SEN Unity
Sports, Education & Nada (musical sound)

SEN Unity CIC

Equality, Diversity, and Inclusion Policy

October 2026

SEN Unity

Equality, Diversity and Inclusion Policy

Version 2.0 — Updated October 2026
Next scheduled review: October 2027

Policy Owner	Directors, SEN Unity
Approved By	Directors
Date Approved	27 October 2026
Applies To	All staff, volunteers, directors, contractors, visitors, service users and partners

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1. Statement of Commitment

SEN Unity is committed to fostering equality, diversity and inclusion across all our activities and to eliminating all forms of unlawful discrimination. We aim to reflect on the communities we serve, ensure every person feels respected and valued, and enable everyone — staff, volunteers and service users — to contribute fully and achieve their potential.

As a SEND-focused organisation, we go further: we actively employ and support young people and adults with SEND, ensuring equal access to meaningful roles, professional development and progression pathways. We recognise that many people face multiple and overlapping disadvantages, and we design our services and workplace to meet people where they are.

This policy operates in full compliance with:

- Equality Act 2010
- Equality Act 2010 Code of Practice (in force 5 August 2026)
- Employment Rights Act 2025 (key provisions effective 30 October 2026)
- SEND Code of Practice and Ofsted inclusion frameworks
- Protection from Harassment Act 1997
- UK General Data Protection Regulation / Data Protection Act 2018

2. Purpose and Scope

This policy applies to all staff, directors, volunteers, contractors, visitors, service users and partner organisations. It covers all areas of our work — recruitment, employment, training, service design, service delivery and stakeholder engagement.

The purpose of this policy is to:

1. Guarantee fairness, respect and equal opportunity for everyone.
2. Prevent and address discrimination, harassment and victimisation.
3. Embed inclusive practice — especially for people with SEND — into every process.
4. Comply with statutory duties and prepare for inspection and funding assurance.
5. Set clear responsibilities and accessible ways to raise concerns.

3. Protected Characteristics

Under the Equality Act 2010, it is unlawful to discriminate against, harass or victimise anyone because of any of the following nine protected characteristics:

- Age
- Disability (including neurodivergence and long-term health conditions)
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race (including colour, nationality, and ethnic or national origin)
- Religion or belief (including lack of belief)
- Sex
- Sexual orientation

Note: Where SEN Unity receives public funding or exercises public functions, the Public Sector Equality Duty also applies, requiring us to have due regard to eliminating discrimination, advancing equality of opportunity and fostering good relations.

4. Key Definitions

A full glossary is provided in Appendix A. The following core definitions apply throughout this policy:

- **Direct discrimination:** treating someone less favourably than another in comparable circumstances because of a protected characteristic.
- **Indirect discrimination:** applying a provision, criterion or practice that disadvantages people sharing a protected characteristic, unless it is a proportionate means of achieving a legitimate aim.
- **Harassment:** unwanted conduct related to a protected characteristic that violates dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment.
- **Victimisation:** treating someone unfairly because they have made, or supported, an equality-related complaint or given evidence in one.
- **Reasonable adjustments:** practical changes to remove or reduce barriers facing disabled people — a proactive legal duty, not a discretionary favour.

5. Our Commitments

5.1 Equality in Employment and Service Delivery

We will not discriminate unlawfully in:

- recruitment, selection and appointment;
- pay, terms and conditions, and benefits;
- training, development, promotion and progression;
- flexible working, parental leave and career breaks;
- grievance, discipline, redundancy and dismissal;
- access to, and delivery of, all services and facilities.

All decisions will be based on merit, save where legitimate exceptions apply under the Equality Act 2010.

5.2 Reasonable Adjustments — Disability Equality

We will take reasonable steps to remove, reduce or adjust any physical, procedural or attitudinal barrier that places a disabled employee, volunteer or service user at a substantial disadvantage. Adjustments may include:

- physical access changes and adapted equipment;
- modified materials, communication formats or assessment processes;
- flexible hours, adjusted duties or additional support;
- reasonable adjustments in recruitment and interview processes.

