

EQUALITY, DIVERSITY AND INCLUSION POLICY





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Thrive Lincs Ltd

Organisation	Thrive Lincs Ltd
Document writer	Mark Haggis
Policy owner	Mark Haggis, Director
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1. Policy Statement

Thrive Lincs Ltd is committed to creating and maintaining a fair, inclusive, safe and respectful organisation in which people are treated with dignity and are able to participate without unlawful discrimination, harassment or victimisation.

We value the diversity of our workforce, learners, families, commissioners, professionals, contractors and communities. Equality, diversity and inclusion are relevant both to our responsibilities as an employer and to the way we design and deliver alternative education and support.

Thrive Lincs will make decisions on relevant, objective and lawful grounds; identify and remove unnecessary barriers; make reasonable adjustments where required; and respond appropriately to discrimination, harassment, bullying and victimisation.

2. Purpose

The aims of this policy are to:

- promote equality of opportunity and fair treatment;
- prevent unlawful discrimination, harassment and victimisation;
- support an inclusive workplace and learner experience;
- ensure recruitment, employment and development decisions are fair and evidence-based;
- identify and remove unnecessary barriers to participation;
- meet duties relating to reasonable adjustments for disabled people;
- take proactive steps to prevent sexual harassment at work;
- ensure equality considerations inform service delivery, safeguarding and organisational decision-making;
- provide clear routes for raising concerns; and
- monitor practice and use learning to improve.

3. Scope

This policy applies to employees, workers, job applicants, apprentices, agency workers and contractors to the extent that relevant legal protections and organisational responsibilities apply. Its behavioural expectations also apply to volunteers, work-experience participants and others representing Thrive Lincs.

The service-delivery principles apply to learners, parents/carers and others who use or interact with Thrive Lincs services.

The precise legal protection may differ according to the relationship and context. For example, Equality Act employment protections do not apply to every volunteer in the same way as they apply to employees and workers; Thrive Lincs nevertheless expects volunteers to be treated fairly and respectfully.



4. Legal Framework

This policy is principally informed by the Equality Act 2010, which protects people from unlawful discrimination in employment and in the provision of services and establishes duties relating to reasonable adjustments.

The nine protected characteristics under the Equality Act 2010 are:

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

How a protected characteristic applies can vary according to the part of the Equality Act and the particular context. Thrive Lincs will therefore avoid assuming that every protection operates identically in employment, education and service provision.

The Worker Protection (Amendment of Equality Act 2010) Act 2023 introduced a proactive employer duty, in force since 26 October 2024, to take reasonable steps to prevent sexual harassment of employees. Further protections under the Employment Rights Act 2025 are due to take effect on 30 October 2026, including a strengthened duty to take all reasonable steps to prevent sexual harassment and protection concerning harassment of employees by third parties. Thrive Lincs will prepare for and apply those strengthened requirements when they come into force.

5. Equality Beyond Protected Characteristics

Thrive Lincs recognises that people can experience disadvantage or barriers for reasons that are not themselves protected characteristics under the Equality Act 2010. These may include socioeconomic disadvantage, caring responsibilities, family circumstances, communication needs, neurodiversity, educational history or other individual circumstances.

Thrive Lincs may take these factors into account when seeking to remove practical barriers and promote inclusion, while distinguishing them from the statutory protected characteristics and applying the law correctly.

6. Forms of Unlawful Discrimination and Prohibited Conduct

Depending on the circumstances and the relevant part of the Equality Act, unlawful conduct may include:

- direct discrimination;
- indirect discrimination;
- harassment;
- sexual harassment;
- victimisation;
- discrimination arising from disability;
- failure to make reasonable adjustments;
- pregnancy and maternity discrimination; and
- discrimination because of association with, or perception of, a protected characteristic where the legal provisions apply.

Bullying is not a separate protected characteristic or a single statutory Equality Act concept, but bullying behaviour may amount to unlawful harassment, discrimination or other misconduct. Thrive Lincs does not tolerate bullying regardless of whether it meets a statutory discrimination definition.



