

Equality, Diversity and Inclusion Policy – HR012

This policy applies to Impact Futures Group and its trading brands, including but not limited to Impact Futures, The Childcare Company, and First Response First Aid (FRFA), hereafter collectively referred to in this document as “the Group” or “we/us/our”. Where a policy is not applicable to all brands or entities, this will be clearly stated within the document.

1. Introduction & Ethos

At Impact Futures (IF), The Childcare Company (TCC) and First Response First Aid (FRFA), we recognise that equality, diversity and inclusion (EDI) are central to our mission, values and long-term success. We believe that our workforce should reflect the diverse society we serve — in terms of backgrounds, ethnicities, faiths and beliefs, gender identities, sexual orientations, ages, socio-economic status, disabilities, neurodiverse conditions, and ways of thinking.

Each person brings unique experiences, perspectives, skills and motivations. We value and celebrate these differences, recognising that diversity drives innovation, improves decision-making, and enhances the services we provide. We are committed to building an inclusive culture where everyone feels respected, supported, and empowered to achieve their full potential.

2. Our Commitment

- 2.1 We believe that a culture of equality, diversity and inclusion benefits our organisation, our people, and our clients. It enhances wellbeing, fosters creativity and collaboration, and enables our people to bring their authentic selves to work.
- 2.2 We are committed to complying with all relevant UK equality legislation, including the Equality Act 2010 and its nine protected characteristics. Our goal is to create a workplace that is free from discrimination, harassment, bullying and victimisation, in line with the ACAS Code of Practice.
- 2.3 We embed inclusive practices into every stage of the employee lifecycle, from recruitment and promotion to pay, learning and development, and all other aspects of employment. We are dedicated to making reasonable adjustments to support employees and applicants with disabilities or long-term health conditions.
- 2.4 We also provide training and awareness programmes to ensure all staff understand their responsibilities and can actively contribute to an inclusive workplace. Furthermore, we encourage open dialogue, listen to feedback, and address concerns promptly and fairly.
- 2.5 We will regularly review our EDI commitments and associated policies to ensure they remain up to date with changes in legislation, evolving societal expectations, and emerging best practice. This includes monitoring the effectiveness of our initiatives, gathering feedback from employees, and using relevant diversity metrics

to assess progress. Our leadership team is responsible for ensuring that EDI principles are integrated into strategic decision-making and are championed at every level of the organisation.

3. Scope and Purpose

3.1 This policy applies to all employees — whether permanent, fixed-term, or temporary — as well as agency workers, self-employed contractors, consultants, volunteers, apprentices, and any other individuals or organisations engaged to work with or represent the Company.

3.2 While it does not form part of any contract of employment or engagement, we expect all individuals working with or on behalf of the Company to comply with the principles of this policy at all times.

3.3 The purpose of this policy is to promote equality of opportunity in all areas of employment and service delivery. We aim to ensure that every decision we make is based on merit and free from bias, and to foster an inclusive culture that values a diverse range of perspectives, experiences and skills. By embracing these differences, we create a more innovative, collaborative and productive working environment that benefits both our people and the communities we serve.

3.4 We also recognise that our responsibility extends beyond compliance with the law. We aim to proactively identify and remove barriers to equality, embrace cultural competency in all aspects of our work, and engage with the communities we serve to better understand their diverse needs. This proactive approach helps ensure that our policies and practices reflect not only the letter but also the spirit of equality legislation

4. Context

4.1 This policy has been developed in accordance with the Equality Act 2010 and relevant case law, the ACAS Code of Practice on disciplinary and grievance procedures. It also reflects recognised best practice guidance for creating inclusive workplaces, ensuring that our approach is both legally compliant and aligned with the highest standards of organisational ethics.

