

Equality, Diversity & Inclusion Policy

Policy Owner	Director of Operations
Approved By	Board of Directors
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Applies To	All employees, tutors, Teaching Assistants, agency workers and contractors acting on behalf of LTS Group Limited

Contents

- [1. Policy Statement](#)
- [2. Our Commitment](#)
- [3. Leadership and Governance](#)
- [4. Understanding Discrimination, Harassment and Victimisation](#)
- [5. Recruitment, Selection and Client Instructions](#)
- [6. Disabled Persons and Reasonable Adjustments](#)
- [7. Age Discrimination](#)
- [8. Part-Time Workers](#)
- [9. Gender Reassignment](#)
- [10. Recruitment of Ex-Offenders](#)
- [11. Equality in Education and Service Delivery](#)
- [12. Reporting Concerns, Complaints and Monitoring](#)
- [13. Policy Approval](#)

1. Policy Statement

LTS Group Limited is a specialist provider of SEND education services and education staffing solutions. We provide one-to-one outreach tuition, mentoring and specialist educational support for children and young people with additional needs, whilst also recruiting, vetting and supplying high-quality tutors, teaching assistants and education professionals to schools, local authorities and academy trusts.

We are committed to creating an inclusive, respectful and supportive working environment where everyone is treated fairly, with dignity and respect. Equality, diversity and inclusion are fundamental to both our employment practices and the services we deliver.

LTS embraces diversity and will not unlawfully discriminate against any employee, worker, candidate, tutor, client or learner on the grounds of a protected characteristic under the Equality Act 2010 — namely age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. We will not discriminate on the grounds of trade union membership or non-membership.

Our recruitment, safeguarding and employment practices are independently assessed through APSCo Compliance+, providing external assurance that our policies and procedures meet recognised industry standards.

2. Our Commitment

- Promote equality of opportunity throughout the organisation.
- Provide a workplace free from discrimination, harassment and victimisation.
- Recruit, develop and promote employees based solely on merit, qualifications, skills and suitability.
- Make reasonable adjustments wherever practicable for disabled applicants, employees and workers.
- Provide equal access to training and professional development.
- Foster an inclusive culture where diversity is recognised as a strength.
- Regularly review policies and procedures to ensure continued compliance with legislation and best practice.

3. Leadership and Governance

The Board of Directors and Senior Leadership Team are responsible for ensuring equality, diversity and inclusion remain embedded throughout the organisation.

Managers are expected to lead by example, promote inclusive behaviours, challenge inappropriate behaviour, ensure fair recruitment and employment practices, and support employees who raise concerns.

All employees are responsible for treating colleagues, candidates, clients and learners with dignity, fairness and respect.

4. Understanding Discrimination, Harassment and Victimisation

This section sets out how the relevant legal tests under the Equality Act 2010 apply in practice, so that everyone working for or through LTS understands what these terms mean and how to recognise them.

4.1 Direct Discrimination

Direct discrimination occurs when someone is treated less favourably than another person because of a protected characteristic. This can also occur where a person does not have the characteristic themselves but is treated less favourably because they are wrongly assumed to have it, or because of their association with someone who does.

It is unlawful for LTS to discriminate on the grounds of a protected characteristic in the terms on which we offer our services, by refusing to provide a service, or in the way a service is delivered. Where a role has a

genuine occupational requirement for a particular characteristic, the client must be able to objectively justify this as a proportionate means of achieving a legitimate aim; an occupational requirement does not permit less favourable terms, and never excuses harassment or victimisation.

4.2 Indirect Discrimination

Indirect discrimination occurs when a provision, criterion or practice is applied equally to everyone but puts people who share a protected characteristic at a particular disadvantage, and cannot be objectively justified.

LTS will not accept or act on a client instruction that is indirectly discriminatory. Where a vacancy appears to require a characteristic amounting to an occupational requirement, or an instruction appears discriminatory but a client believes it can be objectively justified, LTS will not proceed with the assignment unless the client provides written confirmation of the occupational requirement, exception, or justification relied upon.

4.3 Harassment

Harassment is unwanted conduct related to a protected characteristic which has the purpose or effect of violating a person's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. This includes unwanted conduct of a sexual nature. Examples include derogatory jokes or comments, unwanted sexual advances, offensive images or gestures, unwanted physical contact, and retaliation against someone for reporting or threatening to report harassment.

Anyone who believes they have experienced or witnessed harassment should report it as soon as possible to Karen Coles, Compliance Manager (k.coles@ltsq.co.uk / 020 8629 3655), either verbally in the first instance or in writing as soon as practicable afterwards. A written complaint should include: the nature of the incident(s); the date(s), time(s) and location(s); the names of anyone involved or who witnessed it; and any supporting evidence available.

LTS will investigate every complaint thoroughly and confidentially. Where harassment is found to have occurred, appropriate remedial and disciplinary action will be taken, which may include termination of employment or engagement.

4.4 Victimisation

Victimisation occurs when someone is treated unfavourably because they have done a 'protected act' — for example, bringing or supporting a claim of discrimination, raising a grievance about discrimination, or giving evidence in relation to a discrimination complaint. LTS will not permit any employee, worker or client to victimise an individual for raising a genuine concern in good faith.

5. Recruitment, Selection and Client Instructions

LTS operates fair, transparent and merit-based recruitment, selection and deployment procedures for employees, tutors, teaching assistants and education support staff. Recruitment decisions are based solely on an individual's skills, qualifications, experience, suitability for the role and ability to meet safeguarding and professional standards.

