



EQUITABLE ACCESS AND INCLUSION POLICY

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1. Policy Outline

Striving towards a more equitable world is foundational to everything In Focus Education and Development stands for. A kinder world that encourages creativity, connection, community and joy is essential in the future we want to help build for young people: one where everyone, regardless of their background, life experience, and present reality, feels valued, respected, and free from disadvantages that cause so much hardship for so many.

This policy documents how we tackle this challenge at an organisational level, and is a collaborative effort, open to input from employees, trustees, applicants, volunteers and participants. As part of our ongoing commitment to grow and improve in this area, we have chosen to write our policy documents in plain English so they stay accessible to as many people as possible, and so they better reflect who we are as an organisation.

The Equality Act 2010 sets out specific Protected Characteristics that are legally protected against discrimination and abuse in England, Scotland, and Wales (see Appendix (a)). Our own organisational definitions of discrimination are covered in Section 4.

We believe the legally defined list of Protected Characteristics under the Equality Act 2010 is not exhaustive when it comes to how people can be discriminated against. Our policy additionally recognises **socio-economic background** and **caregiver status** as Protected Characteristics.

The Equality Act specifically names “gender reassignment” as a Protected Characteristic, but that falls short of the full picture of gender variance and how this can affect someone’s opportunities and challenges in life. This also overly medicalises gender experiences in a way that excludes many. This policy extends that protection to cover **gender identity and expression**, in its broadest sense.

This list is not fixed or final, and we welcome suggestions about characteristics that should be added, which we will use to review and update the policy accordingly. The full list of Protected Characteristics covered by this policy can be found in Appendix (a-b).

Our goal is a workplace culture where everyone can do their best work, free from discrimination, harassment, and victimisation. We want people to feel safe raising concerns, and we know that can only happen in an environment that prioritises transparency, clarity and trust.

2. Policy Remit

Our commitment to equitable access and inclusion extends to all aspects of our activities and working relationships, both as an employer, and as a service provider.

- a. Recruitment and selection procedures*
- b. Terms of employment, including pay, conditions and benefits*
- c. Training, appraisals, career development and promotion*
- d. Work practices, conduct, task allocation, disciplinary action and grievances*
- e. Work-related social events*

f. *Termination of employment and matters after termination, including references*

This policy provides a framework for our team and those who work with us to understand their responsibilities in working towards equitable access and inclusion. We are committed to keeping an open conversation about equal opportunities across the organisation and are actively experimenting with how we gather input and feedback from our stakeholders to make that as meaningful as possible.

The principles laid out in this policy towards equitable access and inclusion apply not just internally, but to how we treat visitors, clients, customers, suppliers, and former team members, and, equally, to the behaviour we expect from visitors in our spaces.

This policy sits alongside, and does not replace, the specific terms of any individual employment contract.

This policy is reviewed annually by our Office Administrator. We are still exploring the best ways to involve the whole team in that process. This year, a draft was shared with the team for review and comment, with a particular effort to include volunteers from our Youth Leadership programme. The latest version is published on our HR platform (Breathe) and on our website. Feedback and suggestions are always welcome - from anyone, at any point in the year.

3. Who is responsible?

Building an equitable and inclusive workplace is something we all share responsibility for. This policy applies to everyone involved with In Focus - regardless of seniority, tenure, or working hours. For the sake of brevity, we will refer to anyone that works in any capacity with In Focus as stakeholders.

The Chief Executive Officer of In Focus has overall responsibility for overseeing this policy, as well as equal opportunities and discrimination law compliance in the workplace. They are also responsible for day-to-day operational matters relating to this policy.

All stakeholders at In Focus Education and Development are expected to:

- g. *Treat all other members of the team with dignity and respect***
- h. *Not discriminate against or harass other members of the team***
- i. *Not discriminate against or harass any other internal or external stakeholders at In Focus, including any current or previous organisational contacts***

The Chief Executive Officer must take all necessary steps to:

- j. *Promote the objective of equitable opportunities and the values set out in this policy***
- k. *Ensure that their own behaviour and those of the Workforce they manage complies in full with this policy***
- l. *Ensure that any complaints of discrimination, victimisation or harassment (including against themselves) are dealt with appropriately and are not suppressed or disregarded***

Please refer to our [Whistleblowing Policy](#) for further information internal reporting and complaints.

