

# EQUALITY, DIVERSITY AND INCLUSION POLICY



Policy group: Equality and Diversity

Effective: July 2025

Approved: The Board

Responsible officer: Rachel Butt, Chief Learning Officer

Next renewal date: July 2026

Ref no.: 3.1



# GUIDANCE

## Vision

Transform lives through learning

## Values



**PASSIONATE** - We are passionate about inspiring young people, adults and our Purple People to be their best and we take pride in creating a positive learning environment to fulfil their potential.



**UNSTOPPABLE** - We are unstoppable in our quest for the pursuit of excellence. We are dedicated and resilient to develop ourselves and our learners.



**RIGHT** - We treat each other with respect and strive to do the right thing through insight, inclusion, honesty, growth and trustworthiness.



**PARTNERSHIPS** - We support the people surrounding us in our everyday lives, building effective partnerships with businesses, learners and all stakeholders where we can pass on our knowledge and skills to help them meet their goals.



**LEARNERS** - Learners are at the centre of everything we do and we are driven to provide life-changing and life-long learning for them.



**EMPOWERED** - We encourage our Purple People to be independent and autonomous to maximise their goals surpassing their barriers and targets. Feel it, believe it, live it.

## Tone of voice

Our tone of voice takes its direct influence from our core values. We are passionate about people and learners and are driven to get the best out of everyone by understanding them. We are caring and supportive, as well as being determined and striving for growth. We talk with purpose and enthusiasm in a way that connects and empowers people.

Innovation is at the heart of Learning Curve Group and we're always thinking about what's next!

## SUMMARY OF CHANGES

Date	Page	Details of amendments
23 March 2019	All	New format bringing in a positive approach to language
20 October 2020	All	Reflective of new acquisitions
2 July 2021	All	Annual review to ensure it meets external stakeholder requirements
19 July 2022	All	Integration review
27 July 2023	All	Annual review
19 July 2024	All	Annual review
9 July 2025	All	Annual review

## INTRODUCTION

Learning Curve Group (LCG) is one of the largest national education and training providers in the UK. All companies within the LCG family uphold the same company vision, mission and Core Values and follow our group policies and procedures.

LCG is committed to encouraging equality, diversity and inclusion and eliminating unlawful discrimination. The aim is for our workforce to be truly representative of all sections of society. We are also committed to fighting unlawful discrimination against our colleagues, learners, employers or subcontractors. This Policy helps us to put this commitment into practice. By complying with this Policy, you are helping to ensure that we create a work environment free from discrimination, where everyone can achieve their potential.

Striving to ensure that the work environment is free from harassment and bullying, and that everyone is treated with dignity and respect, is an important aspect of ensuring equal opportunities and diversity and inclusion in employment. We have a separate Anti-Bullying and Harassment Policy to help us achieve this environment.

This Policy is approved by the Board and Senior Leaders and covers all areas of the business, which includes, but is not limited to, the Department for Education (DfE) government-funded provision of devolved funding for education. Actions are embedded into the Equality and Diversity Development Plan and Quality Improvement Plans.

The Policy will be monitored and reviewed at least annually and updated accordingly to ensure alignment with any legislative changes and approval by the Board.

This Policy can be made available in alternative formats upon request.

All companies within the LCG family, as shown in the following table, uphold the same company vision, mission and core values and follow the group policies and procedures referenced in this document.

<b>Company</b>	<b>UKPRN</b>	<b>Registration number</b>
Learning Curve Group Limited	10008935	05233487
Profound Services Limited	10022358	05969610
Northern Care Training Limited	10013515	05256533
Acorn Training Consultants Limited	10000108	03182459
London Hairdressing Apprenticeship Academy Limited	10035171	07710651
Antrec Limited	10043333	07873541
APCYMRU LIMITED (MPCT)	10000311	04376890
PGL Training Limited	10008426	07287585

## Applies to

All.

## Reason for Policy

The overall purpose of this Policy is to abide by the Equality Act 2010 and ensure that LCG is a place where learning and work exist in an environment that promotes equality of opportunity, celebrates diversity and allows everyone to achieve their potential.

In alignment with the DfE strategies, LCG commits to advocating for stronger diversity policies, inclusive recruitment practices and increased representation of underrepresented groups, including the LGBTQIA+ and special educational needs and disability (SEND) communities. Annual reviews of internal policies will be conducted through an equality, diversity and inclusion lens.

This Policy will be communicated through various means to all employees, learners, subcontractors, stakeholders and prospective employees and is approved and reviewed by the Board at least annually.