7. Intersectionality and Individual Circumstances

People may experience disadvantage because of the interaction of more than one characteristic or circumstance. Thrive Lincs will consider the whole person's needs and circumstances rather than relying on assumptions about a single characteristic.

Decisions must be based on relevant evidence, individual circumstances and applicable legal duties.

8. Recruitment and Selection

Recruitment and selection will be fair, transparent and based on the genuine requirements of the role and safer-recruitment responsibilities.

Thrive Lincs will:

- use clear job descriptions and person specifications;
- avoid unnecessary criteria that could create unjustifiable barriers;
- assess candidates against relevant skills, qualifications, experience, aptitude and ability;
- make reasonable adjustments to recruitment processes for disabled applicants where required;
- avoid unlawful health or disability questions before an offer except where permitted by law;
- ensure safeguarding and suitability checks are applied consistently and lawfully; and
- retain recruitment information securely and in accordance with data-protection requirements.

Positive action may be considered where lawful and appropriate, but positive discrimination will not be used unless expressly permitted by law.

9. Employment, Pay, Development and Progression

Employment decisions concerning terms, pay, allocation of work, training, promotion, development, performance management, disciplinary action, redundancy and dismissal will be based on lawful and relevant criteria.

Part-time, fixed-term, variable-hours or other working arrangements must not be used as a basis for unlawful or otherwise prohibited less favourable treatment.

Managers should consider whether working practices create unintended barriers and whether changes, including reasonable adjustments or flexible arrangements, are appropriate.

10. Disability and Reasonable Adjustments

Thrive Lincs will comply with its duty to make reasonable adjustments for disabled employees, workers, applicants and service users where the Equality Act requires this.

Adjustments may include changes to recruitment arrangements, working patterns, communication methods, equipment, physical environments, duties, training, assessment, service delivery or access arrangements.

The appropriate adjustment will depend on the individual circumstances. Thrive Lincs will discuss needs sensitively and should not require a person to accept an adjustment that is unsuitable merely because it has been used for someone else.

Information about disability or health will be handled confidentially and shared only where there is a lawful and appropriate need.

11. Learners and Inclusive Alternative Provision

Thrive Lincs will seek to ensure that learners can access provision fairly and that decisions about admission, placement, timetabling, activities, support and progression are based on individual needs, safety, suitability and commissioning arrangements rather than stereotypes or unlawful discrimination.



Many Thrive Lincs learners have SEND or additional vulnerabilities. Equality and safeguarding responsibilities must therefore be considered together. Reasonable adjustments and accessible communication should be incorporated into planning where required.

Equality does not always mean treating everyone identically. Different or additional support may be required to remove disadvantage or meet individual needs.

12. Religious and Philosophical Belief

Thrive Lincs respects religion, non-religious belief and protected philosophical beliefs in accordance with the Equality Act.

Where reasonably practicable, employment and service arrangements may take account of religious observance, dress, dietary needs, prayer or religious holidays, balanced against safeguarding, health and safety, service delivery and the rights of others.

People may hold different and sometimes conflicting protected beliefs. Staff must maintain professional standards, respect the dignity and rights of others and must not harass, discriminate against, intimidate or improperly impose beliefs on colleagues or learners.

13. Sex, Gender Reassignment and Gender-Questioning Learners

Thrive Lincs will treat people with dignity and respect and will comply with the Equality Act protections relating to sex and gender reassignment.

Gender identity and gender expression are not separately listed protected characteristics under the Equality Act 2010. However, a person's circumstances may fall within the protected characteristic of gender reassignment, and other legal or organisational protections may also be relevant.

For children and young people who are questioning their gender, staff must avoid a one-size-fits-all response. Safeguarding, the learner's welfare, age, individual circumstances, parental involvement where appropriate, relevant clinical information and the commissioning setting's responsibilities must be considered.

Thrive Lincs will follow current safeguarding guidance and commissioner arrangements on matters such as social transition, privacy, single-sex facilities and activities where these issues arise, taking appropriate advice in complex cases.

