



EQUALITY, DIVERSITY AND INCLUSION POLICY

Revised on 5 January 2026

Policy owner	Chief Executive / designated EDI lead
Review cycle	At least annually, and sooner where law, guidance or organisational circumstances change
Next review	January 2027

This policy should be read alongside Axis safeguarding, safer recruitment, complaints, whistleblowing, behaviour, data protection, accessibility and health & safety policies.

1. Policy statement

Axis Educational Trust is committed to creating learning, youth, community and working environments in which people are treated with dignity, fairness and respect. We want children, young people, families, staff, volunteers, trustees, contractors and partners to be able to participate, contribute and progress without unlawful discrimination, harassment or victimisation.

Equality does not always mean treating everyone identically. People can face different barriers and may need different support or reasonable adjustments to achieve fair access and outcomes. We therefore combine equal treatment with an equitable approach: identifying barriers, listening to people with lived experience, making proportionate adjustments and taking lawful positive action where this is justified.

Axis is a secular, non-denominational and non-political charity. Our services are open to the wider community regardless of background, faith or belief. Our charitable purpose includes tackling inequalities affecting children and young people and supporting socio-economically disadvantaged communities.

2. Purpose and aims

This policy aims to ensure that Axis:

- prevents unlawful discrimination, harassment and victimisation;
- advances fair access, participation and outcomes across our services and workplace;
- fosters good relations, mutual respect and a sense of belonging;
- removes or reduces barriers linked to disability, language, poverty, migration, culture, caring responsibilities or other circumstances;
- makes reasonable adjustments for disabled people and considers accessibility from the outset;
- uses data and lived experience to identify unequal outcomes and improve practice;
- ensures recruitment, progression, volunteering and trustee opportunities are fair and inclusive;
- responds promptly and appropriately to bullying, prejudice, hate incidents and discriminatory behaviour; and
- makes EDI part of governance, safeguarding, quality improvement and everyday decision-making rather than a stand-alone commitment.

3. Scope

This policy applies across Axis Educational Trust and to all of its physical and online activities, including supplementary education, tuition, youth work, holiday programmes, employability and skills programmes, mentoring, wellbeing, sport, arts, digital learning, community support and family engagement.

It applies to trustees, employees, workers, freelancers, volunteers, students and participants, parents/carers, visitors, applicants, contractors, delivery partners and anyone acting on behalf of Axis.

4. Legal and good-practice framework

Axis will comply with the Equality Act 2010 and other relevant law. The Act protects people from discrimination in employment and in the provision of services. The way particular protections apply can differ depending on context, so decisions will be based on the law relevant to the activity concerned.

The nine protected characteristics under the Equality Act 2010 are:

- age
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity

- race
- religion or belief
- sex
- sexual orientation

Axis will interpret these terms in line with current legislation, binding case law and the Equality and Human Rights Commission (EHRC) statutory Codes of Practice. Sex and gender reassignment are distinct protected characteristics. Any decision involving single-sex services, facilities or lawful exceptions will be considered carefully, case by case, with regard to current law, safeguarding, privacy, dignity, necessity and proportionality.

Axis is not automatically subject to the Public Sector Equality Duty simply because it is a charity. Where Axis carries out a public function or delivers a service to which that duty applies, it will meet the applicable requirements. As a matter of good practice, Axis nevertheless adopts the three PSED-style principles in its own decision-making: eliminating unlawful discrimination, advancing equality of opportunity and fostering good relations.

This policy is also informed by the Children and Families Act 2014, Human Rights Act 1998, Data Protection Act 2018 and UK GDPR, relevant safeguarding guidance, the UN Convention on the Rights of the Child, the EHRC 2026 Services Code of Practice, and the 2025 Charity Governance Code.

5. What we mean by EDI

Term	Meaning
Equality	Ensuring people are not unlawfully disadvantaged and have fair access to opportunities, services and treatment.
Equity	Recognising that different people may need different support, adjustments or resources to achieve fair participation and outcomes.
Diversity	Valuing the range of identities, backgrounds, experiences, perspectives and circumstances represented in our communities and workforce.
Inclusion	Creating environments in which people feel respected, able to participate, listened to and able to influence decisions that affect them.

