



Equality and Diversity Policy

Version 5.0



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Version Control

VERSION	REVIEWER NAME	DATE	NEXT REVIEW	COMMENTS
1.0	Rena Panesar	Dec 2021	Dec 2022	First Policy.
2.0	Rena Panesar	Dec 2022	Dec 2023	Updated
3.0	Rena Panesar	Dec 2023	Dec 2024	Updated
4.0	Rena Panesar	Dec 2024	Dec 2025	Updated.
5.0	Policy Pros	Oct 2025	Oct 2026	Retemplated and updated.



Introduction

At Pathways LDN, we believe that every individual deserves the opportunity to thrive, contribute their unique talents, and achieve their professional potential. Our commitment to Equality, Diversity, and Inclusion goes far beyond legal compliance; it is a fundamental moral and ethical commitment rooted in our mission to help people find meaningful work.

We recognise that the communities we serve are rich with diverse backgrounds, experiences, and specific needs. Therefore, we are dedicated to dismantling barriers so that as many people as possible—regardless of their characteristics or circumstances—can access our services, be supported to be their very best, and successfully find their path back into employment.

This policy establishes the framework for a culture where everyone is welcomed, valued, and empowered. It is governed by the Equality Act 2010, which provides a single legal framework to protect individuals from discrimination and requires us to uphold the Public Sector Equality Duty (PSED). Lastly, it aligns with the standards set by the Department for Education (DfE) and the Ofsted Education Inspection Framework (EIF), which place a strong emphasis on the promotion of personal development, welfare, and equality for all learners.

Policy Objectives and Commitments

Pathways LDN is committed to:

- Operating a **zero-tolerance policy** against all forms of unlawful discrimination, harassment, and victimisation across all our activities.
- Proactively **promoting equality of opportunity and diversity** in employment, recruitment, training, and service delivery.
- Ensuring that all learners, including those with protected characteristics (e.g., disabilities, learning difficulties), have **fair access** to our training programmes and are provided with reasonable adjustments where needed.
- Ensuring our staff and curriculum actively promote fundamental British Values, including **mutual respect and tolerance** for those with different faiths and beliefs.



Who and what this policy applies to

This policy applies to all aspects of Pathways LDN's operations and encompasses every individual who engages with our service, regardless of their status, location, or background.

Specifically, the provisions of this policy cover:

- All Staff: Including Directors, permanent employees, temporary workers, and volunteers.
- All Learners: Including apprentices, adult skills learners, prospective candidates, and past learners in post-programme support.
- Third Parties and Partners: Including employers, partner organisations, suppliers and visitors.
- All Activities: All activities conducted on Pathways LDN premises, at partner or employer sites, and within all official communication channels, including online learning platforms and work-related social activities.

We enforce this policy in every area to ensure our commitment to fairness and non-discrimination is consistent across our entire community.

For us, equality and diversity is a
cornerstone of our business and is more
than just a policy



Definitions

Equality is the fair treatment of people by removing unfair barriers and giving everyone the same chance to succeed.

Diversity is the presence of meaningful differences among people, including background, identity, views and experiences.

Inclusion is the everyday practice of making sure everyone feels respected, can contribute, and has equal access to opportunities and support.

The Protected Characteristics – Covered under **the Equality Act 2010** consist of age, disability, gender reassignment, marriage or civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

Direct discrimination – excluding or treating an individual or group less favourably due to a protected characteristic, e.g., excluding a person from applying for a role unfairly and/or unlawfully because of a disability that has no bearing on their ability to perform in the role or harassing an individual (see below).

Indirect discrimination – excluding or treating an individual or group less favourably by putting those with a protected characteristic at a disadvantage, e.g., making a policy where a dress code negatively affects certain employees who are unable or unwilling to adhere to the policy due to religious beliefs. Indirect discrimination is less obvious than direct discrimination and may happen unintentionally.

Discrimination is not just treating one person less favourably than another. It can take place because someone associates with a person with a protected characteristic (discrimination by association) or because someone is believed to possess a protected characteristic (even though they do not), which is known as discrimination by perception.

