



LINK EDUCATION LTD

P009 – EQUALITY, DIVERSITY & INCLUSION POLICY

VERSION 2.0 | AUGUST 2026 | CONTROLLED DOCUMENT

1 PURPOSE, COMMITMENT AND SCOPE

Link Education Ltd is committed to equality of opportunity, inclusion, dignity and respect. We will make employment, recruitment, supply and business decisions fairly, using relevant and objective criteria, and will not tolerate unlawful discrimination, harassment, sexual harassment, bullying, victimisation or retaliation.

This policy applies to directors, employees, job applicants, candidates, agency workers, contractors and consultants, and to relevant interactions with clients, pupils, parents, suppliers and the public. It covers recruitment, vetting, job advertising, pay, allocation of work, assignments, training, promotion, performance, conduct, flexible working, benefits, termination and post-employment matters.

It reflects the Equality Act 2010, Worker Protection (Amendment of Equality Act 2010) Act 2023, Employment Rights Act 2025 and relevant ACAS and EHRC guidance. Link will apply the strengthened October 2026 requirements to take all reasonable steps to prevent sexual harassment and not permit third-party harassment of employees.

2 PROTECTED CHARACTERISTICS

- age;
- disability;
- gender reassignment;
- marriage and civil partnership;
- pregnancy and maternity;
- race, including colour, nationality and ethnic or national origin;
- religion or belief, including lack of religion or belief;
- sex; and
- sexual orientation.

Protection may also apply where treatment is because of association with someone who has a protected characteristic or because a person is perceived to have one. Link will also avoid unfair treatment based on irrelevant personal circumstances not protected by the Act where this is consistent with lawful business requirements.

Link Education Ltd will not discriminate against or subject any person to less favourable treatment because of trade union membership, non-membership or lawful trade union activity.

3 PROHIBITED CONDUCT

Conduct	Meaning
Direct discrimination	Less favourable treatment because of a protected characteristic, including association or perception where
Indirect discrimination	A provision, criterion or practice that disadvantages a protected group and the individual and cannot be
Discrimination arising from disability	Unfavourable treatment because of something arising from disability that cannot be objectively justified.
Failure to make reasonable	Failure to remove a substantial disadvantage caused by a provision, physical feature or lack of auxiliary aid
Harassment	Unwanted conduct related to a relevant protected characteristic that violates dignity or creates an
Sexual harassment	Unwanted conduct of a sexual nature with the prohibited purpose or effect, including conduct by
Victimisation	Detriment because someone did, may do, or is believed to have done a protected act, such as raising or
Bullying	Offensive, intimidating, malicious or insulting behaviour or misuse of power. It may breach policy even

Conduct may be prohibited even if no offence was intended. A single serious incident may be enough. Online, social-media.

4 RECRUITMENT, SELECTION AND ADVERTISING

- Use role-relevant, objective and consistently applied criteria.
- Draft inclusive advertisements and avoid unjustified age, health, sex, nationality or other restrictions.
- Offer reasonable adjustments throughout application, interview, testing and onboarding.
- Ask health or disability questions before offer only where legally permitted.
- Do not make assumptions about pregnancy, caring responsibilities, disability, religion, age or availability.
- Record material selection decisions and monitor outcomes proportionately.
- Apply lawful right-to-work and safeguarding checks consistently without racial or nationality discrimination.
- Do not comply with a client request that unlawfully excludes a person or group.

P002 governs recruitment and vetting. Genuine occupational requirements or other exceptions must be used only where lawful, necessary, proportionate and documented with appropriate advice.

5 AGENCY WORKERS, ASSIGNMENTS AND CLIENTS

Candidates and agency workers must receive fair access to registration and assignments based on suitability, availability, lawful requirements and client need. Consultants must not act on discriminatory preferences expressed by a client, parent, colleague or worker. A discriminatory request must be challenged, recorded and escalated to a manager.

- Assignment allocation and removal decisions must have a legitimate, evidenced reason.
- Pay and contractual terms must be applied consistently, subject to lawful role and market factors and AWR rights.
- Reasonable adjustments should be discussed with the worker and client without unnecessary disclosure of medical information.
- Harassment or exclusion at a client site must be reported and addressed promptly; the worker must not simply be removed as the default response.
- Safeguarding requirements remain paramount but must be applied fairly and on evidence.

6 DISABILITY AND REASONABLE ADJUSTMENTS

Link will consider reasonable adjustments where a disabled applicant, employee or worker would otherwise face a substantial disadvantage. The person does not need to use legal terminology. Requests and indicators of possible need must be referred promptly and handled sensitively.

- Discuss the barrier and potential solutions with the individual.
- Obtain relevant occupational or specialist advice where necessary and proportionate.
- Consider changes to communication, equipment, hours, location, duties, assessment or working method.
- In an assignment, coordinate with the hirer while sharing only necessary information.
- Record the assessment, decision, implementation and review.
- If an adjustment is not considered reasonable, explain the decision and consider alternatives.

