SEN Unity
Sports, Education & Nada (musical sound)

Gender Equality Plan (GEP)

November 2026

SEN Unity CIC

Community Interest Company — Registered in England & Wales

GENDER EQUALITY PLAN (GEP)

FINAL VERSION 1.1 — November 2026

Reviewed and updated against UK legislation current as at November 2026

Overall responsibility: A. Merchant, Director

Small-organisation (proportionate) version

Supersedes: Gender Equality Plan, August 2026

Approved: November 2026

Next review: November 2027

Document control

Field	Detail
Title	Gender Equality Plan (GEP) - Final v1.1
Organisation	SEN Unity CIC (small Community Interest Company)
Version	1.1 (November 2026) - small-organisation proportionate version
Supersedes	Gender Equality Plan, August 2026 (withdrawn on approval of this version)
Overall responsibility	A. Merchant, Director (no separate champion or lead post — see Section 5)
Review cycle	Annual; or earlier on any material change in equality, employment or SEND law
Next review	November 2027
Note	Section 7 (Pay, Reward and Working Conditions) is intentionally excluded from this plan; pay, reward, flexible working and family-leave matters are covered in the organisation's separate HR/employment policies. Statutory duties still apply and are met through those policies.
Related policies	Equality, Diversity & Inclusion; Anti-Harassment & Bullying; Safeguarding (Children & Adults); HR / Employment (pay, flexible working, family leave); SEND Policy

1. Purpose and Commitment

SEN Unity CIC is committed to promoting gender equality, eliminating discrimination, and fostering an inclusive environment in which people of all genders have equal rights, responsibilities and opportunities.

This plan aligns with: the Equality Act 2010 (as amended by the Worker Protection (Amendment of Equality Act 2010) Act 2023 and the Employment Rights Act 2025); the Human Rights Act 1998; EHRC statutory codes and ACAS guidance; CIC Regulator good-governance principles; and the SEND Code of Practice: 0 to 25 (2015, updated September 2024).

Gender equality is integral to SEN Unity CIC's mission of supporting individuals, families, and communities affected by Special Educational Needs and disabilities (SEND).

1.1 Legal framework current as at November 2026

This version reflects law and guidance current as at November 2026. The most significant recent change: since 26 October 2024 every employer — regardless of size — must take steps to prevent sexual harassment of staff (s.40A Equality Act 2010), and from 30 October 2026 this duty was strengthened to "all reasonable steps", including liability for harassment of staff by third parties (parents, carers, visitors). These duties apply to small organisations too and are addressed in Section 8.

Duties that apply only to larger employers (e.g., mandatory gender pay-gap reporting and mandatory Equality Action Plans, which apply from 2027 to employers with 250+ employees) do not currently bind SEN Unity CIC; where this plan references them it is as voluntary good practice.

Public Sector Equality Duty (PSED): a CIC is not automatically subject to the PSED, but where SEN Unity CIC exercises public functions (commissioned local-authority, NHS or ICS work), we apply the PSED's three "due regard" aims to those functions.

1.2 Small-organisation approach

As a very small organisation, this plan sets out proportionate, low-burden measures. The Director (A. Merchant) coordinates implementation directly; there is no dedicated equality post. Monitoring and training are kept simple and proportionate (e.g., online training, a single short annual review). Statutory minimums — especially around harassment prevention and safeguarding — are never scaled below the legal requirement.

2. Scope

Applies to: directors, employees, workers, zero-hours and part-time staff; volunteers; freelancers, contractors and associates; job applicants; service users (children, young people and adults with SEND) and their parents/carers; partners and

suppliers; and third parties who interact with our staff (parents, carers, visitors, donors, members of the public), because employers are now liable for harassment of staff by third parties. Covers all functions, sites, events, home visits and online/remote activity.