6. Forms of discrimination and unfair treatment

Axis will take action to prevent and address, as applicable:

- direct discrimination – treating someone less favourably because of a protected characteristic;
- indirect discrimination – applying a provision, criterion or practice that disadvantages a protected group and cannot be objectively justified;
- discrimination arising from disability;
- failure to make reasonable adjustments for disabled people;
- harassment – unwanted conduct related to a protected characteristic that violates dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment;
- sexual harassment;

- victimisation – treating someone badly because they raised, supported or were involved in an equality complaint or other protected act;
- discrimination by association or perception where covered by law; and
- bullying, prejudice, hate incidents, stereotyping or exclusionary conduct even where it may not meet the legal threshold for unlawful discrimination.

7. Our wider inclusion commitment

Axis recognises that disadvantage is not limited to the protected characteristics. In keeping with our charitable purpose, we will also seek to remove barriers associated with socio-economic disadvantage, refugee or asylum-seeking status, migration, first language, care experience, caring responsibilities, neurodiversity, digital exclusion and other circumstances that can limit participation or opportunity. These factors do not all have the same legal status as protected characteristics, but they are important to our mission and to fair service design.

We recognise that barriers may overlap. For example, a newly arrived disabled young person from a low-income household may face language, accessibility and financial barriers at the same time. Our response should consider the whole person rather than treating each issue in isolation.

8. Children, young people and service users

Axis will seek to ensure that:

- registration, admissions, referrals, fees, bursaries and access criteria are clear, fair and consistently applied;
- ability to pay does not unnecessarily prevent disadvantaged young people from accessing charitable provision;
- grouping, timetabling, behaviour management, sanctions, awards, trips and enrichment opportunities are reviewed for possible unequal impact;
- high expectations are maintained for all learners while support is adapted to individual need;
- English as an Additional Language is not treated as a lack of ability, and language support is provided where reasonably practicable;
- young people can access trusted adults and know how to report bullying, discrimination or harassment;
- activities and resources reflect a range of cultures, backgrounds, family circumstances, abilities and experiences without stereotyping;
- reasonable cultural and religious needs are accommodated where this is compatible with safeguarding, safety, the rights of others and effective delivery;
- online platforms, digital resources and communications are designed with accessibility and digital inclusion in mind; and
- young people are consulted regularly, including those less likely to volunteer their views.

9. Disability, reasonable adjustments and accessibility

Axis will take reasonable steps to ensure disabled people are not placed at a substantial disadvantage. In service provision, we will take an anticipatory approach: we will consider common accessibility needs in advance rather than waiting for an individual to encounter a barrier.

Reasonable adjustments may include, depending on need and practicability:

- changes to teaching methods, seating, routines, session length, breaks or assessment arrangements;
- accessible or alternative-format materials, larger print, captions, visual supports or assistive technology;
- physical access arrangements and suitable room allocation;
- additional time, quieter spaces or other environmental adjustments;
- changes to communication methods and, where reasonable, support with language or communication; and

- adjustments to recruitment, interviews, induction, working arrangements or volunteering.

Requests will be considered promptly, individually and respectfully. A formal diagnosis will not be treated as an automatic prerequisite for considering a practical adjustment, although proportionate evidence may be requested where needed to understand the adjustment or legal duty.

References in the previous policy to an 'SEN statement' are replaced by current terminology. Where relevant, Axis will take account of an Education, Health and Care (EHC) plan and work with parents/carers and appropriate professionals while remaining clear about the limits of our role as a supplementary and youth provider.

10. Safeguarding, bullying, harassment and hate incidents

EDI and safeguarding are closely connected. Discrimination, sexual harassment, discriminatory bullying, hate incidents and abuse can cause significant harm and will not be dismissed as 'banter', cultural misunderstanding or a private disagreement.

