Title	Equality, Diversity and Inclusion Policy
Issue Date	June 2026
Review Date	June 2027
Equality Analysis Date	June 2026
Equality Analysis Review Date	June 2027
Total Number of Pages	17
Owner	ELT
Distribution	All Staff, students, residents, volunteers, contractors, partners, and visitors

Definition(s)

- **Direct discrimination:** Treating someone less favourably because of a protected characteristic
- **Indirect discrimination:** Applying a provision that disadvantages a group
- **Harassment:** Unwanted conduct that violates dignity or creates a hostile environment
- **Victimisation:** Treating someone unfairly because they have made or supported a complaint

Purpose

Seashell is committed to creating an inclusive, respectful and equitable environment for everyone. Seashell will not only comply with the Equality Act 2010 but will actively work to:

- Eliminate discrimination, harassment and victimisation
- Promote equality of opportunity for all
- Foster good relations across all communities within and outside of Seashell

We recognise that individuals may experience inequality due to a combination of characteristics (intersectionality), and we are committed to addressing these experiences fairly and proactively.

We take a **proactive approach to prevention**, including meeting our duty to prevent sexual harassment and embedding inclusive practices across all aspects of our work.

Scope

This policy applies to:

- Employment and recruitment
- Education, care and support services
- Access to facilities and services
- Partnerships and contracted services

All individuals engaging with Seashell are expected to uphold this policy.

This policy is underpinned by the following legislation and guidance:

- Equality Act 2010
- Public Sector Equality Duty (where applicable and in relation to commissioning partners)
- Human Rights Act 1998

- Children and Families Act 2014
- Mental Capacity Act 2005
- Worker Protection (Amendment of Equality Act 2010) Act 2023
- UK GDPR and Data Protection Act 2018
- Keeping Children Safe in Education (latest version)

Policy

(i) Key Principles

Our approach is based on:

- Dignity and respect
- Fairness and equity
- Inclusion and belonging
- Participation and voice
- Accountability and transparency

(ii) Protected Characteristics

We do not tolerate discrimination based on any protected characteristic under the Equality Act 2010:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race (including colour, nationality and ethnic origin)
- Religion or belief
- Sex
- Sexual orientation

(iii) Prevention of Harassment and Sexual Harassment

Seashell has zero tolerance for harassment and sexual harassment.
We will:

- Take all reasonable steps to prevent sexual harassment
- Provide clear reporting mechanisms
- Deliver mandatory training for staff
- Take swift and appropriate action when concerns are raised

(iv) Disability and Reasonable Adjustments

We recognise our legal duty to make reasonable adjustments for disabled individuals.
This includes:

- Accessible environments and resources
- Flexible working arrangements where appropriate
- Adapted communication formats
- Individual support / reasonable adjustment plans

(v) Inclusive Language and Practice

We are committed to using inclusive, respectful and non-discriminatory language.
We will:

- Respect individuals' identities, including gender identity
- Use inclusive communication
- Challenge discriminatory language or behaviour

(vi) Equality in Practice

We will actively:

- Remove barriers to participation and achievement
- Promote inclusive services
- Celebrate diversity and lived experience
- Adopt anti-racist and anti-discriminatory approaches
- Work with our workforce EDI networks who advocate, feedback and inform Seashell policies, standards and areas of focus/objectives

(vii) Positive Action

Where appropriate and lawful, Seashell may take positive action to address underrepresentation and disadvantage. Such measures will be proportionate, time-limited and regularly reviewed against organisation, regional and national data and context.

(viii) Monitoring and Accountability

We will:

- Collect and analyse EDI data across staff and students
- Set measurable equality objectives
- Report progress regularly to leadership and governance bodies
- Use Equality Impact Assessments to inform decisions

(ix) Reporting and Breaches

Breaches of this policy will be treated seriously and may result in disciplinary action.
Individuals can raise concerns through:

- Grievance procedures
- Safeguarding routes
- Whistleblowing processes

All concerns will be investigated fairly and promptly.

(x) Continuous Improvement

Seashell is committed to continuous improvement in equality, diversity and inclusion through:

- Regular policy review
- Stakeholder engagement
- Listening to lived experience
- Embedding best practice

(xi) Equality Impact Assessment (EIA)

Seashell is committed to ensuring that all policies, procedures, services, organisational changes, projects and strategic decisions are developed and implemented in a way that promotes equality, diversity, inclusion and belonging.

