FORWARD FUTURES
GROUP
Equality Diversity and Inclusion Policy

Fair treatment inclusive practice and action against discrimination

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Applies To	All relevant employees, volunteers, associates, contractors, learners, parents/carers, commissioners and visitors, as specified in this document

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Document Control

Version	Date	Summary of Changes	Reviewed By	Approved By
2.1	September 2026	Full review: updated legal framework, reasonable adjustments, inclusive delivery, workplace harassment prevention, reporting, monitoring and cross-references.	DSL	Founder & CEO

Approval

This document must be formally approved before issue. The Founder & CEO is accountable for implementation. Managers and designated policy leads must keep related procedures, training and working arrangements aligned with it.

Reviewed by / role	Brooke Wager - Founder, CEO and Designated Safeguarding Lead
Approval date	14 September 2026
Founder & CEO approval	Brooke Wager

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1 Purpose

Forward Futures Group Ltd is committed to fair treatment, dignity, safety and meaningful inclusion in employment, volunteering, commissioning, procurement and service delivery. This policy explains the standards everyone must follow, how barriers and discrimination will be addressed, and how concerns can be raised.

Equality does not always mean treating everyone identically. We will identify relevant needs, remove avoidable barriers, make reasonable adjustments where the legal duty applies and take proportionate action so that people can participate safely and fairly.

2 Scope

This policy applies to employees, job applicants, workers, associates, volunteers, learners and service users aged 6 to 25, parents and carers, visitors, contractors, partners, commissioners and anyone acting on behalf of Forward Futures Group. It applies on our premises, during outreach and community activity, in commissioned or partner settings, while travelling for work, during online delivery and in work-related communications or events.

Employment matters and service delivery are governed by different parts of the Equality Act 2010. This policy does not give every person the same legal status, but the behavioural standards in it apply across the organisation.

3 Legal and Guidance Framework

This policy is informed by the following legislation and statutory guidance, as applicable to Forward Futures Group and the particular activity:

- Equality Act 2010, including duties concerning discrimination, harassment, victimisation and reasonable adjustments.
- Worker Protection (Amendment of Equality Act 2010) Act 2023 and any later provisions in force concerning the prevention of workplace sexual harassment.
- Human Rights Act 1998.
- Employment Rights Act 1996 and relevant employment legislation.
- Children Act 1989 and Children Act 2004.
- Keeping Children Safe in Education 2026, where Forward Futures Group works with schools and colleges or within commissioned education arrangements.
- Working Together to Safeguard Children 2026.
- UK General Data Protection Regulation and Data Protection Act 2018.

The legal position will be checked against the relevant relationship and circumstances. Lawful positive action, occupational requirements and other statutory exceptions will only be used where their conditions are met and the decision is documented.

4 Policy Commitments

Forward Futures Group will:

- provide an environment in which people are treated with dignity and respect;
- challenge discrimination, harassment, victimisation, prejudice-based bullying and exclusion;
- consider equality, accessibility, cultural context and individual need when designing and delivering services;
- make decisions using relevant evidence rather than assumptions, stereotypes or diagnostic labels;
- provide accessible ways to request support or report a concern;
- take all reasonable steps required by law to prevent sexual harassment of employees, including foreseeable risks involving third parties;
- protect people from retaliation for raising or supporting a genuine concern; and
- use complaints, safeguarding information, workforce information and feedback to identify and address patterns or barriers.

5 Protected Characteristics and Wider Inclusion

The protected characteristics under the Equality Act 2010 are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. The way protection applies differs between employment, services and other legal contexts. Discrimination because of association or perception is also unlawful in relevant circumstances.

Forward Futures Group will also challenge unfair treatment connected with socio-economic disadvantage, care experience, caring responsibilities, neurodivergence, communication need, health, appearance, family circumstance or another aspect of identity or experience, even where it is not a protected characteristic under the Equality Act.

People may experience overlapping barriers or risks. Staff must consider the whole person and avoid treating one characteristic, diagnosis or circumstance as the sole explanation for behaviour, need or safeguarding risk.