Individual needs will be assessed confidentially, agreed in writing (see Appendix D) and reviewed regularly. Cost is not, by itself, a reason to refuse a reasonable adjustment.

5.3 Safe and Inclusive Culture

- We operate a zero-tolerance approach to bullying, harassment and victimisation.
- Third-party duty (from 30 October 2026): we will take reasonable steps to prevent customers, visitors or associates from harassing our staff, volunteers or service users.
- NDA restrictions: we will not use non-disclosure agreements to silence anyone about discrimination, harassment or protected disclosures, or to prevent a legal claim.
- Every individual is personally responsible for their conduct; SEN Unity may also be held vicariously liable for unlawful acts of its staff and agents.
- Sexual harassment may constitute both an employment matter and a criminal offence under the Sexual Offences Acts and the Protection from Harassment Act 1997.

5.4 Training and Awareness

- All staff and volunteers receive induction and annual refresher training covering the Equality Act 2010, the 2026 Code of Practice, reasonable adjustments and SEND-inclusive practice.

- Managers and directors receive additional training to handle complaints, lead inclusive teams and fulfil their responsibilities under this policy.
- Training records are maintained and reviewed annually.

5.5 Data Monitoring and Privacy

- We monitor the diversity profile of our workforce and service users to identify under-representation or disparity.
- Data is collected voluntarily, confidentially and separately from personnel or service records.
- All handling complies with UK GDPR; special category data (ethnicity, disability, etc.) is minimised, secured and used only for inclusion planning.
- Findings inform an annual action plan and are reviewed by the Directors.

5.6 SEND-Specific Commitments

- Our workforce and leadership reflect the diversity of the SEND community, including young people and adults with SEND.
- Services are co-designed with children, young people and families with SEND.
- Communications are accessible — plain English, easy-read formats and preferred communication methods.
- We align with the SEND Code of Practice and Ofsted's inclusion expectations, and prepare for inspection accordingly.

6. Raising Concerns and Procedures

- Concerns may be raised informally or formally via the Grievance Procedure (see Appendix C).
- All reports are acknowledged promptly, investigated fairly and confidentially, and addressed proportionately.
- Retaliation against anyone raising a concern is unlawful and will be treated as serious misconduct.
- Serious incidents, including sexual harassment, may constitute gross misconduct and result in dismissal without notice.
- Using internal procedures does not affect anyone's right to make a claim to an Employment Tribunal within three months of the alleged act. ACAS early conciliation is normally required before a claim can be lodged.

7. Governance, Monitoring and Review

- This policy is owned and approved by the Directors of SEN Unity.
- It will be reviewed annually, or sooner if legislation or statutory guidance changes.
- Effectiveness is measured through complaint data, staff and service-user feedback, inclusion action-plan progress and inspection outcomes.
- The next scheduled review is October 2027.

Appendix A — Glossary

Term	Definition
Equality Act 2010	Primary legislation consolidating UK anti-discrimination law; defines the nine protected characteristics.
Protected characteristic	One of nine personal attributes protected from discrimination under the Equality Act 2010.
Direct discrimination	Treating one person worse than another in comparable circumstances because of a protected characteristic.
Indirect discrimination	A neutral rule, policy or practice that disadvantages people sharing a protected characteristic — unless it is a proportionate means of achieving a legitimate aim.
Harassment	Unwanted conduct related to a protected characteristic that violates dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment.
Victimisation	Penalising or treating someone less favourably because they have made or supported an equality complaint, or given evidence in such a case.
Reasonable adjustment	A change or step taken to remove, reduce or prevent a substantial disadvantage faced by a disabled person; a proactive legal duty.
Disability	A physical or mental impairment with substantial and long-term (12+ months or lifelong) adverse effect on normal day-to-day activities — includes neurodivergence, long-term health conditions and menopause-related impacts meeting the statutory definition.
Gender reassignment	The process (or intention) to transition from one gender to another — full or partial, with or without medical treatment or a Gender Recognition Certificate.
Public Sector Equality Duty (PSED)	Applies where public functions are exercised or public funding received: duty to have due regard to eliminating discrimination, advancing equality of opportunity and fostering good relations.
SEND	Special Educational Needs and Disabilities — as defined in the Children and Families Act 2014; needs that call for special educational provision.
Ofsted	Office for Standards in Education, Children's Services and Skills — the inspectorate assessing quality and compliance in education and children's services.
UK GDPR	United Kingdom General Data Protection Regulation — sets standards for processing personal information,