Our commitment is:

- Every employee is entitled to a working environment which promotes dignity and respect for all. No form of intimidation, bullying or harassment will be tolerated.
- Every individual is entitled to receive a service from LCG and its subcontract partners that is free from bias and all unreasonable barriers.
- Employees, learners, customers and suppliers are entitled to expect equality of opportunity in all aspects of their employment, training and engagement with us, including its terms and conditions.
- Potential employees and learners are entitled to expect the recruitment process to be free from all unreasonable barriers.
- Learners will be supported in their learning to allow them to succeed in line with peers and progression to new opportunities.
- Employees will be provided training and development opportunities to support their understanding and commitment to the Policy.
- Managers will be committed to monitoring progress towards targets set for the representation and performance of different groups.

This Policy does not form part of your terms and conditions of employment and can be changed at any time as we deem appropriate.

# POLICY

## Legislation

It is unlawful to discriminate directly or indirectly in recruitment or employment because of age; disability; sex; gender reassignment; pregnancy and maternity; race (which includes colour, nationality and ethnic or national origins); sexual orientation; religion or belief; or marriage and civil partnership. These are known as the 'protected characteristics'.

Please note, although the term 'gender reassignment' is specifically protected in the Equality Act 2010, it is worth noting that this covers anyone who is "proposing to undergo, is undergoing or has undergone a process (or part of a process) for the purpose of reassigning the person's sex by changing physiological or other attributes of sex." This means that surgery does not need to have taken place for a person's gender identity to be protected by the Act and, therefore, LCG's Equality, Diversity and Inclusion Policy.

Discrimination after employment may also be unlawful; for example, refusing to give a reference for a reason related to one of the protected characteristics.

It is unlawful for an employer to fail to make reasonable adjustments to its requirements, working practices or physical features of the workplace where these put a disabled job applicant or employee at a substantial disadvantage. Employers are also under a duty to take reasonable steps to provide equipment or technology to help with a disability.

When we are providing services, goods or facilities, you must not discriminate against or harass a member of the public. We are under a duty to make reasonable adjustments to overcome barriers to using services caused by disability, including the removal, adaptation or alteration of physical features. In addition, we need to think ahead and make reasonable adjustments to address any barriers that may impede disabled people from accessing a service.

The Company Values (found on page two of this Policy) will embed equality and diversity in their implementation.

We are committed to equipping learners to be responsible, respectful, active citizens who contribute positively to society and are prepared for life in modern Britain. We will teach learners how to protect themselves from radicalisation and extremist views.

Our learners will develop their understanding of fundamental British values, gaining a greater understanding and appreciation of diversity, celebrating what we have in common and promoting respect for the different protected characteristics as defined in law.

The fundamental British values are:

- democracy
- rule of law
- individual liberty
- mutual respect
- tolerance of different faiths and beliefs.

We will seek the views of our learners, customers, employees and stakeholders in relation to the implementation of the Policy and the effectiveness of the service we provide to them in line with the commitments we make.

## Complaints

Any external complaints regarding equality, diversity or inclusion will be dealt with through the complaints process.

## Equal opportunities in employment

We will strive to avoid unlawful discrimination in all aspects of employment, including recruitment, promotion, opportunities for training, pay and benefits, discipline and selection for redundancy.

We are committed to fostering an inclusive recruitment process that ensures fairness, accessibility and opportunity for all applicants, regardless of background or identity. Our approach includes:

- reviewing job descriptions and person specifications to identify and remove any unintentional bias, ensuring language is clear, inclusive and welcoming to a broad range of candidates
- promoting balanced representation on interview panels, drawing from a diverse pool of colleagues to reflect a range of perspectives and experiences, and ensuring the panel is trained appropriately to conduct fair interviews
- advertising roles through inclusive and accessible platforms, with a focus on reaching underrepresented groups and communities.

We recognise that inclusion is an ongoing journey and are committed to continuous improvement in our recruitment practices to ensure everyone feels encouraged and supported to apply.

Person and job specifications will be limited to those requirements that are necessary for the effective performance of the job. Candidates for employment or promotion will be assessed objectively against the job requirements, taking into account any reasonable adjustments that may be required for disabled candidates. Disability and personal or home commitments will not form the basis of employment decisions, except where necessary.

We will consider any possible indirect discriminatory effect of our working practices, including the number of hours to be worked, the times at which these are to be worked and the place at which work is to be done. We will refuse requests for variations to working practices only if we have good reasons for doing so that are unrelated to any protected characteristic. We will comply with our obligations in relation to statutory requests for contract variations and will also make reasonable adjustments to our working practices for disabled individuals.