6 Unacceptable Conduct

Unacceptable conduct includes:

- direct discrimination, including less favourable treatment because of a protected characteristic;
- indirect discrimination through a provision, criterion or practice that places a protected group at a particular disadvantage and cannot be objectively justified;
- harassment, including sexual harassment and unwanted conduct that violates dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment;
- victimisation because someone has raised, supported or is believed to be involved in an equality concern or other protected act;
- failure to make a reasonable adjustment where the duty applies;
- prejudice-based bullying, discriminatory abuse, exclusion, stereotyping, slurs, unwanted sexual conduct or misuse of digital communications;
- pressuring a person not to report a concern, concealing discriminatory conduct or retaliating against a reporter or witness; and
- instructing, causing, inducing, aiding or knowingly permitting unlawful discrimination.

Conduct can be unacceptable whether it is intentional or not. A person's stated intention does not remove the need to consider the effect, surrounding circumstances and applicable legal test.

7 Reasonable Adjustments and Accessibility

Forward Futures Group will consider disability-related needs individually and, in service delivery, anticipate common barriers where the law requires this. A person does not need to use the words 'reasonable adjustment', provide a particular diagnosis or propose the final solution before an apparent barrier is considered.

Adjustments may include changing a provision, criterion or practice; addressing a physical feature; or providing an auxiliary aid or service. Examples may concern recruitment, communication, working arrangements, session structure, premises, sensory environment, technology, equipment, information formats or participation methods.

We will discuss effective options with the person, record agreed action and review whether it works. Relevant factors may include effectiveness, practicality, cost, organisational resources, disruption, health and safety, safeguarding, external funding and available support. Cost or inconvenience will not be treated as automatically decisive, and a disabled person will not be charged for a reasonable adjustment.

Where a requested adjustment cannot be provided, the reason will be explained in an accessible way. An effective alternative will be considered, and the commissioner or other responsible organisation will be involved where additional resources or a change to the arrangement is needed.

8 Inclusive Service Delivery

Referral, suitability, planning and review will consider strengths, communication, access, culture, identity, previous experience, presenting needs and the learner's or service user's wishes. Support will be based on functional need and identified barriers rather than diagnosis alone.

- Information and choices will be explained in an age-appropriate and accessible way.
- Communication, pace, structure, resources and participation methods will be adapted where reasonable and safe.
- Names, pronouns, culture, religion or belief and identity will be treated respectfully, while safeguarding concerns are considered on their evidence.
- Curriculum, activities and resources will be reviewed for avoidable stereotypes, exclusion and accessibility barriers.
- Discriminatory language or behaviour will be challenged safely and followed up proportionately.
- Commissioners and partners will be told promptly where their action, resources or statutory responsibility are needed to remove a barrier or protect a person.

Forward Futures Group will not claim to provide personal care, specialist clinical support or another service outside its agreed role. Needs will be considered before delivery, and responsibilities must be clear so that inclusion is safe, lawful and properly resourced.

9 Recruitment Employment and Working Relationships

Recruitment, selection, pay, allocation of work, induction, development, performance, discipline, redundancy and ending an engagement will be managed consistently, using relevant role requirements and evidence. Reasonable adjustments and accessible recruitment arrangements will be offered where required.

Equality monitoring information will be separated from selection decisions and restricted to people with a legitimate role. Genuine occupational requirements or positive action will only be used lawfully and with a recorded rationale.

Workplace sexual-harassment risks will be assessed and addressed proactively. Measures may include clear conduct standards, safe reporting options, proportionate training, supervision, controls for lone or off-site work and action concerning foreseeable third-party behaviour. Concerns will be acted on promptly and learning will inform prevention.

Contractors, partners and commissioned workers must meet equivalent conduct and equality standards. Serious or repeated non-compliance may affect access to premises, duties, contracts or partnership arrangements.

10 Safeguarding and Additional Vulnerability

Discriminatory bullying, sexual harassment, hate incidents, identity-based abuse and targeted online conduct may also be safeguarding concerns. Staff must follow SGP-001 Safeguarding and Child Protection Policy immediately where a child, young person or adult may be at risk of harm.

Protected characteristics, SEND, language, culture, trauma, behaviour or communication difference must not be used to minimise risk, blame the person affected or create a barrier to disclosure. Staff must consider whether discrimination or bias is affecting how risk is understood or how help is offered.

For commissioned learners, Forward Futures Group will record and share the concern promptly with the commissioning setting and confirm who is taking action. It may contact safeguarding agencies directly where delay, unavailability or an inadequate response could leave someone at risk.

11 Roles and Responsibilities

11.1 Founder and CEO

- approves this policy and is accountable for organisational compliance and culture;
- ensures appropriate resources, reporting routes and oversight; and
- reviews significant concerns, trends, risks and improvement action.