Harassment is unwanted conduct that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive working environment. It is related to discrimination as the harassing behaviour is related to the protected characteristics.

Victimisation refers to unfair treatment or adverse action taken against an individual because they have made a complaint, raised a grievance, or supported someone else in raising an issue related to discrimination, harassment, or similar illegal or unethical activity.



Roles and Responsibilities

Directors

- Maintain oversight and ownership of this policy.
- Embed this policy into daily operations and ensure its timely review and update as necessary.
- In a timely manner, appropriately investigate and manage complaints and incidents related to discrimination.
- Support individuals who have been discriminated against.
- Work with all staff and stakeholders to promote equality, diversity, and inclusion through partnership and problem-solving.

All Staff

- Treat all individuals encountered during their work fairly, with dignity and respect.
- Never take part in any form of discriminatory behaviour.
- Step in to stop and eliminate discriminatory behaviour when it occurs, reporting any and all incidents where they feel that they have witnessed or have been a victim of discriminatory behaviour.
- Promote the values of equality and diversity amongst colleagues, clients, partners, suppliers, subcontractors and other stakeholders.
- Cooperate with investigations into breaches of this policy.

Our Stakeholders

- To treat our staff, other learners and all Pathways stakeholders with dignity and respect and never take part in any form of discriminatory behaviour.



Policy

Staff Recruitment, Selection and Employment

Promoting Diversity in the Workforce

We believe that a diverse workforce is a powerful asset and an effective tool for empowering our learners, and therefore want our workforce to reflect the diverse communities we serve.

A diverse workforce acts as a visible example to learners, demonstrating that diversity in the workforce works and that employment success is achievable for people from all backgrounds, genders, faiths, and abilities.

Our aim is to exceed our legal obligations and foster a workplace that is 100% free from discrimination and where everyone can thrive. However, we may use positive action measures—permitted under the Equality Act 2010—to encourage applications and address under-representation where identified in specific groups (e.g., in gender, race, religion, or ability/disability) and create a workforce that is truly reflective of our mission.

Recruitment and Selection

- Adverts for all roles will be non-discriminatory.
- We will ensure that external vacancies are advertised in a manner that is visible to all demographic groups.
- We will take all reasonable steps to remove barriers to the recruitment process or employment where these may disadvantage applicants who have a certain protected characteristic. For example, where an applicant has a disability, we encourage them to disclose this so that we may make reasonable adjustments wherever practicable (please contact rena@pathwaysldnlimited.com).
- We will ensure that those persons who make decisions on recruitment have read and understood this policy and, where possible, receive relevant training on the principles of equal opportunities.



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- All recruitment decisions will be based on fair and objective criteria based on an individual's suitability to perform the role (and based on their offending background where it relates to the requirements of the post).
- All recruitment and selection decisions will be open to peer review.

Training and Development

- The availability of training and development opportunities will be determined by business needs, an individual's suitability, and the availability of suitable opportunities.

Appraisal, Promotion and Transfer

- An individual's appraisal results will be based on objective assessments of individual performance and conduct.
- Appraisal results will be reviewed where there is evidence that opportunities for training, promotion and transfer are being offered disproportionately to one group of employees.
- Opportunities for promotion or transfer will be offered to individuals on the basis of their suitability for the new role only (using fair and objective criteria).

Terms of Employment, Benefits and Facilities

- We will ensure that the terms of employment and benefits are not unlawfully discriminatory.
- In particular, part-time and/or fixed-term employees will receive the same terms (pro-rata where appropriate) of employment, benefits and access to facilities as full-time and/or permanent employees.
- All employees, regardless of their protected characteristics or any other irrelevant distinction, will receive equal pay for the same or broadly similar work for work rated as equivalent and work of equal value.
- When determining pay raises, additional bonuses, etc., we will use justified assessment criteria to ensure that those benefits are applied fairly, for example, by basing decisions on appraisal results.
- We are committed to providing terms and conditions of employment that are compatible with an employee's personal commitments and encourage employees



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who have children, caring responsibilities or other personal commitments to apply for flexible working where this would better suit them.