4.2 Our policy is also informed by guidance from the Equality and Human Rights Commission (EHRC) and other relevant regulatory and advisory bodies. We take into account sector-specific codes of conduct and standards to ensure that our approach is tailored to the environments in which we operate

4.3 This policy should be read in conjunction with our Disciplinary Policy, Grievance Policy and Anti-Harassment and Anti-Bullying Policy

5. Our Expectations

5.1 We expect you, and every one of our employees, to take personal responsibility for observing, upholding, promoting and applying this policy.

5.2 Our culture is made in the day-to-day working interactions between us so creating the right environment is a responsibility that we all share.

5.3 Cultivating this culture does not happen by accident but requires ongoing commitment and nurturing. The reality is that we live in a world where areas of difference (whether gender, sexual orientation, ethnicity or

others) often translate to biases, challenges and barriers that may not be faced by others. And the more areas of difference a person brings, the more this effect can be compounded.

5.4 We expect you to treat your colleagues and third parties (including customers, suppliers, contractors, agency staff and consultants) fairly and with dignity, trust and respect. Sometimes, this may mean allowing for different views and viewpoints and making space for others to contribute.

5.5 Any dealings you have with colleagues, or third parties must be free from any form of discrimination, harassment, victimization or bullying.

5.6 If any of our employees is found to have committed, authorised or condoned an act of discrimination, harassment, victimisation or bullying, we will take action against them including (for those to whom it applies) under our Disciplinary Policy.

5.7 You should be aware that you can be personally liable for discrimination and harassment.

6. Discrimination

6.1 The Equality Act 2010 prohibits discrimination because of certain protected characteristics. These are:

- Disability
- Sex
- Gender Reassignment
- Marital or civil partnership status
- Race
- Religion or belief
- Sexual orientation
- Age
- Pregnancy or maternity

6.2 Discrimination can be intentional or unintentional and may occur directly, indirectly, by association, or by perception.

6.3 There are also two specific types of discrimination that apply only to disability: "discrimination arising from disability" and "failing to make reasonable adjustments".

6.4 Discrimination is not always obvious and can be subtle and unconscious. This stems from a person's general assumptions about the abilities, interests and characteristics of a particular group that influences how they

treat those people (known as "unconscious bias"). Such assumptions or prejudices may cause them to apply requirements or conditions that put those in particular groups at a disadvantage. Examples include:

- Steering employees into particular types of work on the basis of stereotypical assumptions without considering the particular attributes and abilities of individuals.
- Recruiting or promoting individuals into particular roles because of assumptions about the reactions or preferences of other employees or clients; and
- Using different standards for different groups of employees to judge performance.

6.5 We will take proactive steps to identify and address any systemic or structural discrimination that may exist within our organisation, whether in policies, practices, or workplace culture.

7. Different types of discrimination under the Equality Act 2010

7.1 Direct Discrimination: Treating someone less favourably because of a protected characteristic compared with someone who does not have that characteristic.

7.2 Indirect discrimination: Where a policy, procedure or way of working that applies to everyone puts people with a particular protected characteristic at a disadvantage, compared with people who do not have that characteristic, unless there is a good reason to justify it.

7.3 Associative discrimination: Treating someone less favourably because they are associated with someone who has a protected characteristic.

7.4 Discrimination by perception: Treating someone less favourably because you perceive them to have a protected characteristic even if they do not.

7.5 Discrimination arising from a disability: Treating someone unfavourably because of something connected with that person's disability and where such treatment is not justified.

7.6 Failure to make reasonable adjustments; Employers are legally obliged to make reasonable adjustments to ensure that aspects of employment, or the employer's premises, do not put a disabled person at a substantial disadvantage. Failing to comply with this duty is unlawful.

7.7 We expect all managers and employees to be aware of these different types of discrimination and to actively challenge discriminatory behaviour or decisions. Employees are encouraged to raise concerns without fear of retaliation, in line with our whistleblowing and grievance procedures

8. Harassment and Sexual Harassment

8.1 Harassment is unwanted conduct related to a protected characteristic that has the purpose or effect of:

- Violating someone else's dignity; or
- Creating an intimidating, hostile, degrading, humiliating or offensive environment for

someone else.