14. Pregnancy, Maternity and Family-Related Needs

Pregnancy and maternity are protected under the Equality Act in the circumstances set out by law. Thrive Lincs will not treat a person unfavourably because of pregnancy or maternity where prohibited.

Risk assessments, working arrangements, leave and return-to-work arrangements will be managed in accordance with applicable employment and health and safety requirements.

Other family and caring responsibilities are not automatically protected characteristics, but Thrive Lincs will consider relevant statutory rights, flexible-working arrangements and practical barriers fairly.

15. Menopause

Menopause is not a separate protected characteristic, but treatment connected with menopause may engage protections including disability, age and sex depending on the circumstances.

Managers should respond sensitively and consider practical support or reasonable adjustments where appropriate. This may include working arrangements, breaks, access to facilities, temperature or ventilation measures, uniform considerations or other individual adjustments.

From April 2026, government measures have included voluntary action planning and guidance concerning gender equality and support for employees experiencing menopause, with further measures planned. Thrive Lincs will keep its arrangements under review as the legal framework develops.



16. Harassment, Sexual Harassment and Bullying

Thrive Lincs does not tolerate harassment, sexual harassment, bullying, intimidation or victimisation.

Unacceptable behaviour may occur face to face, through email or messaging, on social media, during travel, at work-related events, in a learner's home, in community provision or through third parties.

Examples may include:

- offensive or derogatory comments, jokes or images;
- unwanted sexual comments, conduct, messages or touching;
- repeated humiliation, intimidation or deliberate exclusion;
- hostile or degrading conduct related to a protected characteristic;
- unwanted conduct through social media, email or messaging;
- retaliation against someone for raising or supporting a discrimination or harassment concern; and
- harassment by a learner, parent/carer, commissioner, supplier or other third party.

17. Preventing Sexual Harassment

Thrive Lincs recognises that employers must take proactive steps rather than relying only on complaints after an incident occurs.

Thrive Lincs will take reasonable preventative measures and will prepare for the strengthened 'all reasonable steps' duty due to take effect on 30 October 2026. Measures will be proportionate to the organisation and risks and may include:

- maintaining clear standards and reporting routes;
- periodically assessing sexual-harassment risks, including lone working, home visits, community delivery, online communication, work events and contact with third parties;
- providing appropriate staff and manager training;
- responding promptly to warning signs and reported incidents;
- considering risks created by learners, parents/carers, contractors, commissioners or other third parties;
- ensuring staff know they can report concerns without victimisation;
- reviewing incidents and near misses for learning; and
- monitoring whether preventative measures remain effective.

Where third-party behaviour presents a risk, Thrive Lincs will consider proportionate steps such as boundaries on contact, alternative staffing or venues, commissioner involvement, risk assessment, safeguarding action or ending unsafe contact where appropriate.

18. Safeguarding and Equality

Equality and safeguarding responsibilities must be considered together. Discriminatory bullying, sexual harassment, harmful sexual behaviour, hate incidents, exploitation or abuse may constitute safeguarding concerns.

Where an equality-related concern indicates that a child may be at risk of harm, it must be reported immediately through Thrive Lincs' safeguarding procedures. The complaints, grievance or disciplinary process must not delay necessary safeguarding action.

Staff must avoid assumptions based on protected characteristics when assessing safeguarding risk.

19. Raising Concerns

Employees and workers are encouraged to raise discrimination, harassment, bullying, victimisation or equality concerns promptly. Concerns may be raised with a line manager, the Director or another appropriate manager where the concern involves the usual reporting person.

Formal employment concerns may be raised through the Grievance Procedure. Conduct concerns may be managed through disciplinary or other relevant procedures.



Where a disclosure concerning sexual harassment meets the legal requirements for whistleblowing protection, the Employment Rights Act 2025 has expressly strengthened protection for such disclosures from 6 April 2026.

No person should be subjected to retaliation or victimisation for raising a genuine concern, giving evidence or supporting another person in good faith.

20. Learner, Parent/Carer and Stakeholder Concerns

Learners, parents/carers, commissioners and other service users may raise equality concerns through Thrive Lincs' Compliments and Complaints Policy and Procedure.