Grievance, Disciplinary, Restructuring and Redundancy

- Our redundancy criteria, grievance, disciplinary, and capability procedures will be non-discriminatory, applied consistently and fairly to all individuals.
- We will take all reasonably practicable steps to ensure that those employees responsible for managing the disciplinary or capability procedures or administering restructuring and redundancy processes do not apply the relevant criteria in a way which it is unlawfully discriminatory.

Learner Commitment

Service Design and Delivery

We deliver our services with equal passion and dedication to everyone and recognise that many individuals accessing our services—particularly those who have faced barriers to employment—may need additional or tailored support. Therefore:

- We proactively design our services so that as many people as possible can access and meaningfully engage with them. This involves applying principles of inclusive design to our curriculum, training venues, and delivery methods.
- We will strive to work continuously with our learners and other stakeholders to gather feedback, challenge assumptions, and make our services fully inclusive, ensuring that the diverse needs of the communities we serve are central to our operational model.

Accessible Communication

We are committed to ensuring that information is accessible to everyone in our community, regardless of language, disability, or literacy level.

- We ensure that all our written and digital communications are compliant with accessibility standards. This includes ensuring all online materials are compatible with assistive technologies.
- Where required, we will provide documents in large print, easy-read formats, and will engage qualified interpreters (including British Sign Language (BSL) interpreters) to facilitate effective communication during induction, meetings, and reviews.



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Reasonable Adjustments and Support

Pathways LDN will make reasonable adjustments for learners who are disabled. This ensures that a disability or health condition does not create a barrier to accessing opportunities or succeeding in a program.

- All prospective and current learners will be proactively asked to disclose any disabilities, long-term health conditions, or learning difficulties and to formally request any reasonable adjustments needed for their training.
- We will work collaboratively with the learner, tutors, and partner employers (for apprentices and learners on placements) to ensure that adjustments are implemented both in the learning environment and the workplace.

Any learner who believes that they would benefit from reasonable adjustments (or any employer or tutor who identifies a need for the same) should contact rena@pathwaysldnlimited.com, who will be happy to help.

Procurement and Partnership Selection

Pathways LDN is committed to making ethical and social responsibility central to our procurement processes, and we view our choice of suppliers and partners not just as a business transaction but as an opportunity to support organisations that actively "do good" and share our core values, particularly in equality, diversity, and inclusion (EDI).

We will actively support businesses and organisations whose operations align with our broader ethical mandate.

Alignment with Equality and Diversity Ethos

We rigorously ensure that all suppliers, subcontractors, and employer-partners share our commitment to EDI. Our due diligence process for choosing partnerships requires evidence that the third party:

- Possesses and enforces their own comprehensive Equality and Diversity Policy that covers all nine protected characteristics under the Equality Act 2010.
- Demonstrates a practical commitment to non-discrimination in their recruitment, employment, and service delivery practices.



Staff Training, Communication, and Awareness

Pathways LDN is committed to ensuring that all personnel possess the necessary knowledge and awareness to actively prevent, detect, and respond to financial crime. Our training strategy is designed to be comprehensive, practical, and regularly reinforced.

Training is tailored to specific roles, with enhanced and specialised training provided to key personnel, including those involved in recruitment, procurement and people management.

The effectiveness of the training programme is reviewed annually by the Board, ensuring that staff knowledge is current and aligns with the latest DfE/ESFA updates.

Learner Expectations and Code of Conduct

Pathways LDN is committed to ensuring that all learners and apprentices are aware of their rights and responsibilities within our learning community. Maintaining a productive, safe, and respectful environment requires the active cooperation of every individual.

All learners will be made aware of our **zero-tolerance policy** on induction. This is a mandatory component of our onboarding process and includes clear instructions on what constitutes bullying, harassment, and victimisation.