We will monitor the ethnic, sex and age composition of the existing workforce and of applicants for jobs (including promotion), as well as the number of disabled individuals within these groups. We will consider and take any appropriate action to address any problems that may be identified because of the monitoring process.

## Bullying and harassment

We have a separate Anti-Bullying and Harassment Policy and a separate Learner Behaviour Policy that set out our commitment to create an environment free from harassment and bullying, and the processes we have in place to support that.

## Customers, suppliers and other people outside our workforce

We will not discriminate unlawfully against customers using or seeking to use goods, facilities or services provided by us.

If you are subjected to any bullying or harassment by customers, suppliers, visitors or any other person you encounter through your work, you should report it to your manager (or, if you prefer, the People Team), who will take appropriate action.

## Reasonable adjustments

Failure to make reasonable adjustments is where a physical feature, provision, criterion or practice puts a disabled individual at a substantial disadvantage compared to someone who is not disabled, and the employer fails to make reasonable adjustments to enable the disabled individual to overcome the disadvantage.

## Training

We provide training in equal opportunities, diversity, and inclusion to all our colleagues. Additional training will be given to address the steps that decision-makers can take to avoid unconscious bias.

We provide training to all existing and new employees and others engaged to work for us to help them understand their rights and responsibilities under the Anti-Bullying and Harassment Policy, as well as what they can do to help create a working environment free of bullying and harassment. We will provide additional training for managers to enable them to deal more effectively with complaints of bullying and harassment.

## Your responsibilities

You need to play your part in helping us create a work environment that is free from harassment and bullying, where everyone can achieve their potential.

Acts of discrimination, harassment, bullying or victimisation against employees or customers are disciplinary offences and will be dealt with under our Disciplinary Procedure. We treat this type of conduct extremely seriously, and it may lead to dismissal without notice.

## Grievances

We encourage anyone who believes that they have been harassed or victimised to come forward and share their experiences and concerns with us. To facilitate this, we have robust procedures designed to assist our people to have open conversations, engage in dispute resolution and, where appropriate, implement a disciplinary process.

If you think you have been discriminated against directly or indirectly, bullied or harassed, you can raise this under our Grievance Procedure.

We take any complaint seriously, and you will not be penalised for raising a grievance, even if your grievance is not upheld, unless in the very unlikely situation that your complaint is both untrue and made in bad faith.

Objectives of the Policy are to:

- regularly report to the Board and Senior Team on equality and diversity matters, as well as the performance and participation of different groups of learners
- regularly review the Policy and procedures that promote and protect equality and diversity
- make all subcontract partners aware of their personal obligations to avoid discrimination, in accordance with the Policy
- organise or access opportunities that foster a culture of equality for all
- monitor procedures and activities to ensure the effectiveness of LCG's approach
- consider the needs of all, particularly those with protected characteristics
- take positive action to redress unjustified disparities in training and employment.

## Statutory Acts

The Equality Act 2010 was established to harmonise and envelope previous UK legislation relating to equality and diversity. This includes:

- the Equal Pay Act 1970
- the Sex Discrimination Act 1975
- the Race Relations Act 1976
- the Disability Discrimination Act 1995
- the Employment Equality (Religion or Belief) Regulations 2003
- the Employment Equality (Sexual Orientation) Regulations 2003
- the Employment Equality (Age) Regulations 2006.

## Implementation

Under the law, the Board carries the ultimate responsibility for ensuring that LCG meets the requirements of equality legislation. The authority for this is delegated to the CEO, who, in turn, has designated the Director of Excellence to take the strategic lead for championing equality, diversity and inclusion. This role is shared with the Chief People Officer regarding LCG as an employer. However, all colleagues have the responsibility to uphold the Policy, comply with the law and support LCG in fulfilling its duties and commitments.

## SEND inclusion

LCG will continue to strengthen its support for learners with special educational needs and disability (SEND) by committing to supporting learners with SEND through tailored support mechanisms and inclusive teaching practices. Employees will receive training to better support learners with SEND.

## Equal opportunities statement

LCG is committed to being an equal opportunities employer and training provider, promoting and developing equality, diversity and inclusion for staff, customers and suppliers across all our services.

It will seek to do this by:

- communicating our commitment to equality and diversity to all
- creating an environment where there is mutual respect and equality of opportunity
- providing relevant training for all staff and subcontract partners
- implementing mechanisms for implementation, monitoring, evaluation and review of what we do to promote and embed equality, diversity and inclusion
- treating acts of discrimination as a disciplinary offence, dealing with harassment and bullying in a timely and effective manner
- engaging staff, learners and stakeholders in the development, implementation and execution of our policies
- ensuring our subcontract partners promote equality and diversity in line with legal requirements.

