

Mary Pugsley MBE

Director, Hair At The Academy



Equality, Diversity, and Inclusion Policy

Written by Mary Pugsley MBE

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Mary Pugsley MBE: Director T: 07974750699

E: mp.hairattheacademy@gmail.com

W: www.hairattheacademy.co.uk

A: Cornerstone 10 Kimberley Rd Exeter EX2 4JG

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1. Introduction

The Equality Act 2010 <https://www.gov.uk/guidance/equality-act-2010-guidance> provides the central legal framework for preventing unlawful discrimination and advancing equality. Hair at the Academy is committed to applying the principles of equality, diversity and inclusion across employment, learning, training, assessment, support and all services provided by the organisation.

This policy is designed for Hair at the Academy's education and training activities, including alternative education and alternative provision arrangements. It is intended to support fair access, participation, achievement and progression for learners who may have experienced barriers to mainstream education.

1.1 Purpose of the policy

The purpose of this policy is to ensure that Hair at the Academy promotes equality of opportunity, values diversity, creates an inclusive learning and working environment, and takes reasonable and proportionate action to prevent and address discrimination, harassment and victimisation.

The policy should be read alongside the Appeals Policy, Reasonable Adjustments Policy and Procedures, Safeguarding/Child Protection Policy, Behaviour Policy, Complaints Policy, SEND arrangements and other relevant procedures.

1.2 Scope of the policy

This policy applies to all learners, prospective learners, staff, contractors, volunteers, visitors, employers, placement partners and other people who interact with Hair at the Academy. It applies to recruitment, admissions/referrals, induction, teaching and learning, assessment, work experience or placement activity, support, employment, progression, complaints and the use of services and facilities.

1.3 Equality, diversity and inclusion principles

- Equality means removing unlawful discrimination and providing fair access to opportunities, support and participation. Equality does not always mean treating everyone identically; lawful reasonable adjustments and proportionate support may be necessary to achieve equitable access.
- Diversity means recognising, respecting and valuing differences in people's backgrounds, identities, experiences, characteristics, perspectives and circumstances.
- Inclusion means creating an environment in which people feel welcomed, safe, respected, listened to and able to participate and achieve without avoidable barriers.
- Hair at the Academy will challenge prejudice, stereotyping, discriminatory language and behaviour and will promote dignity and mutual respect.
- The organisation will use the Public Sector Equality Duty principles <https://www.gov.uk/government/publications/public-sector-equality-duty-guidance-for-public-authorities> as good-practice benchmarks—eliminating discrimination,

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advancing equality of opportunity and fostering good relations—even where the statutory duty does not directly apply to the organisation.

- Equality, diversity and inclusion will be considered alongside safeguarding, wellbeing, SEND, Prevent and data-protection responsibilities.

1.4 Protected characteristics and unlawful conduct

The Equality Act 2010 <https://www.gov.uk/guidance/equality-act-2010-guidance> protects people from discrimination because of the following protected characteristics:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Race
- Religion or belief
- Sex
- Sexual orientation
- Pregnancy and maternity

Unlawful conduct under the Equality Act includes, where the relevant legal tests are met:

- Direct discrimination
- Indirect discrimination
- Discrimination arising from disability
- Failure to make reasonable adjustments for disabled people
- Harassment
- Victimisation

The organisation will also recognise that discrimination can be compounded by multiple characteristics or circumstances. Decisions will therefore consider the individual learner's needs and barriers rather than relying on assumptions or stereotypes.

1.5 Regulatory and guidance framework

This policy is England-focused and is intended to align with the legal and regulatory framework relevant to Hair at the Academy's education and alternative-provision activities. Where a different legal framework applies because of the organisation's status, commissioning arrangement, learner age or location, the applicable requirements will be followed.

