



Equality, Diversity and Inclusion Policy

Last Reviewed: October 2025

Next Review Due: October 2026

Reviewed by: Georgina Broster, Head of Quality

Equality, Diversity and Inclusion Policy

1. Policy Statement

Learndirect Group is fully committed to promoting equality, diversity and inclusion (EDI) in all aspects of our work — as an employer, training provider and partner organisation.

We believe that every individual has the right to be treated with dignity, fairness and respect, free from discrimination, harassment or victimisation. We celebrate diversity as a strength and strive to ensure that our environment is inclusive and accessible to all.

As part of their responsibilities under the Equality Act 2010, Learndirect Group has a duty to promote equality of opportunity, as well as tackle unlawful discrimination (whether direct or indirect) and victimisation.

Learndirect Group will treat all employees, learners, service users, contractors and job applicants fairly and equally, regardless of their age, disability, race, religion and belief, gender and sexual orientation. Under the Equality Act 2010 we will ensure that the following characteristics are protected:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual Orientation

This policy sets out Learndirect's approach to eliminating unlawful discrimination, advancing equality of opportunity and fostering good relations among all staff, learners, employers and stakeholders.

2. Scope

This policy applies to:

- All Learndirect employees, contractors, and volunteers
- All learners, regardless of programme or level
- Employers and partners associated with Learndirect Group

It covers all aspects of employment, training, recruitment, teaching, assessment, progression, and service delivery.

3. Legal Framework

This policy operates within the framework of the following legislation:

- Equality Act 2010 (including the Public Sector Equality Duty)
- Human Rights Act 1998
- Data Protection Act 2018 and UK GDPR
- Rehabilitation of Offenders Act 1974
- Employment Rights Act 1996
- Health and Safety at Work Act 1974

Protected characteristics under the Equality Act 2010 include age, disability (including hidden disabilities and neurodivergence), gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

4. Our Commitments

Learndirect will:

- Eliminate discrimination and unlawful behaviour in all activities.
- Advance equality of opportunity for all individuals by removing barriers to participation, learning and employment.
- Foster an inclusive culture where diversity is respected and valued.
- Ensure all recruitment, training and promotion decisions are based solely on merit, ability and organisational need.
- Provide reasonable adjustments to enable full participation for disabled staff and learners.
- Take proactive measures to prevent harassment, bullying or victimisation and respond swiftly and fairly to any complaints.
- Provide regular equality and diversity training to all staff and learners.
- Monitor and review data to ensure equality objectives are met.

5. Responsibilities

Senior Management Team (SMT), Director of Compliance and Head of Quality:

- Ensure implementation of this policy and compliance with the Equality Act 2010.
- Approve and monitor the annual EDI action plan and report on progress.

Managers, Heads of Faculty and Team Leaders:

- Promote equality and inclusion within their areas of responsibility.
- Ensure all recruitment, training, assessment and decision-making processes are fair and objective.
- Take immediate action against discriminatory behaviour.

All Staff:

- Treat all learners, colleagues and partners with dignity and respect.
- Complete mandatory EDI training.
- Report any incidents of discrimination, harassment or bullying.

All employees have a responsibility to work to the policy in all areas of their work, individually and collectively. Employees must make sure they do not:

- Discriminate against anyone
- Persuade or pressure another employee to discriminate
- Harass, bully or abuse other employees or the public for any reason
- Condone harassment

If anyone witnesses a discriminatory incident at work, they have a duty of care to others to challenge such behaviour and practice. If an employee does not follow these and other requirements of this policy, it will be dealt with under the Disciplinary Procedure

Learners:

- Respect the rights and dignity of others.
- Participate in EDI training and activities, where applicable
- Report any concerns or incidents promptly through the appropriate procedure.

6. Harassment, Bullying and Victimisation

Learndirect Group has zero tolerance for any form of harassment, bullying or victimisation.

Harassment is unwanted conduct related to a protected characteristic that violates a

person's dignity or creates a hostile environment.

Bullying is repeated, unreasonable behaviour that intimidates or humiliates another person.

Victimisation occurs when someone is treated unfairly because they have made or supported a complaint.

Learndirect Group is committed to ensuring that no harassment or victimisation at work, whatever the motivation, is overlooked or condoned. Such behaviour can range from extreme forms such as violence or bullying to less obvious actions like practical jokes and ridiculing colleagues or subordinates.

Conduct becomes harassment if it persists after the recipient has made clear that it is regarded as offensive, although a single offensive act can amount to harassment. If it is so serious as to be obviously offensive towards the recipient.

