

Equality, Diversity and Inclusion Policy

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Operated by: Nudge Education Ltd · **Version:** Dec 2025 · **Owner:** Director of Operations

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1. Why this matters to us

At Nudge Education, we work with some of the most vulnerable and disengaged children in the UK. To do this well, we must make sure that every person who works with or for Nudge — from staff and associates to partners and commissioners — understands their responsibility to support equality, diversity and inclusion.

This policy helps us:

- Meet our legal duties under the Equality Act 2010 and related guidance.
- Create safe and supportive spaces for children, families, carers and professionals.
- Reflect our values of compassion, fairness and belonging in everything we do.

This policy should be read alongside our Safeguarding Policy, Fair Assessment Policy, and other key guidance.

2. Our promise

We are committed to making sure no child is left behind because of who they are or the barriers they face. This means:

- Respecting every individual – treating everyone with dignity, care and fairness.
- Zero tolerance for discrimination or harassment – we will act quickly and decisively if these occur.

- Accessible support – we remove barriers so that children and families can engage fully in education and life.
- Inclusive culture – our staff, associates and partners work in ways that value difference and build belonging.
- Continuous learning – we review our practice, listen to feedback, and adapt as the law and society change.

3. The law and recent changes

We follow the Equality Act 2010, which protects people from unfair treatment because of:

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

4. How we put this into practice

- Working with children and families – we design programmes around the individual, not a “one size fits all” model.
- Recruitment and staffing – we use fair and inclusive recruitment, monitoring our data to make sure opportunities are open to all.
- Making adjustments – we make reasonable changes to ensure children, staff and families can access what they need.
- Culture – we encourage open, honest conversations and embed inclusion in daily practice.
- Accountability – we monitor how we’re doing, learn from mistakes, and seek external advice when we need to.
- Partnership – we work with schools, carers, local authorities and other agencies to make sure inclusion is upheld across every child’s network.

5. Who this applies to

This policy is for:

- Children and young people we work with
- Parents, carers and foster carers
- Staff, associates, subcontractors and volunteers
- Commissioners, schools, local authorities and partner organisations

It will be available openly to anyone who works with or alongside Nudge Education, including regulators and awarding bodies.

6. Living our values

This policy is not just about rules. It is about creating a culture where everyone feels safe, valued and included.

By working together, listening to each other, and holding ourselves accountable, we can make sure Nudge Education is a place where:

- Children can thrive
- Families and carers feel supported
- Partners trust our approach
- Staff feel proud to belong

Together, we can build a fairer, more inclusive future in education — one child at a time.

NEO Online Addendum

This addendum applies the canonical Nudge Education policy above to the online provision context of Nudge Education Online (NEO). It is sourced from NEO - Equal Opportunities, Equality and Diversity Policy v04.26.docx.

NEO BY NUDGE EDUCATION

Equal Opportunities, Equality and Diversity Policy Nudge Education Online

Policy Owner	Director, Nudge Education Online & Head of School
Approved	April 2026
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Version	04.26
Operating Company	Nudge Education Ltd (Company Number 10192753)
Proprietor	Diego Melo
Accreditation Route	Online Education Accreditation Scheme (OEAS) — accreditation in progress

This policy applies to all learners, staff, practitioners, contractors, volunteers and visitors of Nudge Education Online (NEO). NEO is a fully online alternative provision for learners aged 11–18, operated by Nudge Education Ltd. NEO is not a DfE-registered independent school and is not subject to Independent Schools Inspectorate (ISI) inspection. NEO is pursuing OEAS accreditation only.