- Equality Act 2010 and associated equality regulations and guidance. <https://www.gov.uk/guidance/equality-act-2010-guidance>
- Children and Families Act 2014 <https://www.gov.uk/government/publications/young-persons-guide-to-the-children-and-families-act-2014> and the SEND Code of Practice: 0 to 25 years <https://www.gov.uk/government/publications/send-code-of-practice-0-to-25>, where applicable.
- Education Act 1996 [Education Act 1996 – legislation.gov.uk](https://www.legislation.gov.uk/ukpga/1996/56) and the legal framework governing education and alternative provision, where applicable.

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- Keeping Children Safe in Education (KCSIE). KCSIE 2025 remains in force until 31 August 2026;
https://assets.publishing.service.gov.uk/media/68add931969253904d155860/Keeping_children_safe_in_education_from_1_September_2025.pdf KCSIE 2026 comes into force on 1 September 2026.
https://assets.publishing.service.gov.uk/media/6a4cf903b7203c4c023fd2f3/Keeping_children_safe_in_education_2026_.pdf Where KCSIE is not directly statutory for the provider, its safeguarding expectations will be reflected where relevant to commissioned or partner provision.
- Working Together to Safeguard Children 2026 [Keeping Children Safe in Education – GOV.UK](#) and local safeguarding arrangements, where children and young people are involved.
- Counter-Terrorism and Security Act 2015 [Counter-Terrorism and Security Act 2015 – legislation.gov.uk](#) and the Prevent duty guidance [Prevent duty guidance: England and Wales \(2023\) – GOV.UK](#), where the statutory duty applies; otherwise, the principles will inform safeguarding and risk-management practice where appropriate.
- UK GDPR [UK GDPR – ICO guidance](#) and Data Protection Act 2018 [Data Protection Act 2018 – legislation.gov.uk](#), including requirements concerning special-category personal data.
- DfE Non-school alternative provision: voluntary national standards (2025), where the organisation provides non-school alternative provision [Non-school alternative provision: voluntary national standards – GOV.UK](#)
- Relevant awarding-body requirements, including VTCT and ITEC requirements where applicable.

1.6 Responsibilities

- The Director is responsible for approving this policy, ensuring appropriate implementation, and ensuring that staff and learners understand their responsibilities.
- All staff and contractors are responsible for treating people fairly, challenging discrimination and reporting concerns through the appropriate procedure.
- Staff involved in learner admissions, referral, teaching, assessment or support must consider equality, diversity and inclusion when making decisions and arranging reasonable adjustments.
- Everyone working with learners has a responsibility to contribute to a safe, respectful and inclusive learning environment.
- The organisation will ensure that relevant staff receive appropriate training and updates on equality, safeguarding, SEND and related legal or regulatory requirements.

1.7 Review arrangements

This policy will be reviewed annually as part of Hair at the Academy's self-evaluation and quality-assurance activity.

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2. Policy statement

Hair at the Academy:

- is committed to equality in employment and fair access to education, training, services and progression;
- values and celebrates diversity and recognises the strengths that different experiences and perspectives bring;
- is committed to inclusion and to identifying and reducing barriers to participation and achievement;
- believes prejudice, discrimination, harassment, victimisation, bullying and abusive behaviour are unacceptable;
- will not unlawfully discriminate directly or indirectly and will consider the need for reasonable adjustments;
- will support learners who have SEND, disabilities or other additional needs through appropriate assessment, planning, support and referral;
- will challenge discriminatory language, stereotypes and behaviour in a proportionate and educationally appropriate way;
- will promote respectful relationships and a learning environment in which everyone can feel safe, valued and able to contribute;
- will make decisions about learners and staff based on relevant and lawful criteria, not stereotypes or protected characteristics;
- will work with commissioning schools, local authorities, parents/carers, professionals, employers and other partners where this supports equality and inclusion.

2.1 Equality

Equality of opportunity will be considered at every stage of the learner journey. Where a person is disadvantaged by a disability or other barrier, Hair at the Academy will consider lawful reasonable adjustments, accessible communication, differentiated support, flexible approaches and appropriate referrals.