All employees, suppliers, learners and customers will receive equal treatment, regardless of sex, marriage or civil partnership, race, disability, age, sexual orientation, gender reassignment, pregnancy and maternity, and religion or belief.

The Directors and Management Team recognise that they have a responsibility for ensuring that the company operates within the legal framework for equality and for implementing the Policy throughout the business. All employees and learners of LCG are responsible for trying to prevent discrimination that is within their control to prevent or challenge.

A handwritten signature in black ink, appearing to read 'Rachel Butt', with a long horizontal line extending to the right.

Signed:

Rachel Butt  
Chief Learning Officer

## DEFINITIONS

### **Direct discrimination**

Direct discrimination is where a person is treated less favourably than another because of a protected characteristic; for example, refusing to employ an individual because they are pregnant.

In very limited circumstances, employers can directly discriminate against an individual for a reason related to any of the protected characteristics where there is an occupational requirement. The occupational requirement must be crucial to the post and a proportionate means of achieving a legitimate aim.

### **Indirect discrimination**

Indirect discrimination is where a discriminatory provision, criterion or practice is applied in relation to individuals who have a relevant protected characteristic, compared with people who do not, and cannot be shown to be a proportionate means of achieving a legitimate aim. For example, requiring employees to have held a driving licence for ten years may be indirect age discrimination, unless that requirement could be objectively justified.

### **Discrimination by association**

Associative discrimination is where an individual is directly discriminated against or harassed for association with another individual who has a protected characteristic.

Please note, discrimination by association does not apply to the protected characteristics of marriage and civil partnership, and pregnancy and maternity. These are covered by direct discrimination, indirect discrimination and victimisation provisions in the Equality Act 2010.

### **Discrimination by perception**

Perceptive discrimination is where an individual is directly discriminated against or harassed based on a perception that they have a particular protected characteristic when they do not, in fact, have that protected characteristic.

Please note, discrimination by perception does not apply to the protected characteristics of marriage and civil partnership, and pregnancy and maternity. These are covered by direct discrimination, indirect discrimination and victimisation provisions in the Equality Act 2010.

### **Harassment**

Harassment is unwanted conduct related to one of the protected characteristics that has the purpose or effect of violating a person's dignity; or is reasonably considered by that person to create an intimidating, hostile, degrading, humiliating or offensive environment. It does not matter whether this effect was intended by the person responsible for the conduct.

Please note, harassment does not apply to the protected characteristics of marriage and civil partnership, and pregnancy and maternity. These are covered by direct discrimination, indirect discrimination and victimisation provisions in the Equality Act 2010.

### **Bullying**

Bullying is not a natural behaviour and should not be seen as such. It is typically when someone uses superior strength or influence to intimidate.

It is possible that someone may not know that their behaviour is bullying; however, it can still be bullying even if this person does not realise or intend to bully someone.

### **Victimisation**

Victimisation occurs where an employee is subjected to a detriment (where the employee is treated badly), such as being denied a training opportunity or a promotion because they made or supported a complaint or raised a grievance under the Equality Act 2010, or because they are suspected of doing so. An example could be a blind employee raising a grievance that their employer is not complying with its duty to make reasonable adjustments and then being systematically excluded from all meetings. However, an employee is not protected from victimisation if they acted maliciously or made or supported an untrue complaint in bad faith.

All matters of discrimination, bullying and harassment will be dealt with effectively and efficiently, using the following processes where applicable:

- the Complaints Procedure
- the Grievance Procedure
- the Staff Disciplinary Policy
- the Learner Behaviour Policy
- the Anti-Bullying and Harassment Policy.

## RELATED POLICIES AND LINKS

### **Group 1: People**

- 1.1 Disciplinary Policy
- 1.2 Absence Policy
- 1.3 Grievance Policy
- 1.4 Anti-Bullying and Harassment Policy
- 1.5 Whistleblowing Policy
- 1.8 Recruitment Policy
- 1.17 Hormonal Health Policy
- 1.8 Recruitment Policy

### **Group 4: Quality and Support**

- 4.8 Complaints Policy and Procedure

### **Group 8: Curriculum**

- 8.7 Learner Behaviour Policy

Code of Ethics and Conduct

Learner Handbook and Enrolment Processes

Equality Act 2010: [Equality Act 2010 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/2010/15)