By commencing their programme, learners acknowledge their understanding of and agreement to abide by this policy, our Anti-Bullying and Harassment Policy and the wider Code of Conduct.

Learners are expected to demonstrate dignity and respect in all settings—whether in training, at a workplace, or within online communication channels. This includes:

- Treating all staff, peers, employers, and visitors with courtesy and respect, regardless of any protected characteristic.
- Maintaining professional and appropriate boundaries with all staff and mentors.
- Refraining from any form of victimisation or retaliation against an individual who has made a complaint or assisted in an investigation.
- Having the responsibility to promptly report any instance of bullying, harassment, or witnessing of inappropriate behaviour to a member of staff.



Procedure – making a complaint about discrimination

- Any **staff member** who feels that they have been discriminated against (including being harassed or victimised) should follow the procedure outlined in our Grievance Policy to raise a formal complaint.
- Any **stakeholder (learner, job applicant, employer, partner, visitor, etc.)** who feels that they have been discriminated against (including being harassed or victimised) is asked to contact our Director at Rena@pathwaysldnlimited.com or raise the matter in writing via our Comments and Complaints Policy.

If the complaint relates to bullying, harassment or sexual harassment, please also note that we have a separate policy covering these. However, the method of managing such formal complaints is the same, and will be taken just as seriously.

Most complaints will warrant an investigation, the size of which depends on the circumstances; however, all complaints will be taken seriously and will be investigated and managed by our Directors.

Malicious Complaints

We have a duty to protect our staff, learners and all stakeholders. Therefore, any person who makes false, malicious, and vexatious allegations, which are found to have been made in bad faith, will be sanctioned appropriately.



Non-Compliance

Pathways LDN treats compliance with this Anti-Bullying and Harassment Policy with the utmost seriousness. Failure to adhere to these standards undermines the dignity of our community and compromises the integrity of our working and learning environment.

Any behaviour identified as bullying, harassment, or victimisation will be investigated promptly and fairly under the established procedures. Non-compliance includes not only being the perpetrator of the misconduct, but also:

- Witnessing a clear instance of bullying or harassment and failing to report it, particularly for staff who have a direct duty to act.
- Retaliating against another for making a complaint in good faith or for participating as a witness in an investigation.
- Making a complaint that is found to be false or malicious and is intended to harm another individual.

Any proven breach of this policy will be treated as a serious disciplinary matter. Depending on the severity and context of the offence, disciplinary action may range from a formal warning up to and including summary dismissal for gross misconduct.

Learners or contractors found in breach may face termination of their training program or contract.

Monitoring Learner and Staff Diversity

Pathways LDN is committed to rigorously monitoring demographic data to ensure this policy is effective, compliant, and actively drives inclusive outcomes. We view data collection as a vital tool for achieving equity, not just a procedural requirement.



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Data Collection and Scope

We will actively monitor the demographics of both learners and staff across all protected characteristics, as defined by the Equality Act 2010. This monitoring includes, but is not limited to:

Protected Characteristics: Age, disability, gender, ethnicity/race, religion or belief, and sexual orientation.

Learner Data: Data will be collected upon enrollment and monitored against progression, achievement rates, and withdrawal rates to identify any disparities in outcomes.

Staff Data: Data will be collected during recruitment, monitored across pay grades and training uptake, and analysed to ensure fairness in career progression.

Accountability and Improvement

The analysis of this demographic data will be used to:

Identify Adverse Impact: Pinpoint areas where policies or practices may be unintentionally creating barriers or leading to lower attainment for specific groups.

Inform Positive Action: Justify and direct positive action measures to encourage applications from underrepresented groups in the workforce or specific training programs, thereby helping our workforce reflect the communities we serve.

Policy Review: Ensure this policy is continually reviewed and updated to tackle any emerging inequalities highlighted by the data.

Note: All data collected relating to the protected characteristics will be stored securely and will not be shared without due regard. Statistical non-identifiable data may be drawn from this information; however, unless there is a need to know, personal data will only be processed as per UK GDPR or regional equivalent. Please see our Data Protection and GDPR Policy for further information.