1. Policy Statement and Purpose

Nudge Education Online (NEO) is committed to eliminating discrimination, advancing equality of opportunity, and fostering positive relations across every dimension of the online learning community. NEO honours the equal worth of every learner, staff member, practitioner, family, and partner, and places diversity, inclusion, and anti-racism at the heart of its safeguarding culture. This policy fulfils NEO's obligations under the Equality Act 2010, the Human Rights Act 1998, the Children Acts 1989 and 2004, and the UN Convention on the Rights of the Child. It also aligns with OEAS accreditation criteria relating to learner welfare, inclusion, and curriculum. NEO is not a DfE-registered independent school and is not subject to ISI inspection. Maintained-sector and ISI-related frameworks are used as reference material and adapted for an online alternative provision context. This policy should be read alongside the NEO Child Protection and Safeguarding Policy, Behaviour and Regulation

Policy, SEND Policy, Teaching and Learning Policy, Data Protection, Confidentiality and Privacy Policy, Admissions Policy, and Online Safety and Acceptable Use Policy.

2. Guiding Principles

The NEO approach to equality and diversity is guided by nine core principles: All are of equal value: regardless of disability, ethnicity, culture, gender identity, religion or belief, sexual orientation, age, neurodivergence, or socioeconomic background. We recognise and respect difference: equity may require differentiated approaches, not sameness. Meeting individual needs is a strength, not a concession. We foster positive attitudes and belonging: promoting anti-racism, disability inclusion, gender equity, neurodiversity affirmation, and LGBTQ+ respect throughout curriculum, pastoral care, and community culture. We uphold fair practice in recruitment and development: ensuring equity of access, progression, and training for all staff, practitioners, contractors, and volunteers. We reduce and remove barriers: proactively identifying inequalities and making reasonable adjustments, particularly in digital access and online learning design. We consult and involve widely: valuing the voices of learners, families, and staff in shaping provision through regular feedback and co-design opportunities. We contribute to wider society: supporting learners to challenge prejudice and contribute positively in their communities, in line with the promotion of fundamental British values. We use evidence: equality monitoring data informs practice, objectives, and governance oversight. We set measurable objectives: integrated into school improvement planning and reviewed annually by the Proprietor and the Director / Head of School.

3. Legal and Regulatory Framework

Equality Act 2010 and the Public Sector Equality Duty (applied as good practice) Human Rights Act 1998 Children Act 1989 and Children Act 2004 Education Act 2002 (Section 175 — used as reference) Keeping Children Safe in Education 2026 (KCSIE) Special Educational Needs and Disability Code of Practice 2015 The UN Convention on the Rights of the Child Online Safety Act 2023 UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018 ICO Children's Code (Age Appropriate Design Code) OEAS accreditation criteria (inclusion and welfare strands) The Equality Act 2010

identifies nine protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation. NEO is committed to protecting all individuals from direct and indirect discrimination, harassment, and victimisation on the basis of any protected characteristic.

4. Equalities in the NEO Online Context

As a fully online provision, NEO recognises that equality and inclusion have particular dimensions in digital learning environments. NEO is proactive in addressing the following areas.

4.1 Online Accessibility

All teaching materials are designed to be accessible across devices, screen-reader compatible, and dyslexia-friendly. Google Classroom and Google Meet settings are configured to support closed captions, screen magnification, and keyboard navigation. Staff receive training on creating accessible digital content, including the use of alt-text for images, structured headings, and sufficient colour contrast. NEO works to WCAG 2.1 Level AA as the minimum accessibility standard for learner-facing content.

4.2 Neurodivergent Inclusion

Flexible timetabling allows learners to engage at times that suit their regulation needs. Sensory-aware teaching practices include options for cameras and microphones to be off during live lessons when regulation requires it. Content is delivered in multiple formats (video, audio, text, visual) to support diverse learning preferences. All reasonable adjustments are documented and reviewed as part of the graduated SEND approach (Assess, Plan, Do, Review).

4.3 Gender, Identity and Biological Health

NEO provides affirming spaces for discussion of gender identity, menstruation, PCOS, hormonal health, and related topics within the wellbeing curriculum. Pronouns and chosen names are respected across all platforms, registers, and communications. Staff receive training on supporting transgender and non-binary learners in line with current guidance and safeguarding duties.

4.4 Anti-Racism as Safeguarding

Racism is recognised as a form of harm. All racial incidents are recorded, reported, and addressed through safeguarding procedures. Restorative approaches are used alongside clear consequences, with termly review of incident data by the DSL and Proprietor. The curriculum actively promotes anti-racist perspectives, diverse representation, and critical thinking about structural inequality.

