



**BLACKBURN
HOUSE**

Equality, Diversity and Inclusion Policy

Version	4
Title of Policy	Equality, Diversity and Inclusion Policy
Policy Owner	ELT
Date of Authorisation	September 2025
Authorised by	ELT and Education and Quality Committee
Date for Review	September 2027

1.0 Purpose & Scope

Blackburne House is committed to promoting equality, diversity, inclusion (EDI), dignity and respect in all aspects of our operations. This policy sets out our obligations, ambitions, and the standards we expect.

This policy applies to all individuals engaged in any capacity with Blackburne House, including employees, job applicants, agency and contract workers, consultants, volunteers and any third parties in our environment. While the legal responsibilities owed to each group may differ, the organisation's commitment to equality, diversity, inclusion, and dignity applies equally to all.

Blackburne House aim to:

- Prevent discrimination, harassment, victimisation
- Promote equity, equal opportunity and an inclusive culture
- Embed EDI into decision-making, processes, and organisational culture
- Comply with all relevant legislation, judicial rulings, and adhere to best practice

This policy is underpinned by and complies with the following legislation and case law:

- Equality Act 2010 and all subsequent amendments
- Worker Protection (Amendment of Equality Act 2010) Act 2023
- Equality Act 2010 (Amendment) Regulations 2023
- For Women Scotland Ltd v The Scottish Ministers [2025] UKSC — clarification of the legal definition of “sex”
- Data Protection Act 2018 and UK General Data Protection Regulation (UK GDPR)
- Human Rights Act 1998

2.0 Definitions & Key Concepts

Protected characteristics – (as per Equality Act 2010, and amendments) – age; disability; gender reassignment; marriage & civil partnership; pregnancy & maternity; race; religion or belief; sex (biological sex, per Supreme Court ruling); sexual orientation.

Direct discrimination – treating someone less favourably because of a protected characteristic.

Indirect discrimination – applying a provision, criterion or practice which disadvantages people with a protected characteristic, unless objectively justified.

Associative discrimination – direct discrimination against someone because they are associated with another person who possesses a protected characteristic.

Harassment – unwanted conduct related to a protected characteristic which violates dignity or creates a hostile, degrading, humiliating or offensive environment.

Victimisation – treating someone unfavourably for having made or supported a complaint or grievance under the policy.

Reasonable steps – taking proportionate measures (depending on size, resources, risk, practicability) to prevent prohibited conduct.

Inclusion is the achievement of an environment in which all individuals are treated fairly and respectfully, have equitable access to opportunities and resources, feel valued, empowered and can contribute fully to the organisation's success.

Diversity is the mix of people we have working here at BH which encompasses all the protected characteristics of race, ethnicity, faith, disability, age, gender, sexual orientation, pregnancy and maternity and marriage and civil partnerships.

Equality is ensuring individuals or groups of individuals have access to the same opportunities.

Equity is ensuring that individuals or groups of individuals have access to the same opportunities and have removed any barriers that some individuals or groups may experience.

Antiracist – working to actively oppose racism by advocating for and implementing changes in working practices, policies and procedures.

3.0 Our Commitments

Zero tolerance of unlawful discrimination, harassment or victimisation

We will not tolerate any form of direct discrimination, indirect discrimination, harassment, bullying or victimisation based on a protected characteristic.

Preventing sexual harassment

We will take all reasonable steps to prevent sexual harassment, including (but not limited to):

- Clear policies, training and awareness programmes
- Robust reporting and investigation procedures
- Monitoring of complaints / incidents
- Ensuring third parties (clients, contractors, visitors) adhere to standards

Inclusion & belonging culture

We aim to foster an inclusive culture in which all people feel respected, valued, able to participate, and free to express identity (within framework of the law and policy). We encourage inclusive decision-making and equity of access to opportunities.

Anticipatory Reasonable adjustments & accessibility

We will make reasonable adjustments for employees and applicants with disabilities, and ensure accessibility in all processes (recruitment, development, workplace, digital).

Dignity & respect

We promote a respectful workplace. Language, behaviour, policies or practices that demean or isolate any individual or group are unacceptable. For more detailed information refer to the Blackburne House Staff Handbook.

Transparency, monitoring & accountability

We will collect and monitor EDI data in line with privacy and data protection law, to identify disparities and drive improvement.

Designing for Inclusivity

Blackburne House will integrate EDI into its curriculum, learner experience, and quality improvement processes, ensuring that equality analysis is undertaken for all new or revised programmes, policies, and strategic decisions. We will design for inclusivity from the outset, embedding accessibility, representation, and equity across all areas of the organisation, including education, early years provision, hospitality, conferencing, and other business operations, so that every aspect of our work reflects and advances our commitment to inclusion and belonging.