	including sensitive “special category” data such as ethnicity and disability.
Code of Practice 2026	Statutory guidance effective 5 August 2026 — clarifies duties including menopause as disability, wording of monitoring questions and service-provision duties.
Third-party harassment	Harassment of staff by customers, visitors or other third parties; from 30 October 2026 employers must take reasonable steps to prevent it.
ACAS	Advisory, Conciliation and Arbitration Service — provides early conciliation before Employment Tribunal claims can be lodged.

Appendix B — Equality Monitoring Form

Completion is voluntary. This form is anonymous and confidential. Data is stored separately from personal files, aggregated only for inclusion planning, and handled in line with UK GDPR. Access is limited to the designated Equality Lead.

Question	Response (tick as applicable)
1. Age group	☐ Under 18 ☐ 18–24 ☐ 25–34 ☐ 35–44 ☐ 45–54 ☐ 55–64 ☐ 65+ ☐ Prefer not to say
2. Gender identity	☐ Female ☐ Male ☐ Non-binary ☐ Another identity: _____ ☐ Prefer not to say
3. Trans status	☐ Yes ☐ No ☐ Prefer not to say
4. Ethnicity	☐ White (British/Irish/Other) ☐ Mixed/Multiple ethnic groups ☐ Asian/Asian British ☐ Black/African/Caribbean/Black British ☐ Other ethnic group ☐ Prefer not to say
5. Religion or belief	☐ Christian ☐ Muslim ☐ Hindu ☐ Jewish ☐ Sikh ☐ Buddhist ☐ None ☐ Other: _____ ☐ Prefer not to say
6. Sexual orientation	☐ Heterosexual ☐ Gay/Lesbian ☐ Bisexual ☐ Other: _____ ☐ Prefer not to say
7. Disability / SEND	☐ Yes — please specify: _____ ☐ No ☐ Prefer not to say
8. Caring responsibilities	☐ Yes ☐ No ☐ Prefer not to say

Appendix C — Raising a Concern: Quick Reference

Route	What to do	Who to contact
Informal	Speak confidentially to raise a concern and seek early resolution.	Line Manager or Equality Lead
Formal	Submit a written grievance using the standard grievance form.	Directors / HR designee
Urgent / Immediate risk	Report immediately if someone is unsafe or at serious risk.	Any Director
External route	Employment Tribunal claim — within 3 months of the alleged act. ACAS early conciliation required first.	ACAS (www.acas.org.uk)
Confidential support	Independent staff support / counselling / employee assistance.	[Insert provider contact details]

Appendix D — Reasonable Adjustments Request Form

Confidential — seen only by the Equality Lead and those directly involved in implementing the adjustment.

Field	Details
Name	
Role / service-user status	
Nature of need or barrier faced	
Suggested adjustment(s)	
Agreed adjustment(s) and any alternatives	
Timescale for implementation	
Review date	
Agreed by (name and role)	
Date agreed	

Appendix E — Implementation and Action Plan

Priority action	Lead	Timeline	Status

Distribute policy to all staff, volunteers and partners	Directors	November 2026	☐
Deliver 2026 Code of Practice & third-party duty training	Equality Lead	December 2026	☐
Review recruitment and service materials for accessibility	Operations Lead	January 2027	☐
Collect first annual equality monitoring data	Equality Lead	April 2027	☐
Publish accessible (easy-read) summary of this policy	Communications Lead	May 2027	☐
Full policy review and refresh	Directors	October 2027	☐

Approved and signed on behalf of SEN Unity:

Signature: *A. Merchant*

Printed name: Mr. A. Merchant

Role: Director

Date: 27.10.2026