Any form of harassment is a potential disciplinary matter and will be dealt with under the Learndirect Group disciplinary process and procedures

All allegations will be taken seriously and investigated confidentially in accordance with the Learndirect Group Grievance and Disciplinary procedures.

7. Recruitment and Selection

Learndirect Group will ensure fair and transparent recruitment by:

- Advertising roles widely and using inclusive language.
- Shortlisting and selecting candidates based on objective criteria related to job requirements.
- Offering reasonable adjustments throughout the recruitment process.
- Monitoring recruitment data to identify and address inequalities.

Applicants with spent convictions will not be unfairly disadvantaged in accordance with the Rehabilitation of Offenders Act 1974.

8. Training and Development

- All staff and learners will receive equality and diversity training during induction and through ongoing professional development. Training is available via the company's ATOM platform, 'Understand Organisational Cultures, Equality, Diversity and Inclusion'. All Learndirect Group employees should complete this training as part of our commitment to promoting equality and diversity in the workplace and eliminating discrimination as far as is reasonably practicable.

- Training opportunities will be accessible to all and tailored to individual needs where reasonable.
- Managers will ensure that career development and promotion decisions are based on skills, merit and potential, not protected characteristics.

9. Reasonable Adjustments and Accessibility

Learndirect Group will take all reasonable steps to remove barriers for disabled staff and learners, including:

- Adapting physical environments, learning materials or schedules.
- Providing assistive technology or specialist support.
- Reviewing adjustments regularly in consultation with the individual.

Where internal adjustments are not sufficient, Learndirect will seek external support from relevant agencies or professionals.

10. Confidentiality and Data Protection

- Personal or sensitive information, including disability or health details, will be handled in accordance with the Data Protection Act 2018 and UK GDPR.
- Information will only be shared with relevant personnel with the individual's explicit consent.
- All staff and learners are required to respect confidentiality and handle personal data appropriately.

11. Complaints and Grievances

Learndirect Group wants to promote a 'Speak Up' culture so that everyone has the confidence to tell someone in authority if they feel that they have been unfairly treated and have the confidence that they will be listened to, and their complaints dealt with properly.

We have a Confidential Hotline 'speak up' to enable all staff to have the ability to raise in confidence an issue or concern. All complaints will be dealt with seriously, promptly, and confidentially. All complaints are to be recorded and the details reported accurately in accordance with extant policy, and the outcome of any procedure must remedy the situation.

The Learndirect Group Confidential Hotline 'speak up' contact number is 01202 138789, or email: confidential@learndirect.com.

Informal Stage:

- Concerns should be raised promptly with a line manager, tutor or designated EDI Officer.

- Where possible, issues will be resolved informally within five working days.

Formal Stage:

- Formal complaints must be made in writing to Senior Management or HR.
- An impartial investigation will be carried out within ten working days.
- All parties will have the opportunity to provide evidence or statements.
- Findings and resolutions will be communicated in writing.
- Records will be kept securely and confidentially.

Learners and staff who raise complaints in good faith will be protected from victimisation.

If a resolution cannot be reached internally, Learndirect may refer the matter for independent mediation or external advice (e.g., ACAS or Equality Advisory Support Service).

12. Monitoring and Review

Learndirect will:

- Collect and analyse equality data (e.g., recruitment, participation, outcomes).
- Review complaints and feedback to identify trends or areas for improvement.
- Publish an annual Equality and Diversity Report summarising progress and key actions.
- Review this policy annually or sooner if required by changes in legislation or organisational structure.

We will ensure effective implementation of this policy by:

- Active promotion
- Circulating it to all colleagues, job applicants, contractors, and volunteers, as well as placing it on the organisation's internal shared drive and the internet
- Consulting regularly and providing appropriate training and guidance, particularly to line managers, to make sure that they understand this policy and their legal responsibilities
- Taking appropriate action to deal with any breach of this policy
- Monitoring statistics to identify inequality and/or under-representation.

13. Supporting Organisations

Equality and Human Rights Commission

Tel: 0808 800 0082 | www.equalityhumanrights.com

Equality Advisory Support Service (EASS)

Tel: 0808 800 0082 | www.equalityadvisoryservice.com

ACAS (Advisory, Conciliation and Arbitration Service)

Tel: 0300 123 1100 | www.acas.org.uk

14. Review and Accountability

This policy will be reviewed annually by the Equality and Diversity Lead (Group Chief People Officer), and Head of Quality and approved by the Senior Management Team.

Policy effectiveness will be evaluated through staff and learner feedback, monitoring data, and compliance audits.

Continuous improvement actions will be incorporated into the Learndirect Group EDI Action Plan.