8.2 Sexual Harassment is:

- Conducting of a sexual nature that has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment; and
- Less favourable treatment related to sex or gender reassignment that occurs because of a rejection of, or submission to, sexual conduct.

8.3 You should refer to our Anti-Harassment and Anti-Bullying policy for further information on our procedure for reporting harassment.

8.4 We are committed to fostering a zero-tolerance culture towards harassment of any kind. This includes ensuring that all complaints are taken seriously, investigated promptly, and addressed with appropriate action. We will also provide additional support to those who have experienced harassment, including access to confidential counselling and guidance services

9. Victimisation

9.1 Victimisation is treating another person detrimentally either because that person has made a complaint of discrimination or harassment, or because they have supported someone else who has made such a complaint, for example by giving a witness statement that supports the allegations.

9.2 You should refer to our Anti-Harassment and Anti-Bullying policy for further information on our procedure for reporting victimisation.

9.3 We recognise that fear of victimisation can deter individuals from speaking up about discrimination or harassment. We will ensure that any reports are handled sensitively and confidentially, and that those raising concerns are protected from any form of reprisal. Managers have a duty to intervene early and address any behaviour that could be perceived as victimisation.

10. Bullying

10.1 There is no legal definition of bullying. However, we regard it as conduct that is offensive, intimidating, malicious, insulting, or an abuse or misuse of power, and usually persistent, that has the effect of undermining, humiliating or injuring the recipient.

10.2 Bullying can be physical, verbal or non-verbal conduct. It is not necessarily face to face and can be done by email, phone calls, online or on social media. Bullying may occur at work or outside work.

10.3 If the bullying relates to a person's protected characteristic, it may also constitute harassment and, therefore, will be unlawful.

10.4 You should refer to our Anti-Harassment and Anti-Bullying policy for further information on our procedure for reporting bullying.

11. Recruitment and Selection Practices

- 11.1 Recruitment promotion, and other selection exercises such as redundancy selection will be conducted on the basis of merit, against objective criteria that avoid discrimination. Shortlisting should be done by more than one person if possible.
- 11.2 Anyone making a decision about recruitment, promotion or career development must be free from discrimination.
- 11.3 We will ask applicants at the outset if they require any reasonable adjustments to be made to the recruitment or selection processes.
- 11.4 Every decision-maker should challenge themselves, and other members of the recruitment selection panel, to make sure that any stereotypes, unconscious bias or prejudice do not play any part in recruitment decisions.
- 11.5 You should refer to our Safer Recruitment and Selection Policy for further details.

12. Disabilities

- 12.1 If you are disabled or become disabled, you do not have to tell us. However, we would encourage you to let us know so that we can support you, for example by making reasonable adjustments to our premises or to aspects of your role, or to our working practices.
- 12.2 If you are experiencing difficulties at work because of your disability, please contact your line manager or the HR department to discuss potential reasonable adjustments that may alleviate or minimise such difficulties. We may need to discuss your needs with you and your medical adviser to help us get the right support in place.
- 12.3 If you have a disability, or you care for someone with a disability, and need emotional support or help with practical issues, please contact our employee assistance programme for free, confidential advice.

Counselling & Advice Helpline

Your counselling & advice helpline covers a variety of personal and workplace issues such as:

- ✓ Anxiety or depression
- ✓ Everyday financial or legal struggles
- ✓ Workplace stress

This service is paid for by your employer and is provided by an independent company, Wellbeing Solutions. There is no cost to you and all calls are confidential.



24/7 freephone:
0800 328 1437
employeeassistance.org.uk

 Mental health
 Work
 Law
 Money
 Family
 Older people
 Wellness
 Addiction
 Managers

13. Training

- 13.1 All new starters must attend equality, diversity and inclusion training as part of their onboarding programme.

13.2 Every current employee must attend regular equality, diversity and inclusion training on at least an annual basis.

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Signed:



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