4.5 Digital Equity

NEO works with commissioning bodies and families to ensure learners have adequate devices and internet connectivity. Where digital poverty is identified, support is explored through equipment loans, data packages, or referral to local authority schemes. No learner is disadvantaged in their participation or assessment due to technological barriers.

4.6 Socioeconomic Inclusion

NEO is sensitive to the varied socioeconomic backgrounds of its learners and avoids practices that could cause stigma or exclusion. Costs associated with any enrichment activities or materials are communicated transparently, with support available where needed. Assessment and participation are not contingent on access to resources beyond those provided by NEO. Public examination entry fees are charged separately to families or commissioners; NEO signposts support where fee barriers arise.

5. Curriculum, Ethos and Organisation

Equality, diversity, and inclusion are embedded in every aspect of NEO's curriculum design and school culture: Teaching content reflects diversity of identity, experience, culture, and perspective. Qualified subject-specialist teachers select resources that avoid stereotypes and challenge prejudice. The Six Cornerstones pedagogy — Connection, Movement, Creativity, Reflection, Rest, and Nutrition — provides a holistic framework that values the whole learner and supports equitable participation. Online groupings, breakout rooms, and collaborative tasks are designed to be inclusive, with respect for pronouns, cultural references, and communication preferences. Staff model inclusive digital communication at all times, including the use of accessible fonts, live

captions in Google Meet, and culturally sensitive language. PSHE, relationships education, and enrichment activities promote understanding of protected characteristics, fundamental British values, and global citizenship. The curriculum supports learners in developing the knowledge and critical thinking skills to challenge discrimination and contribute to a more equitable society.

6. Spiritual, Moral, Social and Cultural Development

NEO actively promotes: Spiritual development: encouraging learners to explore beliefs, experience, and the sense of self, wonder, and purpose that emerges from connection with learning and community. Moral development: helping learners distinguish right from wrong, understand consequences, and engage with ethical dilemmas through discussion, reflection, and the curriculum. Social development: developing learners' ability to cooperate, resolve conflicts, and participate positively in their communities, both online and offline. Cultural development: fostering appreciation of the breadth of cultures in modern Britain and beyond, and understanding how culture shapes identity and experience. These dimensions are woven through all Cornerstone areas and monitored through learner voice, staff observation, and Proprietor review.

7. Roles and Responsibilities

Role	Responsibility
Proprietor	Named accountable person under OEAS; ensures NEO meets its statutory obligations under the Equality Act 2010. Approves equality objectives, monitors progress, and holds the senior team accountable. Reviews equality monitoring data at least annually.
Director, NEO & Head of School	Oversees day-to-day implementation of this policy. Ensures equality considerations are embedded in curriculum design, admissions, and staff

Role	Responsibility
	development. Coordinates with the DSL and SENCo on equality-related incidents and adjustments.
Designated Safeguarding Lead (DSL)	Treats all discrimination as a safeguarding matter. Records, investigates, and responds to equality-related incidents. Provides timely incident analysis to the Proprietor.
SENCo	Monitors the effectiveness of reasonable adjustments and SEND provision through an equality lens. Ensures that learners with protected characteristics are not disadvantaged by assessment, timetabling, or access arrangements.
Qualified subject-specialist teachers	Model inclusive practice in all live lessons. Select resources that represent diversity and challenge prejudice. Complete annual EDI training.
Named practitioners (mentors)	Model inclusive practice; notice patterns of exclusion or discomfort in pastoral conversations; escalate concerns promptly to the DSL.
All staff, contractors, volunteers	Model inclusive practice in all interactions. Challenge prejudice promptly and proportionately. Make reasonable adjustments and report concerns through safeguarding procedures. Complete annual equality, diversity, and inclusion training.
Learners	Treat all members of the NEO community with respect. Report discrimination, harassment, or bullying. Engage with opportunities to develop

Role	Responsibility
	understanding of equality and diversity through the curriculum.
Families and carers	Support NEO's equality commitments. Share concerns or experiences that can help shape more inclusive practice. Engage with NEO's values and expectations.