11.2 Managers and Policy Leads

- apply this policy consistently in decisions and working arrangements;
- consider and record reasonable-adjustment requests promptly;
- respond to concerns fairly and seek specialist advice where needed; and
- address patterns, training needs and barriers identified through practice or feedback.

11.3 Staff Workers Volunteers and Contractors

- treat others with dignity, use inclusive professional conduct and challenge concerns safely;
- follow agreed adjustments and report barriers they cannot resolve;
- report discrimination, harassment, retaliation or safeguarding concerns without delay; and
- cooperate with enquiries while maintaining confidentiality.

11.4 Learners Service Users and Visitors

Learners, service users and visitors are expected to treat others respectfully and follow reasonable safety and conduct expectations. Responses to concerning behaviour will consider age, understanding, communication and additional need without excusing harm or failing to protect others.

12 Raising a Concern

A concern may be raised verbally or in writing with a member of staff, a manager or the Founder & CEO. Accessible communication, an advocate, interpreter, parent, carer or trusted adult may be used where appropriate. A person does not need to identify the correct legal term or prove discrimination before the concern will be heard.

A concern about the Founder & CEO will be referred to an independent appropriate person with no conflict of interest. Immediate danger must be reported to emergency services, and safeguarding concerns must follow safeguarding procedures without waiting for an equality or employment process.

The appropriate route may be the Complaints Policy, grievance, disciplinary process, Whistleblowing Speak Up Policy, safeguarding procedure or a commissioning organisation's process. Forward Futures Group will explain the route and will not pass a person between organisations without clarifying who owns the next action.

13 Responding to Concerns

Concerns will be acknowledged and considered promptly, fairly and by a person with sufficient independence and competence. Immediate steps may be taken to protect safety, preserve information, prevent retaliation or maintain a fair process. These steps are precautionary and do not predetermine the outcome.

The response will normally:

- clarify the concern, desired communication method and any adjustment needed;
- identify safeguarding, employment, contractual or commissioning issues requiring a separate or coordinated response;
- consider relevant evidence and give affected people a fair opportunity to respond;
- distinguish facts, evidence, professional judgement and unresolved points;
- record findings, reasons, action, responsibility and review arrangements; and
- explain the outcome and any available review or external route as far as confidentiality permits.

No person will be disadvantaged for raising or supporting a genuine concern, requesting an adjustment or participating in an enquiry. An unsubstantiated concern will not be treated as malicious without evidence. Knowingly false allegations may be addressed fairly under the appropriate conduct procedure.

14 Confidentiality Records and Information Sharing

Information will be shared only with people who need it for a lawful and legitimate purpose. Absolute confidentiality cannot be promised where information indicates a safeguarding risk, serious misconduct, a legal duty to disclose or a need to obtain specialist advice.

Records will be accurate, proportionate, stored securely, access-controlled and retained in accordance with the relevant retention requirements. Equality-monitoring data and special-category personal data will be handled under the Data Protection Policy and applicable privacy notices, with anonymisation or aggregation used where practicable.

15 Learning Monitoring and Training

Induction and proportionate refresher learning will cover expected conduct, discrimination and harassment, reasonable adjustments, accessible practice, safe challenge, reporting routes and the relationship between equality and

safeguarding. People with recruitment, management or investigation responsibilities will receive role-appropriate guidance.

Forward Futures Group will review complaints, safeguarding themes, recruitment and workforce information, adjustment requests, service feedback, incidents and partnership concerns proportionately. Monitoring is used to identify barriers, disproportionality, repeat concerns and action needed; it is not used to make assumptions about an individual.

16 Related Documents

- OPS-006 Accessibility Statement
- OPS-007 SEND and Additional Needs Statement
- HRP-002 Safer Recruitment Policy
- HRP-013 Staff Code of Conduct and Professional Boundaries Policy
- HRP-015 Whistleblowing Speak Up Policy
- GOV-003 Complaints Policy
- SGP-001 Safeguarding and Child Protection Policy
- IGP-002 Confidentiality and Information Sharing Policy
- Data Protection Policy
- Health and Safety Policy

17 Monitoring and Review

The Founder & CEO will monitor implementation and ensure actions arising from concerns, audits, feedback or changing risk are completed. This policy will be reviewed at least annually and sooner following relevant legal or statutory-guidance changes, a serious concern or incident, audit findings, commissioning requirements or material organisational change.