4. Definitions of Discrimination

Discrimination is a broad term that covers a range of detrimental and unlawful actions that can be used against a person based on their protected characteristics.

Direct Discrimination

When a person is treated less favourably than others because of one or more Protected Characteristics. This includes stereotyping and generalisation.

For example, if an employer refuses to interview women for a professional driving role based on the assumption that 'women are bad drivers,' this would constitute direct discrimination.

Direct discrimination can happen even if the person has no protected characteristic but is perceived to have it or is connected to someone who does.

For example, this could be an individual experiencing Islamophobic discrimination because they have a spouse who is Muslim.

Indirect Discrimination

Indirect discrimination happens when a policy, practice, rule, or requirement (which applies to everyone equally) places someone with a particular protected characteristic at a disadvantage compared to others.

An example would be a requirement for job applicants to have ten years' experience in a particular role, since this will be harder for young people to satisfy. This kind of discrimination is unlawful unless the organisation can justifiably demonstrate that the rule or policy serves a legitimate aim and is behaving proportionately to reach that aim.

Victimisation

Victimisation happens when an individual is treated unfairly because they have made or supported a complaint about discrimination, or because they are suspected of doing so.

For example, if a shift manager begins to exclusively assign undesirable shifts to a specific worker because they suspect that person has made a discrimination complaint against them, this would be considered victimisation.

Harassment

Harassment in the workplace is unwanted conduct relating to a protected characteristic that violates a person's dignity, or creates an environment that feels intimidating, hostile, degrading, humiliating or offensive to the individual.

This includes:

- Conduct related to protected characteristics such as age, disability, gender history, race, religion or belief, sex, or sexual orientation
- Sexual harassment, which involves unwanted conduct of a sexual nature with the same purpose or effect
- Less favourable treatment because an individual rejected or was subjected to sexual harassment

Harassment can occur even if an individual does not have a Protected Characteristic but is targeted due to a *perception* that they do. For example, a cisgender person may experience transphobic harassment because they are mistakenly believed to be transgender.

Please refer to **Appendix iv** for further examples of what constitutes harassment.

Additional Key Points About Harassment:

- A single incident can constitute harassment
- Behaviour that continues over a long period without complaint can still amount to harassment
- Harassment does not require intent; it is the effect of a person's behaviour that determines whether it is harassment
- A person does not need to explicitly communicate that the behaviour is unwelcome or making them feel uncomfortable for it to be considered harassment
- Every individual is responsible for ensuring their behaviour is appropriate and not unwelcome. If there is any doubt, such behaviour should be avoided.

Disability discrimination

Disability discrimination (ableism) can be direct or indirect. It includes any unjustified, less favourable treatment because of a disability. Failure to make reasonable adjustments to mitigate disadvantages caused by a disability also counts as discrimination.

5. Disability and Reasonable Adjustments

Social Model of Disability

In Focus adopts the social model of disability, which sees people as disabled by societal and environmental barriers, not by their impairment or condition itself. Barriers may be physical, like buildings or public spaces not designed with accessibility in mind. They can also be caused by people's attitudes towards difference.

We recognise that disability is self-defined and respect individuals' own identification of their disability. We take individuals at their word and do not require evidence or medical documentation to validate their experience. This approach aligns with our commitment to the social model of disability, ensuring that our stakeholders feel supported and valued without unnecessary barriers or scrutiny.

Neurodivergence

Neurodivergence refers to the natural variation in how individuals think, learn, process information, and interact with the world. It encompasses a range of neurological differences, such as autism, ADHD, dyslexia, dyspraxia, and others. In Focus recognises neurodivergence as a valuable aspect of human diversity, and works to ensure that all neurodivergent individuals feel supported and included in the workplace, regardless of whether they specifically identify as having a disability.

Reasonable Adjustments

Reasonable adjustments are changes or accommodations made to the workplace, policies, practices, or job roles, to ensure individuals with disabilities or other specific needs are not disadvantaged. These adjustments are intended to remove barriers, enabling individuals to perform their roles effectively and equitably alongside their colleagues.