Encouraging Feedback and Continuous Improvement

Pathways LDN views continuous feedback from all stakeholders as an indispensable tool for achieving our equality, diversity, and inclusion goals. We are committed to actively listening to our community to identify areas where we can improve our services, eliminate barriers, and foster a truly inclusive culture.



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Feedback Mechanisms

We encourage and facilitate feedback from all stakeholders, including staff, learners, employers, and partners, through several accessible channels:

Learner and Staff Surveys: Annual, anonymous surveys dedicated to equality and diversity will be conducted to gauge satisfaction levels and identify perceptions of inclusion and fairness.

Dedicated Forums: Establishing regular, open forums or learner focus groups to discuss how our services, training materials, and support systems can be made more inclusive.

Exit Interviews: Ensuring that all staff and learner exit procedures include specific questions on their experience regarding equality and discrimination.

Dedicated Contact: Maintaining a clear and easily accessible point of contact (e.g., an inclusion email or anonymous online form) for suggestions on how we can improve our practices.

Action and Accountability

All feedback received will be reviewed by the Directors. Where areas for improvement are identified, we will:

Develop Action Plans: Integrate feedback into formal action plans, assigning responsibility and setting measurable timelines for improvement.

Communicate Changes: Communicate the changes we have made as a result of feedback to show our community that their input is valued and leads to tangible action.

Reviewing

Pathways LDN Ltd. is committed to ensuring our policies are effective and up-to-date.

The Directors are responsible for this process and will review this policy at least once a year or more frequently if needed due to changes in laws, regulatory guidance, or best practice.



This policy will be made available in other formats upon request, and all learners are encouraged to speak to any member of staff if they have any questions or require clarification.

Appendix 1: Our 2–3 Year ED&I Strategy

Pathways LDN is committed to moving beyond compliance and embedding equality and diversity into our strategic growth and will implement a series of measurable 2–3 year action plans designed to increase inclusivity, diversity and inclusion.



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Pillar	Year 1: Foundational Audit & Training	Year 2: Systemic Integration & Outreach	Year 3: Leadership & Measured Impact
Workforce Diversity	Launch Positive Action recruitment campaigns aimed at increasing representation of identified underrepresented groups (e.g., staff declaring a disability).	Establish a formal, internal mentoring scheme pairing senior leaders with staff from diverse backgrounds to improve retention and progression.	Target a measurable increase in the representation of underrepresented groups in senior management roles (e.g., 20% increase).
Inclusion in Service Design	Conduct a full, external audit of all digital learning platforms and physical training venues to identify and eliminate accessibility barriers (e.g., poor screen-reader compatibility, lack of accessible ramps).	Form a permanent Inclusion Focus Group comprising diverse learners to formally review new curriculum content and service policies for hidden bias or barriers.	Develop a library of culturally sensitive and accessible resources (e.g., Easy Read versions of core policies; multi-lingual contact guides).
Measuring Equity	Establish a robust internal system for analysing baseline data on protected characteristics, focusing on entry and withdrawal rates to	Conduct analysis to monitor progression rates (moving from training to sustained work) across different demographics	Produce an annual, publicly available Equity & Inclusion Report that details goals, progress, and areas where further



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Pillar	Year 1: Foundational Audit & Training	Year 2: Systemic Integration & Outreach	Year 3: Leadership & Measured Impact
	identify where disparities begin.	(e.g., disability, gender) to ensure equitable outcomes.	intervention is needed.
Partner Accountability	Integrate mandatory EDI compliance checks into the subcontractor and employer due diligence processes, requiring partners to submit copies of their own EDI policies.	Pilot joint EDI training sessions with key employer-partners to ensure seamless support and consistent standards for apprentices on their work sites.	Implement a supplier scoring matrix that formally rewards suppliers and partners who demonstrate exceptional commitment to diversity and inclusion (aligning procurement with ethical goals).