2.2 Diversity

Hair at the Academy will respect differences in culture, race, ethnicity, nationality, language, religion or belief, sex, sexual orientation, gender reassignment, age, disability, family circumstances and other aspects of identity. Staff will avoid stereotypes and will use respectful, person-centred language.

2.3 Inclusion

Inclusion will be demonstrated through accessible learning, meaningful participation, respectful relationships, appropriate support and opportunities for learners to influence their learning and raise concerns. Where a learner has been excluded from or struggled within mainstream education, the organisation will seek to avoid reproducing unnecessary barriers within alternative provision.

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3. Learners and alternative education provision

Hair at the Academy recognises that alternative provision may be accessed by learners with complex educational, social, emotional, behavioural, health, SEND or safeguarding needs. Equality and inclusion therefore form an integral part of assessment, placement planning, teaching, support and review.

3.1 Access, participation and progression

- Referral and placement decisions will use relevant, lawful criteria and will not be based on stereotypes about a learner or their background.
- The organisation will consider barriers to attendance, engagement, communication, learning and progression and will work with relevant partners to address them.
- Learners will be given appropriate information about expectations, support and how to raise concerns.
- Progression and achievement opportunities will be communicated fairly and supported through appropriate guidance.

3.2 SEND and reasonable adjustments

Disabled learners and learners with special educational needs will be supported in accordance with the Equality Act 2010, the Children and Families Act 2014, the SEND Code of Practice and applicable commissioning arrangements. Reasonable adjustments will be considered where required, including adjustments to communication, the learning environment, teaching approaches, assessment arrangements, equipment, timetables or support.

Where needs cannot be met safely or appropriately within the provision, the organisation will work with the learner, parent/carers where appropriate, the referring school or local authority and relevant professionals to identify appropriate additional support or alternative arrangements.

3.3 Learning, curriculum and resources

- Learning materials will be selected and presented in ways that promote respect and avoid unnecessary stereotypes or discriminatory content.
- Teaching and assessment will be adapted where reasonably required to enable disabled learners to participate.
- Staff will encourage respectful discussion of difference and will address discriminatory myths or assumptions in an educationally appropriate way.
- Where resources or activities create an equality barrier, staff will seek a reasonable and proportionate alternative.

3.4 Safeguarding, bullying and discriminatory behaviour

Discriminatory bullying, harassment, abuse or violence will be treated as a safeguarding and behaviour concern where appropriate. Concerns will be managed under the Safeguarding/Child Protection Policy, Behaviour Policy, Complaints Policy and other

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relevant procedures. Staff must report concerns rather than attempting to manage serious safeguarding matters informally.

3.5 Referral, placement and transition arrangements

Where learners are referred by a school, local authority or other partner, relevant equality, SEND and safeguarding information will be shared lawfully and on a need-to-know basis. Transition planning will consider reasonable adjustments, accessibility, communication needs, continuity of support and the learner's views.

4. Staff, contractors and visitors

Hair at the Academy is committed to ensuring that personnel are recruited, selected, supported and able to progress within the organisation in a fair and equitable manner, based on relevant attributes, skills, experience, qualifications and performance.

Employment decisions will comply with the Equality Act 2010 [Equality Act 2010 – legislation.gov.uk](https://legislation.gov.uk) and other applicable law.

- Recruitment and selection will be based on objective and relevant criteria.
- Training, development and progression opportunities will be provided fairly.
- Reasonable adjustments will be considered for disabled workers and applicants.
- Contractors and visitors are expected to comply with the organisation's equality, dignity, safeguarding and behaviour expectations.

5. Discrimination, harassment and victimisation

Hair at the Academy will not tolerate unlawful discrimination, harassment or victimisation. This includes conduct by staff, learners, contractors, visitors or other persons connected with the provision. Allegations will be taken seriously and investigated in accordance with the relevant procedure.