3. Definitions

- Gender Equality: equal rights, responsibilities and opportunities for all genders — women, men, non-binary and gender-diverse people.
- Gender Discrimination: unfair treatment based on sex, gender reassignment, gender identity or expression, prohibited by the Equality Act 2010.
- Intersectionality: gender inequality compounded by disability, race, ethnicity, age, religion/belief, sexual orientation, pregnancy/maternity, or marriage/civil partnership. Girls and women with SEND, Black and minoritised women, and women carers are particular priorities.
- Sexual harassment: unwanted conduct of a sexual nature, or related to sex/gender reassignment, violating dignity or creating a hostile environment (EqA 2010 s.26).
- Third party: anyone not an employee/worker of SEN Unity CIC — parents, carers, service users, contractors, visitors, donors.
- "All reasonable steps": the standard, from 30 October 2026, for preventing sexual harassment — a written policy alone is insufficient; risk assessment, action, training and monitoring must be evidenced (proportionate to a small organisation).
- Perimenopause / menopause / post-menopause: typically women aged 45–55, but also younger women (e.g. after cancer treatment) and some trans/non-binary people; in individual cases symptoms may amount to a disability, triggering the reasonable-adjustments duty. (Menopause support is operated through our HR policy.)

4. Core Principles

- Zero tolerance of gender-based discrimination, harassment (including sexual and third-party harassment), or victimisation.
- Fair access to opportunities, pay, progression and leadership.
- Recognition of caring responsibilities and a presumption in favour of flexible working (operated through our HR policy).
- Inclusive language, policies and practices.
- Meaningful participation of all genders in decision-making.
- Proactive, anticipatory harassment prevention — action before incidents, not only after them.
- Support for women's health at work (pregnancy, maternity, menopause, menstrual health) through our HR policies and reasonable adjustments.

5. Governance and Leadership

5.1 Overall responsibility

- Overall responsibility for this Gender Equality Plan rests with **A. Merchant, Director**.
- Given the organisation's small size, there is no separate Board champion or dedicated Equality Lead post; the Director coordinates implementation, monitoring and reporting directly, with support from other directors as needed.
- The Director reports annually to fellow directors on progress and brings any material issue (including any harassment or discrimination finding) to fellow directors promptly.

5.2 Decision-making and accountability

- SEN Unity CIC will strive for gender balance in its leadership roles.
- Recruitment and appointment processes are transparent, fair and based on merit; where possible, more than one person is involved in recruitment decisions to reduce bias.
- Diverse lived experience, including gender-diverse perspectives, is valued.
- Gender equality is a standing consideration in strategic planning, commissioning decisions and risk registers.
- Staff and volunteers are consulted at least annually (informally, proportionate to our size); where staff are trade-union represented, we inform and consult collectively on changes to this policy. Service users and parent/carer views are sought through our usual engagement channels.

6. Recruitment, Retention, and Progression

- Use inclusive, gender-neutral language in role descriptions and recruitment materials.
- Advertise roles as flexible (part-time, job-share, remote/hybrid) wherever the work allows.
- Advertise widely to reach underrepresented genders; use standardised questions and scoring; avoid asking for previous salary history.
- Offer reasonable adjustments proactively to disabled and neurodivergent candidates at every stage.
- Monitor recruitment, retention and progression informally by gender where data is volunteered, and use findings to improve.
- Support progression into leadership roles regardless of gender; provide a return-to-work conversation (including flexible-working options) for anyone returning from maternity, adoption, shared-parental or neonatal leave (details in our HR policy).

Note on pay, reward and working conditions: these matters are intentionally covered by SEN Unity CIC's separate HR/employment policies (equal pay, flexible working, maternity/paternity/adoption/shared-parental/neonatal/carer's leave, redundancy protection, and menopause/menstrual-health support). Statutory duties in these areas continue to apply and are met through those policies.

7. Training and Capacity Building

- At induction and annually thereafter: equality, diversity and inclusion (EDI) awareness training covering all protected characteristics — delivered proportionately (e.g., online/free resources), with completion recorded by the Director.
- Mandatory harassment-prevention training (including sexual harassment, harassment related to sex and gender reassignment, and third-party harassment) for all staff, volunteers and directors — 100% completion, evidenced and logged. This is a legal requirement regardless of organisation size.
- Menopause/menstrual-health awareness and flexible-working/family-leave awareness are included in induction signposting to our HR policy.
- Raise awareness of gender bias, stereotypes and unconscious bias; embed safeguarding and dignity-at-work principles, with SEND-specific gender-awareness content (Section 9).
- Directors refresh their awareness at least every two years.