Examples include providing assistive technology, modifying work schedules, offering additional training, or adapting physical workspaces to improve accessibility. Reasonable adjustments aim to create an inclusive environment where everyone can thrive, regardless of their individual circumstances. While In Focus strives to anticipate and address accessibility needs proactively, we acknowledge that we cannot foresee every individual requirement. It is our hope that this policy outlines an environment that encourages employees to feel comfortable approaching their line manager to discuss specific needs or adjustments that would help them work more effectively or feel more included. Requests for adjustments will be treated with respect, confidentiality, and a collaborative approach, ensuring that solutions are tailored to the individual's circumstances, and integrated into the workplace as seamlessly as possible.

6. Recruitment

We are committed to recruiting staff and volunteers who are both suitable and safe to work with children and young people. Our recruitment process prioritises child protection while ensuring fairness, transparency, and equity at every stage.

We actively work to remove bias in recruitment by:

- Ensuring job advertisements are widely shared to reach diverse candidates and offering accommodating adjustments where needed.
- Using clear job descriptions and person specifications to avoid unnecessary barriers (such as requiring qualifications or sector experience that are not essential to the role).
- Conducting blind shortlisting to reduce unconscious bias.
- Assembling interview panels that include individuals from outside the hiring team and aim for greater diversity.
- Providing interview questions in advance and allowing candidates to familiarise themselves with the process, interviewers, and expectations.
- Offering structured feedback to all interviewed candidates to support their future applications.

All successful candidates go through rigorous safeguarding checks, including reference verification, right-to-work checks, and criminal record checks where appropriate. Induction for new hires includes mandatory child protection training to ensure a shared understanding of safeguarding responsibilities.

We strive to create an equitable and inclusive recruitment process that upholds both fairness and child safety.

In Focus is legally required to verify that all employees and volunteers have the right to work in the UK before they begin work. A list of acceptable proof of right-to-work documents can be found here: [Prove your right to work to an employer: Overview - GOV.UK](#).

To promote equity, diversity, and inclusion (EDI) in our workforce, we collect Equality and Diversity data through a Monitoring form during recruitment. This data is used solely for auditing the recruitment process and identifying areas for improvement, ensuring fair and inclusive access to roles within the organisation. All responses are anonymised and held confidentially, with no impact on individual hiring decisions -- those responsible for hiring and interviewing do not have access to this data.

7. Disciplinary action

Disciplinary procedures must be fair, transparent, and consistently applied, ensuring that no decision results in direct or indirect discrimination. Any redundancy selection, termination decisions, or disciplinary measures are objective and use justifiable criteria in line with our organisational policies.

Disciplinary actions (including warnings, dismissal, or other measures) follow a clear and structured process, ensuring that those involved:

- Receive a clear explanation of any concerns raised
- Have the opportunity to respond before any decision is made
- Are informed of their right to appeal any disciplinary outcome
- Are treated with dignity and respect throughout the process

Decisions will be proportionate to the circumstances, considering all relevant factors before action is taken.

In Focus follows a staged disciplinary process, beginning with verbal and written warnings for misconduct, escalating to final written warnings and dismissal if issues persist. Gross misconduct may result in immediate dismissal without notice. Investigations, suspension (where necessary), and disciplinary meetings will be conducted fairly, with those involved given the opportunity to present their case and request representation. The right to appeal is also ensured at each stage.

How many hours a member of staff or volunteer works, or whether their contract is fixed term, makes no difference to how they are treated. Everyone is on equal terms and conditions, adjusted proportionally to hours where that applies.

8. Reporting and Addressing Discrimination

If a stakeholder believes they have experienced discrimination, they should follow the Employer's Grievance Procedure (found in the [Employee Handbook](#)) to formally report their concerns.

Every member of the team has a responsibility to actively combat discrimination. If a stakeholder observes or is made aware of discriminatory actions directed at others, they are encouraged to report these to their manager or the Chief Executive Officer (CEO).

In cases where a grievance involves the CEO or a senior member of the leadership team, the incident should be reported directly to the Chair of Trustees.