Equality Impact Assessments (EIAs) form a key part of our decision-making process and support our commitment to:

- Eliminate unlawful discrimination, harassment and victimisation.
- Advance equality of opportunity for individuals with protected characteristics.
- Foster good relations between different groups.
- Identify and remove barriers to participation, accessibility and inclusion.
- Ensure compliance with the Equality Act 2010 and other relevant legislation.
- Promote fair and equitable outcomes for staff, students, residents, volunteers, contractors and service users.

When an Equality Impact Assessment Must Be Completed

An Equality Impact Assessment should be undertaken where there is a significant:

- New policy, procedure or strategy.
- Review or amendment of an existing policy.
- Organisational change or restructuring.
- Change to services, provision or ways of working.
- Procurement activity or commissioning decision.
- Decision affecting staff, students, residents, families or other stakeholders.

Equality Impact Assessment Process

The EIA process will:

1. Identify who may be affected by a proposed decision or change.
2. Consider potential positive, negative or unintended impacts on protected characteristic groups.

3. Assess impacts on other relevant groups, including carers, part-time workers, flexible workers, apprentices and those with additional needs.
4. Identify actions to reduce or eliminate adverse impacts.
5. Consider opportunities to improve equality, accessibility and inclusion.
6. Record evidence, consultation outcomes and mitigation actions.
7. Establish monitoring arrangements and review measures.

Protected Characteristics

Assessments must consider potential impacts relating to:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race, ethnicity, nationality and ethnic origin
- Religion or belief
- Sex
- Sexual orientation

Consideration should also be given to intersectionality, recognising that people may experience inequalities relating to more than one characteristic.

Consultation and Evidence

Where appropriate, EIAs should be informed by:

- Workforce and student demographic data.
- Recruitment, retention and progression data.
- Equality monitoring information.
- Employee engagement and stakeholder feedback.
- Complaints, grievance and safeguarding information.
- National guidance, legislation and sector benchmarking.
- Feedback from staff networks, students, families and other affected groups.

Monitoring and Review

Seashell will use information gathered through Equality Impact Assessments to:

- Inform decision-making and policy development.
- Monitor organisational equality outcomes.
- Identify trends and areas requiring improvement.
- Support the achievement of EDI objectives.
- Report progress to the Executive Leadership Team, Workforce Governance Forum and Board as appropriate.

Where an Equality Impact Assessment identifies a potential adverse impact, an action plan will be developed with clear ownership, timescales and review arrangements.

Responsibilities

Policy owners, managers and project leads are responsible for ensuring Equality Impact Assessments are completed where required and that identified actions are implemented and monitored.

The EDI Committee and People Team will provide guidance, oversight and support to promote consistency and quality in the completion of Equality Impact Assessments across the organisation.

Roles and Responsibilities

Board and Executive Leadership

- Provide strategic oversight
- Ensure compliance with legal duties
- Review EDI performance and outcomes

People Team and Admissions Teams

- Capture and report EDI data on a quarterly basis (working position subject to full system implementation to support collection and analysis)

Managers

- Embed inclusive practices
- Monitor team-level data and behaviour
- Address issues promptly

All Staff

- Act in accordance with this policy
- Challenge discrimination
- Participate in training and development

Partners and Contractors

- Demonstrate equivalent EDI standards
- Comply with contractual requirements

Related Document(s)

This policy should be read alongside:

- Safeguarding Policy
- Dignity at Work Policy
- Complaints Policy
- Safer Recruitment Policy
- Whistleblowing Policy
- Mental Capacity Act Policy
- SEND and Curriculum Policies

Equality Analysis Form

STAGE 1: Initial Screening

1. Person(s) responsible for this assessment:

Name	Nikola Giles	**Tel**	
Email	nikola.giles@seashelltrust.org.uk		
Department	People / ELT	**Date**	June 2026

2. Details of policy / service / strategy / procedure / guidance document / function:

Name of document	Equality, Diversity and Inclusion Policy
New or existing document	**New** **Existing** (delete as appropriate)

3. Briefly describe the aims and objectives:

The Equality, Diversity and Inclusion (EDI) Policy sets out Seashell's commitment to creating an inclusive, respectful and equitable environment for all staff, students, residents, volunteers, contractors, partners and visitors. The policy aims to:

- Eliminate discrimination, harassment, victimisation and bullying.
- Promote equality of opportunity for all individuals.
- Foster a culture of inclusion, belonging and respect.
- Ensure compliance with the Equality Act 2010 and other relevant legislation.

- Support accessibility and reasonable adjustments.
- Promote anti-discriminatory and anti-racist practice.
- Embed equality, diversity and inclusion into organisational decision-making, services and employment practices.
- Support the achievement of Seashell's EDI objectives and strategic priorities.

4. Who is intended to benefit from it and in what way?

This policy is intended to benefit:

- Employees and workers.
- Students and residents.
- Volunteers.
- Job applicants.
- Contractors and agency workers.
- Families, carers and visitors.
- Partner organisations and stakeholders.

The policy promotes fairness, dignity, inclusion, accessibility and equal opportunity whilst providing protection against discrimination, harassment and victimisation.

5. Are other departments involved, what will be their involvement and responsibilities?

Executive Leadership Team and Board
Strategic oversight, governance and monitoring of EDI objectives and outcomes.

Managers and Leaders
Implementation of the policy, addressing concerns and promoting inclusive behaviours

Education, Care and Health Services
Embedding inclusive practices and supporting equitable outcomes for students and residents.

EDI Networks and Staff Forums
Providing feedback, lived experience, challenge and support for continuous improvement.

People Team
Support policy development, legal compliance, workforce monitoring and reporting.

Admissions Team
Support policy development, legal compliance, student/community user monitoring and reporting.

6. What outcomes are expected?

The policy is expected to:

- Promote an inclusive and supportive culture.
- Improve equality of opportunity across employment and service delivery.
- Increase awareness and understanding of EDI responsibilities.
- Reduce incidents of discrimination, harassment and victimisation.
- Improve accessibility and inclusion for disabled people.
- Encourage reporting and resolution of EDI concerns.
- Support workforce and student diversity.
- Strengthen accountability for EDI performance and outcomes.

STAGE 2: Gathering data and analysis

7. Have you consulted on this policy / service / strategy / procedure / guidance document / function in the last 12 months?

Yes / **No** (delete as appropriate)

ELT

Workforce Governance Forum

Initial discussions with employee network groups

8. What evidence has been used for this assessment?

Details of data and evidence reviewed include:

- Equality Act 2010.
- Worker Protection (Amendment of Equality Act 2010) Act 2023.
- Workforce demographic data.
- Student and resident demographic information.
- Family and stakeholder engagement survey feedback
- Employee engagement survey feedback.
- Grievance, disciplinary and complaint trends.
- Safeguarding information and themes.

- EDI network feedback.
- Recruitment, retention and progression data.
- Staff wellbeing information.
- ACAS guidance and sector best practice.
- Previous EDI action plans and organisational objectives.

Assessment of Potential Impact

9. Could a particular group be differently affected in a negative way?

Protected Characteristic	Potential Positive Impact	Potential Negative Impact	Risk Level	Mitigation
Age	Promotes equal treatment and protection from age discrimination.	Limited awareness or understanding of age-related needs.	Low	Training, awareness raising and monitoring.
Disability	Strengthens commitment to accessibility and reasonable adjustments.	Failure to consistently implement adjustments could create barriers.	Medium	Manager training, adjustment plans and regular review.
Gender Reassignment	Encourages dignity, respect and inclusion for trans and non-binary individuals.	Potential for inappropriate behaviour or language if standards are not upheld.	Medium	Clear reporting routes, training and prompt action.
Marriage and Civil Partnership	Supports equitable treatment and access to opportunities.	No significant adverse impact identified.	Low	Ongoing monitoring.
Pregnancy and Maternity	Supports protection from discrimination and disadvantage.	Individuals may still experience unconscious bias.	Medium	Manager guidance and monitoring of outcomes.
Race/Ethnicity	Supports anti-racist practice and equitable opportunities.	Risk of systemic inequalities persisting if not proactively monitored.	Medium	Monitor workforce data, training and targeted action plans.
Religion or Belief	Encourages respect and accommodation of religious beliefs and observance.	Potential conflict between differing beliefs and viewpoints.	Low	Promote respectful dialogue and inclusive practices.
Sex	Supports gender equality and fair treatment.	Existing inequalities may continue without ongoing monitoring.	Medium	Monitor workforce trends and equality metrics.

Sexual Orientation	Promotes inclusion and protection from discrimination.	Potential under-reporting of concerns.	Low	Promote safe reporting mechanisms and awareness.

Assessment of Other Relevant Groups

Group	Impact	Mitigation
Part-time Employees	May be disadvantaged if progression or recruitment mechanisms favour full-time availability.	Ensure recruitment and progression are applied on a pro-rata and equitable basis.
Flexible Workers	Risk of reduced visibility for recognition and progression.	Manager training and monitoring of progression decisions.
Apprentices and Early Career Staff	Negative impact through structured pay arrangements and development pathways.	Maintain transparent progression criteria.
Carers	Flexible working arrangements can support retention.	Ensure access to progression opportunities is not affected by caregiving responsibilities.

10. Does the Policy Eliminate Unlawful Discrimination, Harassment and Victimisation?
Yes.

The policy supports compliance with equality legislation by:

- Establishing clear standards of expected behaviour.
- Prohibiting discrimination, harassment and victimisation.
- Promoting equality of opportunity.
- Supporting reasonable adjustments and accessibility.
- Providing routes for reporting concerns and complaints.
- Requiring monitoring and accountability for EDI outcomes.
- Supporting proactive prevention of sexual harassment.

11. Identified Risks and Actions

Risk	Action Required	Owner	Timescale
Under-reporting of discrimination or harassment concerns	Promote awareness of reporting mechanisms and support available	People Team	Ongoing

Lack of understanding of EDI responsibilities	Mandatory EDI training and refresher programmes	ELT/ People Team	Annually
Underrepresentation of certain groups	Monitor workforce and student diversity data and develop action plans	ELT / People Team / Admissions Team	Quarterly
Inconsistent application of inclusive practices	Provide guidance, training and manager accountability measures	Managers / People Team	Ongoing
Failure to implement reasonable adjustments effectively	Regular review and monitoring of adjustment processes	Managers / People Team	Ongoing

12. **Monitoring Arrangements:**
    - Annual review of the EDI Policy
    - Workforce diversity monitoring
    - Student and resident diversity monitoring
    - Recruitment, retention and progression analysis
    - Grievance, disciplinary and complaint monitoring
    - Review of reasonable adjustment requests and outcomes
    - EDI network feedback
    - Reporting to ELT, Workforce Governance Forum and Board
    - Review of progress against EDI objectives and action plans

13. If you have entered YES against any of the protected characteristics above please complete section 13. If not, please proceed to section 14.

Are there any other policies / services / strategies / procedures / guidance documents / functions that need to be assessed alongside this screening?	
Yes / **No** (delete as appropriate) If **yes**, please identify which groups are affected:	
Should this policy / service / strategy / procedure / guidance document / function proceed to a full Equality Analysis?	
Yes / **No** (delete as appropriate) If the answer is **no** please give reasons for this decision	
Date by which the full Equality Analysis is to be completed	

Declaration

14. I / We are satisfied that an initial screening has been carried out on this policy / service / strategy / procedure / function (delete those which do not apply) and a full Equality Impact Assessment is / is not required.

Completed by	N Giles	**Date**	June 26
Role	CPO	**Date for Review**	June 27

STAGE 3: Full Assessment

15. What previous consultation has taken place or will take place with each equality group either externally or internally?

16. What does the consultation indicate about the negative impact?

STAGE 4: Responding to the results of Impact Assessment

Protected characteristic(s) affected: _____

What changes do you propose to make to the policy / service / strategy / procedure / guidance document / function as a result of research and / or consultation?

Negative Impact	Changes Proposed	Lead	Timescale	Will this remove the negative impact? YES / NO	Resource Implication	Comments

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STAGE 5: Consultation of the final policy

17. If there is a negative impact, what will you do to promote equality and improve relations within equality groups?

18. a) How will you monitor / evaluate and check the policy / service / strategy / procedure / guidance document / function?

b) When will it be reviewed?

Completed by		**Date Started**	
Role		**Date Completed**	

I am satisfied that a full Equality Impact Assessment has been undertaken in respect of _____ (name of policy / service / strategy / procedure / function).

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I understand that this Equality Impact Assessment is required and take responsibility for its completion and quality.

Sign	
Date	
Date for Review	