8. Culture, Safety, and Dignity (Prevention of Harassment)

SEN Unity CIC will maintain a safe, respectful, and inclusive culture. Gender-based harassment, bullying, or violence will not be tolerated. Clear reporting and complaint procedures are in place and accessible. Complaints are handled confidentially, fairly, and without retaliation.

8.1 The legal duty (applies to all employers, including small ones)

- Since 26 October 2024, every employer must take reasonable steps to prevent sexual harassment of employees — a proactive, anticipatory duty (s.40A EqA 2010, inserted by the Worker Protection Act 2023).
- From 30 October 2026, the Employment Rights Act 2025 strengthened this to "all reasonable steps". For a small organisation this means, proportionately: a clear policy, risk assessment, training, accessible reporting, and follow-up — a policy alone is not enough.
- We are liable for harassment of our staff by third parties (parents, carers, service users, visitors, contractors) where we fail to take all reasonable steps or permit it.
- A tribunal may uplift compensation by up to 25% where the preventive duty is breached, and the EHRC may enforce directly without an individual claim.

8.2 Our programme (proportionate to a small organisation; EHRC eight steps — Appendix B)

- An effective anti-harassment policy naming unacceptable behaviours and explicitly covering third parties and online harassment.
- Staff/volunteer engagement — informal check-ins and an annual short survey/exit conversations; act on what we hear.
- A simple documented harassment risk assessment (Appendix C), reviewed at least annually and after any incident — focus on lone working, home visits, events, online sessions and any residential work.
- Multiple reporting routes, including reporting directly to A. Merchant (Director) and, where a concern involves the Director, to another named director/trustee; victimisation is prohibited.
- Prompt, fair handling of reports; support offered (time off, adjustments, external signposting); consistent outcomes.
- The Director logs reports, training completion and survey feedback and reviews them annually with fellow directors

8.3 SEND-specific third-party measures

- Staff are never required to tolerate abusive or sexualised behaviour from a client, family member or visitor "because of SEND". Where a service user's behaviour creates risk, a simple support/risk plan balances their rights and reasonable adjustments with staff safety.
- Lone-working and home-visit protocols include check-ins, pair working where risk is high, de-escalation awareness, and a clear right to withdraw; incidents are logged and reviewed by the Director.

9. Service Delivery and Community Engagement

- Services are accessible and responsive to people of all genders; we recognise gendered experiences within SEND and disability; we avoid reinforcing harmful stereotypes; we include women, men and gender-diverse voices in co-production where proportionate.

9.1 Girls and women with SEND

Girls and women are under-identified in several SEND categories (notably autism and ADHD), and women and girls with disabilities face compounded discrimination. Staff are trained to recognise gendered presentation of SEND; we review take-up and outcomes by sex informally where data allows, and ensure single-sex and personal-care arrangements respect dignity and privacy.

9.2 Parents and carers

Most unpaid carers of disabled children are women. Appointment times, venues (including breastfeeding-friendly and private spaces), and remote/hybrid participation

are designed with women carers in mind; we never disadvantage a parent who engages flexibly or remotely.

9.3 Trans and non-binary children, young people and staff

- Trans and gender-questioning children and young people — disproportionately neurodivergent (Cass Review, April 2024) — are supported in a safeguarding-led, evidence-based way. We follow DfE guidance principles: no irreversible social-transition steps without a recorded process involving parents/carers (unless safeguarding overrides) and relevant clinical advice; accurate records; single-sex facilities managed lawfully under EqA 2010 Schedule 3 exceptions.
- Trans and non-binary staff are protected under the gender-reassignment characteristic; our anti-harassment policy, facilities and records reflect this.
- Any child-safeguarding concern is escalated immediately under our Safeguarding (Children) Policy and referred to statutory authorities where appropriate; this plan does not override safeguarding duties.