All reports will be treated with confidentiality as far as practicable. In some cases, it may be necessary to disclose details of a complaint, in order to take appropriate action. We will seek to

protect anyone raising concerns from victimisation, taking appropriate measures to safeguard privacy wherever possible. However, please note that disciplinary action may be difficult to put in place without full cooperation or the disclosure of relevant information.

No stakeholder will face retaliation or negative consequences for making a report in good faith, regardless of the outcome. However, deliberate and malicious false allegations will be considered misconduct and handled in line with In Focus' Disciplinary Policy.

Where an investigation finds that discrimination or inappropriate conduct has taken place, appropriate action will be taken. This may include disciplinary measures and mediation. Where lack of awareness or understanding is a factor, targeted training for individuals or teams will take place. Training will only be recommended where doing so is considered an effective approach for preventing further issues.

In Focus is committed to ensuring that those affected by discrimination have meaningful input in determining how an issue is resolved. Where appropriate, the stakeholder who has made the complaint will be consulted on potential actions, including whether they would prefer mediation, corrective action, or other forms of resolution. While final decisions will be made in line with policy and legal obligations, we will take a complainant's perspective into account and keep them informed throughout the process.

If necessary, individuals making a complaint may be placed on paid leave or offered alternative working arrangements while the investigation is ongoing, particularly in cases of alleged harassment or serious misconduct.

9. Non-compliance with this policy

Failure to comply with this policy or any breach of equal opportunity legislation will be taken seriously and may result in disciplinary action, up to and including immediate dismissal, depending on the circumstances.

In some cases, individuals may be considered personally liable for acts of discrimination, and legal action may be taken against them by the affected party.

Additionally, intentionally harassing another member of the team may constitute a criminal offence.

10. Review of this policy

This policy will be reviewed annually, with the next scheduled review on **20/06/27**. The Chief Executive Officer of In Focus Education and Development will oversee the process to ensure the policy remains effective, relevant, and aligned with best practices.

We encourage stakeholders to provide feedback, suggest improvements, or seek clarification on any aspect of this policy by contacting the CEO, their line manager, or the Chair of Trustees.

As part of our commitment to inclusive leadership, young people participating in the Youth Leadership Programme will be actively involved in the policy review process, ensuring diverse perspectives are represented in shaping future improvements.

Appendix

a. The Equality Act 2010: Protected Characteristics

- Age
- Disability
- Gender reassignment
- Pregnancy and maternity
- Marriage or civil partnership
- Race – this includes ethnic or national origins, colour and nationality
- Religion or belief
- Sex
- Sexual Orientation

b. Additional Protected Characteristics included within the In Focus Equitable Access and Inclusion Policy

- Socio-economic background
- Caregiver status
- Gender expression
- Gender identity

c. Further examples of what harassment can look like:

- **Verbal Abuse:** Use of insults, slurs, or derogatory comments based on a Protected Characteristic; jokes, remarks, or language that is offensive, stereotyping, or of a sexual nature.
- **Threatening or Intimidating Behaviour:** Physical or verbal abuse directed at someone because of a Protected Characteristic.
- **Unwelcome Physical Contact:** This includes touching, hugging, kissing, pinching, patting, brushing past, invading personal space, pushing, grabbing, or any other form of assault.
- **Mocking or Belittling:** Mimicking, mocking, or belittling someone's disability, appearance, accent, or other personal characteristics.
- **Sexual Advances:** Unwelcome requests for sexual acts or favours; verbal sexual advances; vulgar, suggestive, explicit, or sexual comments or behaviour.
- **Unwanted Requests:** Repeated requests for dates or social contact, especially after it has been made clear that such requests are unwelcome.
- **Comments on Personal Matters:** Remarks about someone's body, sexual orientation, or sexual preferences.
- **Offensive Materials:** Displaying, sharing, or distributing offensive or explicit images, items, or materials related to a Protected Characteristic or of a sexual nature.

- **Exclusion or Ostracism:** Deliberately shunning someone, such as excluding them from conversations or activities.
- **'Outing' Someone:** Disclosing or threatening to disclose someone's sexual orientation without their consent.
- **Employment-Related Harassment:** Implying or explicitly suggesting that employment status, opportunities, or progression are tied to acceptance of sexual advances or other inappropriate behaviour.