Our safer recruitment procedures include structured applications and interviews, enhanced DBS and safeguarding checks, verification of identity, qualifications and employment history, professional references, online searches where appropriate, reasonable adjustments and equal opportunities throughout the recruitment process.

LTS will not knowingly accept or act on instructions from a client that would result in unlawful discrimination. Where a client instruction relies on an occupational requirement, or is potentially discriminatory but the client believes it can be objectively justified, LTS will require written confirmation of the justification before proceeding with the assignment.

6. Disabled Persons and Reasonable Adjustments

Discrimination against a disabled person occurs where they are treated unfavourably because of their disability, or where a provision, criterion, practice or physical feature places them at a substantial disadvantage compared to a non-disabled person.

LTS will make reasonable adjustments throughout recruitment and employment wherever practicable. In practice, this may include:

- Modifying testing and assessment procedures, or the standard expected, where relevant to the disability.
- Meeting a candidate at alternative premises that are more easily accessible.
- Building flexibility into the timing of interviews.
- Modifying application procedures and application forms — for example, alternative formats for partially sighted or blind applicants.
- Providing a reader or interpreter.
- Making reasonable adjustments to hallways, passages and doors to improve physical access, where feasible.

LTS will not discriminate against a disabled person in the arrangements for deciding who a role is offered to, in the terms on which employment or engagement is offered, by refusing to offer a role for reasons connected with disability, in access to opportunities or benefits, or by subjecting a person to any other detriment, including refusal of training, demotion, or unfair treatment. We will make career opportunities available to all people with disabilities and will make every practical effort to accommodate the needs of staff, candidates and clients.

7. Age Discrimination

It is unlawful to directly or indirectly discriminate against, harass or victimise a person because of their age — this protection applies to people of all ages, not only older or younger workers.

LTS will not discriminate on the grounds of age and will encourage clients not to include age criteria in job specifications, promoting recruitment on the basis of competence and skills instead. No age requirements will be included in advertisements placed on behalf of LTS.

Where age or date of birth information is requested during recruitment, it will only be used for equal opportunities monitoring and personal data records, and never as a basis for selection, training or promotion decisions, unless a client can objectively justify and confirm in writing a genuine occupational requirement.

Where a candidate is under the age of 22, LTS will have regard to the Conduct of Employment Agencies and Employment Business Regulations 2003 and other legislation relevant to the employment of children or young candidates — this is particularly relevant to placements made through our Teaching Assistant desk.

8. Part-Time Workers

LTS is committed to ensuring that employees and workers engaged on a part-time basis are treated on the same terms as full-time employees, on a pro-rata basis and with no detriment. This includes rates of pay, holiday entitlement, maternity and parental leave, pension scheme access, training opportunities, and treatment in any redundancy situation.

9. Gender Reassignment

LTS recognises that an employee or worker may wish to undergo gender reassignment during the course of their employment or engagement, and is committed to supporting them through this process.

We will make every effort to protect an individual who has undergone, is undergoing, or intends to undergo gender reassignment from discrimination or harassment in the workplace. Where a role creates a genuine

difficulty as a result of the transition, LTS will make every reasonable effort to identify and offer an alternative role, where this is desired by the individual.

Any employee or worker experiencing discrimination on the grounds of gender reassignment should raise this through LTS's grievance procedure, or directly with Karen Coles, Compliance Manager.

10. Recruitment of Ex-Offenders

LTS is registered with the Disclosure and Barring Service (DBS) and holds authority to request criminal record checks on individuals working with children or vulnerable adults. In line with the DBS Code of Practice, LTS operates a fair and consistent approach to the recruitment of ex-offenders.

A criminal record will not automatically be treated as a bar to employment or engagement; each case is assessed on its own facts, considering the nature of the role, the offence, and its relevance to safeguarding. Full details of our vetting and DBS verification process, including our conditional-placement procedure, are set out in our Safer Recruitment Policy.

11. Equality in Education and Service Delivery

LTS provides specialist one-to-one outreach tuition, mentoring and education support to children and young people who are often among the most vulnerable learners within the education system.

We recognise that every learner has unique educational needs, abilities, experiences and barriers to learning. Our tutors and teaching assistants are expected to promote equality, celebrate diversity and create inclusive learning environments where learners feel safe, respected and valued.

LTS will:

- Provide services that are accessible and inclusive.
- Make reasonable adjustments wherever appropriate to support individual learners.
- Recognise and respect cultural, religious and linguistic diversity.
- Adapt teaching approaches to meet individual learning needs, including SEND.
- Promote positive relationships based upon dignity, respect and mutual understanding.
- Challenge discriminatory language, prejudice or inappropriate behaviour.
- Work collaboratively with schools, local authorities, parents and carers to support equitable educational opportunities.

We believe every child and young person should have access to high-quality education regardless of disability, health needs, ethnicity, religion, gender, sexual orientation, family circumstances or socio-economic background.

12. Reporting Concerns, Complaints and Monitoring

LTS maintains procedures for monitoring compliance with this policy and for handling complaints of discrimination, harassment or victimisation. Any individual with a concern should, in the first instance, raise it with Karen Coles, Compliance Manager (k.coles@lts.co.uk / 020 8629 3655), or with Eddi Banks, Director (e.banks@lts.co.uk / 07540 881687) where the concern relates to the Compliance Manager directly.

Every complaint will be investigated fully, fairly and, so far as possible, confidentially. LTS monitors the diversity of its workforce and candidate base, and reviews this policy and associated procedures on a regular basis to ensure they remain effective and compliant with current legislation.

13. Policy Approval

Approved by the Board of Directors.

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