10. Monitoring and Data Collection

- Proportionate, UK-GDPR-compliant collection of anonymised, gender-disaggregated data (voluntary self-identification where offered) on recruitment, staff profile, training completion, grievances/harassment reports, leavers, and — with consent/age-appropriately — service users.
- The Director reviews participation, outcomes and satisfaction by gender informally each year and uses findings to improve.
- A short annual equality note is reported to fellow directors. If SEN Unity CIC grows to 250+ employees, statutory gender pay-gap reporting and an Equality Action Plan will be introduced; until then these are voluntary.
- No individual is identifiable in any published report.

11. Communication and Transparency

- This Gender Equality Plan is publicly available (website).
- Progress is reviewed annually and reported to fellow directors; updates are communicated internally and, where appropriate, externally — including to funders as required.
- Harassment reporting routes (including the alternative route to another director/trustee) are communicated to all staff, volunteers and contractors, and accessibly to service users/parents.

12. Review and Continuous Improvement

- Annual review of objectives, actions and impact — next: November 2027, led by A. Merchant, Director.
- Update on organisational growth, learning, or legal change; trigger a review on any harassment/discrimination finding or off-track objective.

- Incorporate feedback from staff, volunteers, service users and partners (proportionate to our size).

13. Funding and Regulatory Alignment

13.1 National Lottery Community Fund

Demonstrates commitment to fairness, inclusion and tackling inequality; embeds EDI across governance, staffing and service delivery; ensures accessible, inclusive services responsive to community need; uses monitoring/feedback to improve outcomes and reduce disadvantages - supporting funding criteria on fairness, diversity, inclusion and good governance.

13.2 NHS, Integrated Care Systems (ICS), and Health-Related Funders

Complies with the Equality Act 2010 and, where exercising public functions under commission, the PSED in full; promotes equitable access; recognises the gender–disability–health intersection; supports staff via safe, inclusive, flexible working and strengthened harassment-prevention duties. Complements NHS priorities on health inequalities, workforce inclusion, safeguarding and person-centred care.

13.3 EU / Horizon Europe Gender Equality Plan Requirements

Meets core eligibility criteria: (a) Public document — directors -approved, publicly available; (b) Dedicated resources — overall responsibility held by A. Merchant, Director, with allocated time; (c) Data collection and monitoring — proportionate UK-GDPR-compliant gender-disaggregated data and annual Director review (Section 10); (d) Training and capacity building — mandatory EDI and harassment-prevention (including sexual and third-party harassment) training (Section 7). Addresses recommended thematic areas: work-life balance/flexible working (HR policy); gender balance in leadership (Section 5); recruitment/career progression (Section 6); organisational culture/prevention of gender-based harassment including proactive and third-party duties (Section 8).

14. Approval

Overall responsibility: A. Merchant, Director.

Approved by the Directors of SEN Unity CIC on: November 2026

Signed: A. Merchant, (Director)

Next review: November 2027 (or earlier on material legal change).

Appendix A — Legislative timeline 2023–2027 (England, as at Nov 2026)

Date	Change	Status
6 Apr 2024	Day-one flexible working; Carer's Leave (1 wk unpaid); redundancy protection extended to 18 months.	In force (via HR policy)
22 Feb / 26 Sep 2024	EHRC menopause guidance; EHRC updated sexual-harassment technical guidance + 8-step employer guide.	Current
12 Sep 2024	SEND Code of Practice: 0 to 25 updated; remains statutory framework in England.	Current
26 Oct 2024	s.40A EqA 2010 proactive duty to prevent sexual harassment; third-party harassment liability; up to 25% uplift; EHRC direct enforcement — applies to ALL employers.	In force
Apr 2024	Cass Review published; NHS England service changes follow.	Policy context
6 Apr 2025	Neonatal care leave and pay (up to 12 weeks).	In force (via HR policy)
Late 2025	First Paternity Leave (Bereavement) Act 2024 provisions commence.	Monitor
18 Dec 2025	Employment Rights Act 2025 receives Royal Assent.	Phased
6 Apr 2026	Voluntary Equality Action Plans (pay gap + menopause) encouraged; gov.uk guidance Mar/May 2026.	Voluntary (250+ only)
Feb 2026	DfE consultation on sex & gender in schools; SEND White Paper.	Monitor final
30 Oct 2026	Harassment duty strengthened to "all reasonable steps"; liability where employer "permits" third-party harassment — applies to ALL employers.	NOW IN FORCE
Expected Jan 2027	Six-month unfair-dismissal qualifying period; compensation cap removed (ERA 2025).	Monitor
Expected Apr 2027	Mandatory Equality Action Plans for 250+ employers with pay-gap reports.	Only if 250+ employees
~2028/29	SEND system reform legislation expected; 2015 Code remains in force.	Monitor