Concerns involving a child or adult at risk will be handled under the safeguarding policy as well as any relevant behaviour, complaints, disciplinary or whistleblowing procedure. Where appropriate, Axis will make referrals to statutory agencies or report serious incidents in line with legal and regulatory requirements.

We will consider whether behaviour linked to disability or another protected characteristic requires a reasonable adjustment or different response, while maintaining proportionate boundaries and safeguarding everyone affected.

11. Staff, volunteers, freelancers and trustees

Axis is committed to fair and inclusive recruitment, induction, development, performance management and progression. Selection and advancement will be based on relevant skills, experience, values and role requirements.

Good practice will include:

- clear and proportionate person specifications and job descriptions;
- accessible recruitment information and reasonable adjustments for applicants;
- objective shortlisting and interview criteria, with more than one decision-maker where practicable;
- avoiding unlawful or unnecessary questions about protected characteristics;
- using lawful positive action only where the statutory conditions are met;
- fair access to training, flexible working consideration, development and progression;
- regular review of recruitment and workforce data for unexplained disparities; and
- open trustee recruitment supported by a skills and diversity review, while appointing trustees primarily for the contribution they can make to the charity's governance.

12. Inclusive curriculum, activities and communication

Teaching, youth work and community programmes should promote respect, critical thinking and participation. Staff should avoid assumptions based on ethnicity, faith, sex, disability, family background, income or other characteristics. Resources should be reviewed for unnecessary stereotypes and should, where appropriate, allow young people to see a breadth of people, achievements and experiences represented.

Communications should be clear, respectful and accessible. Important information should be available in alternative formats where reasonably practicable. Translation or interpretation may be used where language is a significant barrier to access or safeguarding.

When using websites, learning platforms, social media, AI or automated tools, Axis will consider accessibility, bias, privacy and the risk of unequal outcomes. Automated or AI-generated outputs will not be relied upon as

the sole basis for high-impact decisions about recruitment, safeguarding, discipline, admissions or progression without appropriate human review.

13. Participation, voice and co-design

People affected by our services should have meaningful opportunities to shape them. Axis will use age-appropriate consultation, surveys, focus groups, parent/carer feedback, staff feedback and partner dialogue to understand barriers and identify improvements.

We will make additional efforts to hear from people who are under-represented, less confident, new to the organisation, disabled, facing language barriers or otherwise less likely to participate in formal consultation. Consultation will not replace trustee or management accountability, but it should inform decisions.

14. Data, monitoring and equality objectives

Axis will use proportionate monitoring to understand who accesses our services, who progresses, who leaves, and whether any group experiences consistently different outcomes. Depending on programme size and purpose, this may include participation, attendance, retention, attainment, progression, awards, behaviour/sanctions, complaints, recruitment and workforce data.

Equality monitoring information will be collected only where there is a clear purpose. Disclosure will normally be voluntary unless information is required for a lawful operational reason. Special category personal data will be handled in accordance with UK GDPR and the Data Protection Act 2018, with an appropriate lawful basis/condition, data minimisation, secure access and aggregated reporting. Small-number data will not be published where individuals could be identified.

The senior leadership team will maintain a proportionate EDI action plan with measurable priorities. The Board will receive at least an annual EDI report covering progress, key data, complaints/incidents, reasonable-adjustment themes, workforce/board considerations and actions for the next period.

15. Equality impact in decision-making

For significant new policies, services, restructures, eligibility criteria, fees, digital systems, premises changes or major programme changes, Axis will carry out a proportionate equality impact review. This does not need to be bureaucratic, but the decision-maker should record who may be affected, what evidence or consultation has been considered, any foreseeable disadvantage, reasonable alternatives and mitigating action.

Where a decision may materially affect a protected group, disabled access, single-sex provision or another complex legal area, senior management should seek specialist advice where appropriate before implementation.

16. Partners, contractors and procurement

Axis expects delivery partners, contractors and freelancers to act consistently with this policy while working on our behalf. Proportionate due diligence will consider equality, safeguarding, accessibility and conduct. Partnership or service agreements should make responsibilities clear, including how concerns and complaints will be handled.