8. Addressing Prejudice, Discrimination and Hate

NEO operates a zero-tolerance approach to discrimination, harassment, and bullying, including racism, sexism, ableism, homophobia, biphobia, transphobia, xenophobia, and any other prejudice-related behaviour. All such incidents are treated as safeguarding matters.

8.1 Immediate Response

If an incident occurs during a live lesson via Google Meet, the teacher intervenes immediately using calm, restorative language. If safety or dignity is compromised, the learner responsible may be temporarily removed from the session while the situation is assessed by the DSL. The DSL is alerted immediately via the NEO incident reporting procedure.

8.2 Safeguarding Oversight

The DSL determines whether the incident constitutes a safeguarding, hate, or bullying concern and records it accordingly using the NEO safeguarding recording system (for example CPOMS or equivalent secure platform). The learner affected is offered support from a trusted adult, including their named practitioner, and given the opportunity to share their experience in a safe setting before resuming learning. Where the incident involves potential criminal conduct (for example, hate crime), the DSL liaises with the police and/or local authority as appropriate.

8.3 Restorative and Disciplinary Action

A restorative reflection meeting is held with all parties, facilitated by the DSL or a senior member of staff trained in restorative practice. The focus is on understanding the impact of the behaviour, restoring relationships, and agreeing next steps. Persistent or serious incidents may result in further disciplinary action in line with the NEO Behaviour and Regulation Policy, including referral to the commissioning body where applicable. Where a pattern of discriminatory behaviour is identified, a Behaviour Support Plan is developed with clear targets and review dates.

8.4 Recording and Monitoring

All equality-related incidents are logged by type (discrimination, harassment, bullying, hate), protected characteristic, and outcome. Data is reviewed termly by the DSL and shared with the Proprietor and the Director / Head of School. Trends and patterns inform curriculum updates, staff training priorities, and adjustments to online safeguards.

9. Digital Safety and Communication Controls

NEO's fully online model relies on Google Classroom, Google Meet, and Google Workspace. The following controls support the prevention and detection of discriminatory behaviour in digital environments:

Area	Control Measures
Google Meet lessons	All live lessons are hosted by staff with appropriate moderation controls. Chat functions can be restricted or disabled. Disruptive participants can be muted or removed. Sessions are recorded where safeguarding needs require it.
Google Classroom	Assignment submissions and comments are monitored by staff. Inappropriate content is removed and reported to the DSL. Learners cannot directly message peers without staff oversight.

Area	Control Measures
Google Workspace	Shared documents and collaboration spaces are monitored. Offensive or discriminatory content triggers the same safeguarding reporting protocols as incidents in live lessons.
Automated monitoring	Where available, keyword-flagging and content-monitoring tools alert staff to potentially harmful language or content in real time.

Any incident detected within these digital environments triggers the same safeguarding reporting and restorative protocols described in Section 8.

10. Staff Training and Professional Development

All staff, practitioners, contractors, and volunteers receive equality, diversity, and inclusion training as part of their induction and on an annual basis thereafter. Training covers: Understanding the Equality Act 2010 and protected characteristics Recognising and responding to discrimination, microaggressions, and structural bias Anti-racism and cultural competency in online learning environments Inclusive language, communication, and digital content design Supporting transgender and non-binary learners Neurodiversity affirmation and reasonable adjustments in digital settings Restorative practice and trauma-informed approaches to prejudice-related incidents Unconscious bias and its impact on assessment, feedback, and behaviour management Training is delivered through NEO's annual safeguarding and CPD programme and is reviewed annually. Staff feedback, incident data, and learner voice inform training priorities.

11. Inclusive Curriculum Feedback and Review

NEO's curriculum is designed to be reflective, adaptive, and learner-informed. Feedback and review mechanisms include: Termly learner voice surveys exploring how identity, belonging, and inclusion are reflected in the curriculum. A curriculum review each term, led by the Director / Head of School and

teaching staff, analysing feedback from learners, families, and staff. Opportunities for learners to co-design content or resources that reflect their lived experiences, particularly around race, gender, disability, neurodiversity, and culture. Integration of findings into curriculum planning, enrichment activities, and wellbeing themes. All feedback is reviewed by the DSL and the Director / Head of School and informs curriculum updates and staff CPD.