7 PREGNANCY, MATERNITY, RELIGION AND FLEXIBILITY

No person will be disadvantaged because of pregnancy, maternity leave or pregnancy-related illness. Health and safety risks, antenatal appointments, family-related leave and return-to-work arrangements will be managed under the applicable legal and internal process.

Requests connected with religion or belief, including time off, dress, diet, prayer or observance, and requests for flexible working or arrangements connected with caring responsibilities, will be considered fairly. Any refusal must be based on a genuine, lawful and proportionate reason rather than assumption or preference.

8 PREVENTING HARASSMENT AND SEXUAL HARASSMENT

Link will take proactive, all reasonable steps to prevent sexual harassment and will address risks from employees, workers, clients, candidates, suppliers and other third parties. Prevention does not wait for a complaint.

- Assess role, office, client-site, lone-working, social-event, travel, messaging and third-party risks.
- Set clear conduct standards and communicate them to staff and relevant third parties.

- Provide training for staff and managers and refresh it appropriately.
- Offer accessible reporting routes and act promptly on warning signs.
- Avoid arrangements that expose a complainant or witness to further harm or retaliation.
- Review incidents and patterns and implement corrective action.
- Use contractual or client-management measures where third-party conduct creates risk.

Examples include unwanted touching, sexual comments or jokes, intrusive questions, sexual images, repeated invitations after refusal, propositions, sexualised messages, displaying offensive material, or treating someone less favourably because they rejected or submitted to sexual conduct.

9 RESPONSIBILITIES

Role	Responsibility
Managing Director and COO	Leadership, resources, risk oversight and review of serious or systemic matters.
Managers	Fair decisions, reasonable adjustments, risk prevention, prompt action and protection from retaliation.
Consultants	Inclusive recruitment, fair assignment decisions, challenge discriminatory requests and support workers.
All personnel	Treat others with dignity, avoid prohibited conduct, complete training and report concerns.
Clients and suppliers	Maintain respectful, lawful environments and cooperate with prevention and investigation.

Individuals may be personally liable for unlawful acts. Link may also be liable for acts connected with work unless it can establish the applicable statutory defence. Everyone must therefore follow this policy and training.

10 RAISING AND HANDLING CONCERNS

An employee's personal workplace complaint should normally use the grievance procedure. Candidate, worker, client or service complaints use P007 – Complaints & Escalation Procedure. A protected disclosure in the public interest may use P013 – Whistleblowing Policy. Immediate safeguarding concerns use P001. A report will be routed correctly even if it is not labelled accurately.

- Report to a line manager, Paula Lazarus (COO) or Jamie Gray (Managing Director).
- Email compliance@link-education.co.uk or telephone 01689 878565.
- Concerns may be raised by the affected person, a witness or an authorised representative.
- Link will act fairly, sensitively and without unreasonable delay.
- Confidentiality will be protected as far as reasonably possible, but cannot be guaranteed absolutely.
- Interim measures will be neutral and proportionate and will not presume an outcome.

11 PROTECTION FROM VICTIMISATION AND RETALIATION

No person will suffer detriment for raising, supporting or participating in a genuine equality concern, requesting an adjustment or exercising a legal right. Retaliation must be reported immediately and may result in disciplinary or contractual action. A complaint that is not upheld is not automatically false or malicious.

12 TRAINING, MONITORING AND IMPROVEMENT

Relevant personnel will receive induction and refresher training. Link will review recruitment and assignment decisions, reasonable adjustments, complaints, harassment risks, outcomes and patterns where lawful and proportionate. Equality information used for monitoring will be minimised, restricted and handled under P005. Findings will inform training, process changes and corrective action.

13 RELATED CONTROLLED DOCUMENTS

- P001 – Safeguarding & Child Protection Policy
- P002 – Recruitment, Selection & Vetting Policy
- P004 – Agency Workers Regulations Policy
- P005 – GDPR, Data Protection & Information Security Policy
- P007 – Complaints & Escalation Procedure
- P013 – Whistleblowing Policy
- P019 – Code of Conduct & Ethics
- Internal grievance, disciplinary, flexible-working and family-leave procedures
- Equality, reasonable-adjustment, complaint and corrective-action records

14 DOCUMENT CONTROL

Field	Controlled information
Document title	Equality, Diversity & Inclusion Policy
Reference	P009
Version	2.0
Effective date	August 2026
Review date	August 2027
Owner	Chief Operating Officer
Approved by	Managing Director
Review frequency	Annually or sooner following legal, workforce or operational change
Status	Controlled document – active
Supersedes	Previous P009 Equal Opportunities, Diversity & Anti-Discrimination Policy