17. Reporting concerns and complaints

Anyone who experiences or witnesses discrimination, harassment, bullying or exclusion is encouraged to raise it promptly with a member of staff, manager, safeguarding lead or through the relevant complaints or whistleblowing route.

Axis will take concerns seriously, respond fairly and proportionately, keep information appropriately confidential, and protect people from victimisation for raising a concern in good faith. Reasonable adjustments will be made to the complaints process where needed, and children and young people will be offered age-appropriate ways to speak up.

Complaints and incidents will be reviewed for patterns. Learning will be used to improve training, procedures, risk assessments and service design.

18. Roles and responsibilities

Role	Responsibility
Board of Trustees	Has ultimate oversight of EDI, ensures adequate governance and resources, reviews significant risks and receives assurance on progress.
Chief Executive / Senior Leadership	Leads implementation, ensures responsibilities are allocated, monitors the EDI action plan and escalates significant concerns to trustees.
Managers and Centre Leads	Apply the policy in day-to-day decisions, identify barriers, respond to concerns, arrange adjustments and ensure staff understand expectations.
Safeguarding Lead	Ensures equality-related harm involving children or adults at risk is managed consistently with safeguarding procedures.
Staff, volunteers and freelancers	Treat people with dignity, challenge inappropriate behaviour, complete required training, make reasonable adjustments within their role and report concerns.
Participants, parents/carers and visitors	Are expected to treat others respectfully and follow reasonable behavioural expectations while using Axis services.

19. Training and awareness

EDI expectations will form part of induction for relevant staff and volunteers and will be reinforced through periodic refresher training. Managers, safeguarding staff, recruiters and trustees will receive role-appropriate learning where their decisions create higher equality or safeguarding risks.

Training should be practical and evidence-based. It should help people recognise direct and indirect discrimination, harassment, reasonable-adjustment duties, inclusive communication, bias in decision-making and how to respond when concerns arise.

20. Review and continuous improvement

This policy will be reviewed at least annually and earlier where there is a significant legal or regulatory change, serious incident, organisational change or evidence that the policy is not working effectively. The review will consider feedback from young people, families, staff and volunteers, monitoring information, complaints/incidents, reasonable-adjustment themes and relevant external guidance.

The Board of Trustees is responsible for approving material revisions. The current version will be made available to staff and, where appropriate, to participants, parents/carers, partners and the public.

Appendix A – Practical EDI standards for Axis

The following standards should be used as an operational checklist:

- Access: services, fees, bursaries and registration processes are reviewed for unnecessary barriers.
- Accessibility: disabled access and reasonable adjustments are considered in advance and responded to promptly.
- Behaviour: discriminatory bullying, harassment and hate incidents are recorded and addressed.
- Curriculum and activities: resources and examples avoid unnecessary stereotypes and maintain high expectations for all.
- Communication: key information is clear and available in accessible/alternative formats where reasonably practicable.
- Recruitment: decisions use objective criteria; adjustments are offered; recruitment data is reviewed periodically.
- Voice: children, young people and families are consulted, including groups whose views are less often heard.
- Data: participation and outcome differences are reviewed without collecting more personal information than necessary.
- Governance: trustees receive annual EDI assurance and consider the diversity of perspectives available to the Board.
- Partnerships: partners and contractors understand Axis equality, safeguarding and conduct expectations.
- Digital/AI: accessibility and bias are considered before new systems are adopted; high-impact decisions retain human oversight.
- Improvement: EDI actions have named owners, timescales and measurable indicators.

Appendix B – Key references

- Equality Act 2010.
- Equality and Human Rights Commission: Code of Practice for Services, Public Functions and Associations (2026).
- Equality and Human Rights Commission: Technical Guidance for Schools in England, where relevant to education provision.
- Charity Governance Code (2025), including the Equity, Diversity and Inclusion principle.
- Charity Commission: Safeguarding and protecting people for charities and trustees.
- Children and Families Act 2014 and current Education, Health and Care (EHC) plan framework.
- Human Rights Act 1998.
- Data Protection Act 2018 and UK GDPR.
- United Nations Convention on the Rights of the Child.