Appendix B — EHRC eight steps to prevent sexual harassment (proportionate for small orgs)

1. Effective anti-harassment policy

Name unacceptable behaviours (sexual, sex/gender-reassignment-related, online); cover third parties; state consequences; accessible to all.

2. Engage staff

Informal check-ins, short annual survey, exit conversations; act on findings.

3. Assess and reduce risk

Simple risk assessment of high-risk settings (lone working, home visits, events, social media, third-party contact); review after any incident.

4. Make reporting easy

Multiple routes incl. direct to Director and an alternative director/trustee if the concern involves the Director; no victimisation.

5. Train all staff

Induction + annual refresher (online acceptable); directors and volunteers included; completion logged.

6. Consistent, timely action

Prompt fair handling; victim's wishes central; support offered; outcomes recorded.

7. Support those affected

Time off, adjustments, external signposting (specialist harassment support).

8. Monitor, review, evidence

Log reports, training, survey feedback; annual review by Director with Board; demonstrate "all reasonable steps".

Appendix C — Simple harassment risk-assessment template (small organisation)

At least annually and after any incident. Score likelihood × impact (1–5); act on any score ≥6 or high impact.

Setting / activity	Third parties present	Risk (L×I)	Control measures	Review
Home visits (lone working)	Parent/carer, family, young people		Check-in protocol; pair working where high risk; de-escalation awareness; right to withdraw	
Centre / office / reception	Visitors, public		Panic alarm / mobile; two-person coverage where possible; de-escalation awareness	
Events / workshops	Attendees, parents, partners		Behaviour code communicated; named person on duty; no lone-working rotas	
Online / remote sessions & social media	Public, service users		Moderation/recording; reporting tools; no personal details shared; block policy	
Overnight / residential (if any)	Young people, providers		Single-sex accommodation policy; staffing ratios; safeguarding contact	
Volunteer placements	Host families / partners		Vetting & induction; regular check-ins; reporting access	

Appendix D — References and sources

- Equality Act 2010 (as amended) - legislation.gov.uk
- Worker Protection (Amendment of Equality Act 2010) Act 2023 — legislation.gov.uk/ukpga/2023/51
- Employment Rights Act 2025 — legislation.gov.uk/ukpga/2025/36
- ACAS: Sexual harassment; Employment Rights Act 2025 — acas.org.uk
- GOV.UK: New action to tackle harassment at work (29 Oct 2026); Gender pay gap reporting; Creating an action plan (May 2026); Menopause workplace adjustments (Mar 2026)
- EHRC: Sexual harassment at work — technical guidance (Sep 2024) + 8-step guide; Menopause guidance (Feb 2024) — equalityhumanrights.com
- Employment Relations (Flexible Working) Act 2023; Carer's Leave Act 2023; Neonatal Care (Leave and Pay) Act 2023; Protection from Redundancy (Pregnancy and Family Leave) Act 2023; Paternity Leave (Bereavement) Act 2024 — legislation.gov.uk (covered via HR policy)
- SEND Code of Practice: 0 to 25 (2015, updated Sep 2024); Children and Families Act 2014 — GOV.UK
- The Cass Review (Apr 2024); DfE: Sex and gender questions in schools (consulted early 2026) — GOV.UK
- CIPD / Lewis Silkin / King & Spalding employment-law updates 2025–2026 (commencement tracking).