Where the concern relates to safeguarding, it will be managed through safeguarding procedures. Where it primarily concerns a commissioning school or local authority decision, Thrive Lincs will explain the appropriate route and cooperate with the commissioner where required.

21. Responding to Concerns and Breaches

Concerns will be considered fairly, promptly and proportionately. The response will depend on the nature of the allegation, the people involved and whether safeguarding, employment, contractual or criminal procedures apply.

Serious discrimination, harassment, sexual harassment, bullying or victimisation by staff may constitute misconduct or gross misconduct and may lead to disciplinary action up to and including dismissal, subject to a fair process.

Contractors, volunteers or other representatives may have access withdrawn or contractual arrangements ended where appropriate. Learner behaviour will be addressed through safeguarding and behaviour procedures in a way that considers SEND, age, vulnerability and educational needs.

Police, LADO, DBS, professional bodies, commissioners or other agencies will be contacted where the relevant threshold or legal requirement is met.

22. Confidentiality and Data Protection

Equality information can include sensitive personal data. Thrive Lincs will collect, use, store and share it only where there is a lawful purpose and in accordance with the Data Protection Policy.

Information about disability, health, gender reassignment, religion or belief, sexual orientation and other personal matters will be handled sensitively and access restricted appropriately.

Confidentiality cannot be guaranteed where information must be shared for safeguarding, legal, regulatory or fair-investigation reasons, but information will be limited to what is necessary.

23. Equality Monitoring

Where appropriate and lawful, Thrive Lincs may use equality information to identify potential barriers or disparities in areas such as recruitment, retention, training, progression, staff experience, complaints, grievances, disciplinary matters and access to services.

Monitoring information should be proportionate, securely handled and, where practicable, analysed in a way that reduces unnecessary identification of individuals.

Small sample sizes will be treated carefully because statistical conclusions may be unreliable and disclosure risks may be greater.



24. Training and Awareness

Staff will receive equality, diversity and inclusion information or training appropriate to their role. Managers should understand their responsibilities relating to fair decision-making, reasonable adjustments, harassment prevention and responding to concerns.

Training will be refreshed where organisational learning, legal change, identified risk or staff responsibilities indicate that this is necessary.

25. Responsibilities

- The Director has overall responsibility for leadership, implementation and review of this policy.
- Managers are responsible for fair decision-making, inclusive practice, responding to concerns and considering reasonable adjustments.
- Those involved in recruitment must follow safer recruitment and equality requirements.
- The DSL and Deputy DSL are responsible for ensuring equality-related safeguarding concerns are managed through safeguarding procedures.
- All staff, workers, contractors and volunteers are expected to treat others with dignity and respect, comply with relevant requirements and report serious concerns.
- Learners will be supported to understand age-appropriate expectations concerning respect, discrimination, bullying and inclusion.

26. Related Policies

- Safer Recruitment Policy;
- Child Protection and Safeguarding Policy;
- Managing Safeguarding Concerns and Allegations About Staff Policy;
- Compliments and Complaints Policy and Procedure;
- Anti-Bullying Policy;
- Behaviour Policy;
- Staff Code of Conduct;
- Grievance Procedure;
- Disciplinary Policy;
- Whistleblowing Policy;
- Data Protection Policy;
- Health and Safety Policy; and
- ICT Acceptable Use Policy.

27. Monitoring and Review

The Director will monitor the effectiveness of this policy through complaints, grievances, safeguarding information, recruitment and employment data where appropriate, staff feedback, incidents and organisational learning.

This policy will be reviewed at least annually and sooner following a significant equality or harassment incident, relevant legal or guidance changes, changes to Thrive Lincs' services or workforce, or identified concerns about its effectiveness.

Because strengthened workplace harassment provisions are due to take effect on 30 October 2026, Thrive Lincs will review its harassment-prevention arrangements when the final supporting guidance and any applicable regulations are available rather than waiting until the next annual policy review.



28. Contact

Questions or concerns about this policy should be directed to Thrive Lincs Ltd.

Email: office@thrivelincs.co.uk

Telephone: 01522 456867