4.0 Implementation & Responsibilities

Chief Executive Officer (CEO)

CEO is responsible to the Board for ensuring that the EDI Policy, is implemented in all aspects of operations.

Education and Early Years Committee

The Education and Early Years Committee is responsible for overseeing the effective implementation of all aspects of the EDI Policy across the delivery of education and early years provision. This includes monitoring Safer Recruitment practices and assessing their impact on staff representation at all levels, as well

as ensuring that educational opportunities reach underrepresented and marginalised communities.

Executive Leadership Team (ELT)

ELT will lead by example, embedding EDI in strategy, culture and decisions. They are responsible for implementing all aspects of the EDI Policy within the organisation ensuring that effective communication, monitoring, review and reporting systems are in place.

ELT will draft, update and monitor policies and procedures ensuring that all staff receive the necessary EDI training and guidance. ELT will investigate complaints, monitor and report upon case outcomes.

Senior Management Team (SMT) and Supervisors

SMT and Supervisors will create a working culture that effectively applies EDI policies and practices across their departments. They will ensure staff undertake relevant training and development opportunities. They will be alert to possible discrimination / harassment issues and will support and implement reasonable adjustments.

All Employees

All employees of Blackburne House have an explicit responsibility, as stated in their terms and conditions of employment to promote and implement, EDI in all aspects of their work. They will undertake training and awareness for both personal and professional development, challenge inappropriate behaviour (where safe) and report concerns or complaints.

Contractors and Subcontractors

All contractors and subcontractors are monitored for compliance with Blackburne House values and EDI policy. This check forms part of the contracting and franchise approval process.

Agency and Contract Workers

Where Blackburne House engages agency or contract workers, we will work collaboratively with external providers to ensure equality and inclusion standards are met. Agency workers will be treated fairly and respectfully while undertaking duties on behalf of the organisation and will have access to the same inclusive and safe working environment as directly employed staff.

Volunteers

Volunteers play a valued role within Blackburne House. Although they may not fall within the legal definition of “employees” under the Equality Act 2010, they are entitled to the same standards of dignity, respect, and fairness. Recruitment, supervision, and training of volunteers will be conducted in accordance with inclusive practices, and volunteers will have clear routes for raising concerns or seeking support in line with organisational policies and procedures.

Students

By actively adhering to the Blackburne House EDI policy, students help build a culture where every individual feels valued, safe, and empowered to participate fully in academic and social life, regardless of their background, beliefs, or identity. This involves actively promoting mutual respect, challenging unconscious bias, and speaking up against prejudice.

5.0 Reporting, Complaints & Investigation Procedure

Blackburne House welcomes contact from stakeholders, individuals and/or organisations that wish to discuss any issues relating to EDI. All reporting, complaints and investigations are undertaken in accordance with the relevant Blackburne House policies and procedures including:

- Complaints and Compliments Policy and Procedure
- Whistleblowing Policy
- Grievance and Disciplinary Policy and Procedure
- Data Protection Policy
- Codes of Practice

Any complaints raised will receive a response in line with the organisation Complaints and Compliments Procedure, available via the Blackburne Employees should use the appropriate organisation HR procedures should they feel they have been subject to discriminatory practice.

6.0 EDI Data Collection, Monitoring and Privacy

Blackburne House is committed to collecting, analysing and using equality, diversity and inclusion (EDI) data in a lawful, fair and transparent manner to inform decision-making and monitor progress towards greater equity.

Any personal data gathered for monitoring purposes will be handled in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. Data will be collected and processed only where there is a clear and lawful basis, such as consent or legitimate interest, and solely for the purpose of advancing equality and improving organisational practice.

All information will be securely stored, anonymised or pseudonymised where possible, and access will be strictly limited to authorised personnel. When interpreting and reporting EDI data, care will be taken to ensure individuals cannot be identified, and findings will be presented in aggregate form.

Blackburne House will retain EDI data only for as long as necessary to fulfil its stated purpose, after which it will be securely deleted in line with the organisation's Data Protection Policy.

This policy will be formally reviewed every 2 years or sooner if there is a material legislative or case law change (such as further Supreme Court decisions or statutory amendments

7.0 Training & Awareness

All employees, managers, leadership will receive regular, role-appropriate training and specialised training on EDI. Blackburne House will also use internal communication channels to promote awareness campaigns, internal, toolkits, and guidance that will support embedding EDI in everyday practice.

8.0 Related Policies & Documents

- Family Support Policy
- Learner Disciplinary Policy
- Grievance & Disciplinary Policy
- Whistleblowing Policy
- Flexible Working Policy
- Safer Recruitment Policy
- Data Protection
- Codes of Conduct / Behaviour Policies
- Nursery Policies and Procedures
- Redundancy Policy
- Performance Management Policy
- DBS Policy
- Modern Slavery Policy
- SEND Policy
- Safeguarding Policy
- Health & Safety Policy