- Direct discrimination occurs where a person is treated less favourably because of a protected characteristic.
- Indirect discrimination may occur where a provision, criterion or practice places people sharing a protected characteristic at a particular disadvantage, unless it can be objectively justified where the law permits.
- Harassment and unwanted conduct related to a protected characteristic, or conduct of a sexual nature where the legal definition applies, will not be tolerated.
- Victimisation—detrimental treatment because a person has done, or is believed to have done, a protected act—will not be tolerated.
- Reasonable adjustments will be considered to prevent disabled people being placed at a substantial disadvantage.

Where behaviour may also amount to a safeguarding concern, criminal offence or serious risk of harm, the appropriate safeguarding, emergency or external reporting process will be followed.

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6. Monitoring, information and data protection

Hair at the Academy may monitor equality and inclusion information where there is a lawful basis and a clear purpose, such as identifying barriers to participation, checking access to services, evaluating reasonable adjustments or improving learner support. Monitoring will be proportionate and will not be used to unfairly disadvantage individuals.

Personal data will be processed in accordance with the UK GDPR [UK GDPR – ICO guidance](#) and Data Protection Act 2018 [Equality Act 2010 – legislation.gov.uk](#). Special-category data, including information concerning health, disability, race or ethnicity, religion or belief and other protected or sensitive information, will only be collected and used where there is an appropriate lawful basis and additional conditions are met. Information will be kept secure, shared only where lawful and necessary, and retained in accordance with the organisation's data-retention arrangements.

7. Raising concerns, complaints and responding to incidents

Anyone who believes they have experienced or witnessed discrimination, harassment, victimisation or an equality-related barrier should raise the concern with a member of staff or the Director as soon as reasonably practicable. Learners will be supported to raise concerns in an accessible way.

1. Record the concern and, where appropriate, any immediate safeguarding or welfare risk.
2. Consider whether safeguarding, Prevent, behaviour, complaints, employment or other procedures need to be activated.
3. Investigate fairly, proportionately and without victimising anyone who raises a concern in good faith.
4. Consider reasonable adjustments and support for the person raising the concern and anyone affected.
5. Take proportionate action and record learning, including any changes needed to practice or training.

Where a concern involves a member of the leadership team or Director, the organisation will use an appropriate independent or external route where necessary. No person will be penalised for raising a genuine concern in good faith.

8. Legislation and guidance links

The following official sources should be used when reviewing this policy. Links are provided to the current official source pages.

- [Equality Act 2010 – legislation.gov.uk](#)
- [Equality Act 2010 – Equality and Human Rights Commission guidance](#)
- [Human Rights Act 1998 – legislation.gov.uk](#)
- [Children and Families Act 2014 – legislation.gov.uk](#)

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- [SEND Code of Practice: 0 to 25 years – GOV.UK](#)
- [Education Act 1996 – legislation.gov.uk](#)
- [Children Act 1989 – legislation.gov.uk](#)
- [Keeping Children Safe in Education – GOV.UK](#)
- [Working Together to Safeguard Children 2026 – GOV.UK](#)
- [Counter-Terrorism and Security Act 2015 – legislation.gov.uk](#)
- [Prevent duty guidance: England and Wales \(2023\) – GOV.UK](#)
- [UK GDPR – ICO guidance](#)
- [Data Protection Act 2018 – legislation.gov.uk](#)
- [Non-school alternative provision: voluntary national standards – GOV.UK](#)
- [SEND: guide for schools and alternative provision settings – GOV.UK](#)

Important status note: the legal duties that apply to Hair at the Academy depend on its precise status, registration, commissioning arrangements and the age and circumstances of learners. This policy is therefore written to align with the relevant England framework for education and alternative provision without asserting that every statutory duty applies directly to every type of provision.

9. Related policies and documents

- Appeals Policy and Procedures
- Anti-bullying Policy
- Safeguarding and Child Protection Policy
- Code of Conduct and Behaviour Policy
- Complaints Policy
- Data Protection and GDPR policy

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