered on merit. Everyone will be assessed against a set of objectives, non-discriminatory criteria that will be directly related to the demands of the vacancy.

All advertisements, application forms and other recruitment material will clearly state that we are an equal opportunities employer and will avoid statements or questions which tend to discourage applications for employment from any sector of the population.

All interviews will be conducted in accordance with the terms and spirit of this policy. The questions asked of candidates will be closely related to the selection criteria and will be asked to elicit information which will give a fair assessment of that applicant's ability to perform the tasks required by the vacancy. Specific questions will not be asked of candidates which make assumptions about a candidate's commitment or ability based on any of the grounds identified in the statement of this policy.

No one sector of the population will be disadvantaged or discriminated against in relation to the terms of employment offered or applied to them.

Futures Changing will, where appropriate, make reasonable adjustments to its arrangements for interviews and conditions of employment for disabled applicants where necessary to ensure that existing arrangements or conditions of employment do not place such applicants at a significant disadvantage to other applicants.

Promotion

This policy will be promoted using various mediums, all learners/apprentices/staff will be introduced to this policy at induction. Employers will be asked to accept our policy if their own is not deemed sufficient at initial assessment.

Commitment to the policy will be required from staff before completion of probation/induction, this will be repeated where necessary including review or changes in policy or legislation.

Training

Staff/Learners/Apprentices and where relevant Employers will be trained in the requirements of this policy. Training must be completed before achievement of a probationary period for staff and an introduction/induction period for learners/apprentices. Understanding of this policy will be confirmed periodically during learner progress reviews and staff annual appraisals.

No employee will be denied access to training on discriminatory grounds.

Specific and/or additional training will be made available for disabled employees as is reasonably necessary.

Monitoring

Futures Changing will regularly monitor the effectiveness of its processes and procedures to ensure that they are achieving our stated aims.

Futures Changing has appointed an Equality & Diversity Champion who is responsible for the monitoring of equal opportunities throughout the company.

Futures Changing will monitor the effectiveness of the Diversity, Equity and Inclusion Policy through the Personal Development, Welfare and Behaviour Action Group.

The Futures Changing will seek to ensure that Futures Changing policies and procedures, via Equality Impact Assessments are assessed on a regular basis to ensure they do not have a negative impact on any particular groups of people.

The following information is reviewed to monitor the effectiveness of the policy across Futures Changing:

- Enrolment trends and statistics
- Employee data
- Learner surveys feedback
- Self-assessment reports
- Diversity, Equity and Inclusion Impact Measures (EDIMs)
- Equality impact assessments
- Teaching, Learning and Assessment observations
- Internal verification feedback and standards verification reports
- Complaints, compliments and any subsequent actions
- Progression
- Outcomes for learners focused upon closing achievement gaps

Discipline

Any acts of discrimination or acts which contravene this policy will result in the disciplinary procedure being invoked against the individuals responsible or involved. In severe cases, summary dismissal may be justified. All members of staff are encouraged to use the procedure outlined in this Policy if they are harassed, discriminated or victimised. The Company takes all allegations seriously. However, if an allegation is made which the Company (after investigation) believes has been made dishonestly or maliciously, the Company may invoke the disciplinary procedure against the complainant. In serious cases, such behaviour may constitute gross misconduct and result in summary dismissal.

Equality Impact Audit Proforma

Audit Prompt	Response
Name of policy:	
Author of document:	
Responsible Senior Manager:	
Who does the policy apply to: • Staff • Learners (please indicate which groups) • Members of the general public (please specify who)	
Will the policy affect members of the target audience equally? If no, please indicate the specific groups targeted by the policy In targeting the policy at a specific group of people will members of other groups be disadvantaged. If yes, how will this be addressed? What information has been gathered about the diversity of the target audience? Attach details of information considered. How has this diversity been taken into account in writing the policy?	
Does this policy contain visual images? If yes, are these technical or cultural in nature? If cultural, do they reflect diversity? If yes, please indicate how.	
Please indicate how this policy supports Futures Changing in its General Equality Duty to: • Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act • Advance equality of opportunity between people who share a protected characteristic and those who do not foster good relations between people who share a protected characteristic and those who do not	
Please indicate any negative impacts identified in relation to the protected characteristics listed below, or how you have arrived at the view that there are not negative impacts in relation to these characteristics: Age | Disability | Gender reassignment | Marriage and civil partnership | Race | Religion or belief |Sex | Sexual orientation | Pregnancy.	
Is the policy free from discrimination on the grounds of? Additional Learning Needs | Economic Needs | Social Needs	
Please indicate who the policy has been considered by and/or who has been consulted about the policy. Has the policy been posted on the staff/learner intranet sites for consultation/review purposes? Did any equality issues arise from this?	
Can you identify any further consultations that might be necessary to ensure no adverse impact? If yes, please specify.	
Is this policy fit for purpose and in accordance with specific equality legislation?	Please tick: ❒ Yes ❒ No
Please record who this audit has been completed by (if by work group lead person to sign):	Name: Job Title: Date: