Enemy of Boredom

Equality and Diversity Policy

Approved by:	Steve Godwin, CEO
Date approved:	12th October 2026
Next review due by:	Within 12 months of approval, or sooner if legislation or statutory guidance changes
Policy owner:	Tracey Clark, COO
Applies to:	Everyone connected with Enemy of Boredom, at all centres and in all online and off-site provision

1. Scope

This policy applies to:

- learners, whether children or adult learners, and their parents and carers;
- staff, workers, volunteers and board members;
- applicants for employment, volunteering and placements;
- visitors, contractors, commissioners' staff and external partners; and
- anyone else involved in our activities or provision.

It should be read alongside our Child Protection and Safeguarding Policy, Behaviour Policy, Staff Code of Conduct, Safer Recruitment Policy and Data Protection Policy.

2. Aims and principles

Enemy of Boredom is committed to providing an inclusive, respectful and safe environment for learners, staff, parents and carers, visitors, contractors and the wider community. We aim to make sure that everyone is treated fairly, with dignity and respect, and that no one is unlawfully discriminated against, harassed or victimised.

We are a specialist alternative provision for neurodivergent learners, all of whom have special educational needs and disabilities (SEND), and some of whom are also disabled within the meaning of the Equality Act 2010. We design our provision around each learner's needs, strengths and EHC plan outcomes. Equality does not mean treating everyone in the same way. It means giving everyone fair access, and adapting what we do where that is needed.

We want to raise awareness and make sure there is equality of opportunity in everything we do, by:

- discussing equality and diversity at key meetings (section 11);
- considering equality when we write or review any policy;

- promoting equality and good relations between all our stakeholders and showing best practice in doing so; and
- monitoring the outcomes for, and experiences of, our learners, staff and the wider community (section 11).

3. Legal and statutory framework

- The Equality Act 2010, which applies to us as an employer, as a provider of services and as a provider of education.
- The public sector equality duty. Where it applies to functions we carry out for commissioners, we comply with it. In any case we work to its aims: to eliminate discrimination, advance equality of opportunity and foster good relations.
- The Children and Families Act 2014 and the SEND Code of Practice, for learners with EHC plans.
- The Human Rights Act 1998.
- The Employment Rights Act 2025, which strengthens employers' duties to prevent sexual harassment and harassment of staff by third parties from 30 October 2026.
- The Data Protection Act 2018 and UK GDPR, which protect the equality information we hold.

The national standards for non-school alternative provision expect providers not to discriminate on grounds such as disability, race, religion or gender, and to consider reasonable adjustments for children with disabilities. Guidance is referred to by name rather than by year, and the link leads to the current version.

4. Definitions

Direct discrimination: treating someone worse because of a protected characteristic, including because of their association with someone who has one, or because they are wrongly thought to have one.

Indirect discrimination: applying a rule or way of working to everyone that puts people who share a protected characteristic at a disadvantage, where we cannot justify it.

Discrimination arising from disability: treating a disabled person unfavourably because of something that arises from their disability, such as behaviour, where we cannot justify it.

Failure to make reasonable adjustments: not making the changes that the law requires so that a disabled person is not at a substantial disadvantage.

Harassment: unwanted conduct related to a protected characteristic, or of a sexual nature, that violates someone's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment for them.

Victimisation: treating someone badly because they have made, supported or been involved in a complaint about discrimination, or have raised a concern.

Third party: anyone who is not Enemy of Boredom or one of its employees, such as a learner, parent or carer, visitor or contractor.

Commissioner: the school or local authority that places a learner with us.

5. Roles and responsibilities

- **The CEO and Board of Directors** have overall responsibility for our compliance with equality law.
- **The COO** leads the annual review of this policy and of our equality information with the Heads of Centre, and makes sure staff have the training and support they need.
- **Heads of Centre** make sure this policy is followed at their centre, that reports of discrimination and harassment are dealt with, and that reasonable adjustments are made and reviewed.
- **The Designated Safeguarding Lead** receives any report that may also be a safeguarding concern.
- **All staff** act on this policy, challenge discriminatory language and behaviour whenever they see it, and report it.
- **Learners, visitors and contractors** are expected to follow our expectations of mutual respect. Learners are supported to do so through the Behaviour Policy.

6. Protected characteristics

We will not unlawfully discriminate because of any protected characteristic under the Equality Act 2010:

- age;
- disability;
- gender reassignment;
- marriage and civil partnership, in employment;
- pregnancy and maternity;
- race, including colour, nationality, and ethnic or national origin;
- religion or belief;
- sex; and
- sexual orientation.

7. Learners and learning

We make sure that all learners have fair access to learning, support, opportunities and positive relationships with staff. All learners are held to high standards and given the same opportunities, and we adapt how we help each one meet them. We promote positive attitudes in a diverse community, whatever a learner's background, race, gender, culture or sexual orientation. Staff:

- provide inclusive learning experiences, and consider each learner's individual needs and barriers to learning;
- make sure resources, displays and teaching materials avoid stereotypes and reflect positive images of all people;
- challenge discriminatory language and behaviour;
- support learners to understand equality, diversity, respect and positive relationships;
- listen to learners about their experience of our provision and the adjustments that help them; and
- refer safeguarding concerns to the DSL where appropriate.

We monitor the content of lessons and of materials that learners access or create, to make sure it is respectful, non-discriminatory and suitable for their age.

Information about a learner's disability or ethnicity is never used to refuse a place. We use information about needs to decide what support and adjustments to put in place. Before deciding on a sanction, we consider whether behaviour may arise from a learner's disability, as set out in our Behaviour Policy.

8. Reasonable adjustments

We make reasonable adjustments for disabled learners, staff, applicants, visitors and others where the law requires, to remove or reduce substantial disadvantage. Adjustments may involve communication, the environment, learning activities, working arrangements, recruitment processes or access to services, and may include extra equipment or support.

- We plan ahead for the needs of our learners and do not wait to be asked. We do not wait for a diagnosis or an EHC plan before considering adjustments for a learner.
- We consider requests promptly, sensitively and on a case-by-case basis. For adult learners we agree adjustments with the learner.
- We record the adjustments we make, for learners in their plan and for staff on their personnel record, and review them regularly.
- If we decide that an adjustment is not reasonable, we explain why and discuss alternatives.

9. Recruitment and employment

We are committed to fair recruitment, employment and professional development. Recruitment and selection decisions are based on relevant skills, experience, qualifications, safer recruitment

requirements and suitability for the role, as set out in our Safer Recruitment Policy. All staff have fair access to continuing professional development, support and progression, subject to role requirements and our needs as an organisation.

We may ask applicants to complete equality monitoring information, including about ethnicity and disability. Providing it is voluntary. We keep it separate from selection decisions, and do not use it unlawfully. We may use information about disability where it is needed to make reasonable adjustments or to meet legal, safeguarding or health and safety duties. We handle this information as set out in our Data Protection Policy.

10. Preventing and responding to discrimination and harassment

Everyone in our community is responsible for preventing, challenging and dealing with discriminatory behaviour, abuse and intimidation. We want everyone to feel confident to identify, address and report discriminatory incidents. Visitors and contractors are expected to comply with our expectations and to show mutual respect.

10.1 Protecting staff

We take all reasonable steps to prevent sexual harassment of our staff, and harassment related to a protected characteristic, including by learners, parents and carers, visitors and contractors. In particular we:

- assess where staff are at risk and act on what we find;
- make our expectations clear to learners, parents and carers, visitors and contractors, including through the learner code of conduct;
- train staff and managers to recognise harassment and to respond to it (section 13);
- make it easy to report, and support anyone who does; and
- act on every report, which may include a sanction under the Behaviour Policy, warning or restricting access for a parent, carer, visitor or contractor, and reporting a possible offence to the police.

Where a learner is responsible, we respond in line with the Behaviour Policy and their needs, and we protect the member of staff.

10.2 Reporting

Any learner, parent or carer, staff member, visitor or contractor who experiences or sees discrimination, harassment, victimisation, bullying or unequal treatment should report it to the Head of Centre, the COO, the DSL or another senior member of staff. No one will be treated badly for reporting a concern in good faith.

10.3 Our response

- We take every report seriously, record it, and deal with it under the relevant policy or procedure. This may be the Child Protection and Safeguarding Policy, the Behaviour Policy, our Complaints Policy or the grievance and disciplinary procedures in our Employee Handbook.
- Where a concern may involve safeguarding, it goes to the DSL immediately.
- We record prejudice-based incidents involving learners as set out in section 9 of the Behaviour Policy, and tell the commissioner.
- Where an incident may be a hate crime, the DSL considers a report to the police.

11. Equality information and objectives

We monitor the outcomes for, and experiences of, our learners, staff and the wider community. At least once a year the COO and Heads of Centre review information about attendance, achievement, behaviour incidents, restrictive interventions, ended placements and recruitment for differences between groups. They take care not to draw conclusions from very small numbers, and they act on what they find. We share the findings with commissioners on request.

We set equality objectives, publish them, and review them at least every four years. Equality is discussed at Senior Leadership Team meetings at least once a term, where the COO and Heads of Centre consider any concerns, incidents and actions.

12. Equality information and data protection

Information about protected characteristics, such as ethnicity, disability, religion and sexual orientation, is special category personal data. We collect it only where we need it, tell people how we will use it, keep it secure, and use it in reports only in a form that does not identify individuals. Optional equality monitoring information is kept separately from other records. Retention periods are in the retention schedule in our Data Protection Policy.

13. Training

All staff receive training on equality, disability and neurodiversity, and on preventing harassment, at induction and as a refresher every year. Managers receive additional training on responding to reports and on making reasonable adjustments.

14. Complaints

Anyone can complain about discrimination, harassment or victimisation under our Complaints Policy, and staff can also use the grievance procedure in our Employee Handbook. A complainant can involve the commissioner at any stage. This policy does not limit anyone’s legal rights.

15. Monitoring arrangements

This policy is reviewed annually by the COO. At every review, the policy is approved by the CEO. It is reviewed sooner if legislation or statutory guidance changes, or after a significant incident. It is published on our website and is available to staff, learners, parents and carers, commissioners and the public.

16. Related policies

- Child Protection and Safeguarding Policy
- Behaviour Policy
- Staff Code of Conduct
- Safer Recruitment Policy
- Data Protection Policy
- Whistleblowing Policy