12. Links with External Charities and Support Networks

Following an incident of discrimination or identity-related harm, learners may be signposted or referred to specialist support services. NEO maintains awareness of organisations including: YoungMinds — emotional wellbeing and mental health advocacy for young people Black Minds Matter UK — specialist mental health support for Black individuals and communities MindOut — mental health support for LGBTQ+ communities Galop — support for LGBTQ+ people experiencing hate crime, abuse, or violence The Anne Frank Trust — anti-racism education and social action programmes NSPCC and Childline — 24-hour advice and support for young people affected by discrimination or abuse Show Racism the Red Card — anti-racism education resources Where emotional or identity-based harm has occurred, NEO arranges restorative or reflective sessions with trained staff and offers family liaison where appropriate.

13. Admissions and Access

NEO does not discriminate on the basis of any protected characteristic in its admissions arrangements. Admissions decisions are based on whether NEO can meet the learner's educational, social, emotional, and wellbeing needs, in line with the NEO Admissions Policy. Reasonable adjustments are made throughout the admissions process to ensure that learners with disabilities or additional needs are not disadvantaged. This includes adjustments to assessment tasks, interview formats, and communication methods. Where a learner is referred by a local authority or commissioning body, NEO works collaboratively to ensure that placement decisions are equitable and that the learner's views are heard and respected.

14. Equality Objectives

NEO publishes equality objectives and reports on progress annually. Current objectives for the initial period (subject to review according to the growth rate of the organisation) are:

Equality Objective	How NEO Will Measure Progress
Ensure all digital learning materials meet accessibility standards (WCAG 2.1 Level AA) by December 2026.	Annual accessibility audit of Google Classroom content, lesson resources, and assessment materials.
Achieve 100% annual completion of EDI training for all staff, practitioners, contractors, and volunteers.	Training records reviewed termly; completion tracked in the NEO CPD log.
Reduce repeat equality-related incidents by 25% year on year.	Termly incident data analysis by the DSL; trend report to Proprietor.
Ensure learner voice surveys reflect at least 85% positive responses on belonging and inclusion.	Termly survey data analysed by protected characteristic where sample size permits.
Embed anti-racist and culturally diverse perspectives in all curriculum areas by July 2027.	Curriculum review records; learner and staff feedback; external review where applicable.

Objectives are reviewed annually by the Proprietor and the Director / Head of School and updated to reflect NEO's evolving priorities and any emerging equality concerns.

15. Embedding Equality in Learner Induction

All new learners and families receive an overview of NEO's commitment to equality, diversity, and inclusion as part of the induction process. Equality and diversity expectations are integrated into the Home-School Agreement and NEO's behaviour expectations. Learners are introduced to NEO's values and assured that NEO is a community where everyone has the right to feel safe, valued, and represented. Induction sessions include information on how to report discrimination or concerns, and who to speak to for support — typically starting with the named practitioner.

16. Monitoring and Review

Equality-related incidents are logged by type and protected characteristic and reviewed termly by the DSL and Proprietor. Incident data, learner voice surveys, and staff feedback inform curriculum improvement, training priorities, and accessibility developments. The policy is reviewed annually, or earlier if national equality legislation, guidance, OEAS criteria, or safeguarding requirements change. Equality objectives are published and progress is reported to the Proprietor annually. The policy review process includes consultation with staff, learners, and families to ensure it remains relevant and effective.

Related Policies

This policy should be read alongside: NEO Child Protection and Safeguarding Policy NEO Online Safety and Acceptable Use Policy NEO Behaviour and Regulation Policy NEO SEND Policy NEO Teaching and Learning Policy NEO Data Protection, Confidentiality and Privacy Policy NEO Complaints Procedure NEO Admissions Policy NEO Staff Code of Conduct (in development) NEO Home-School Agreement

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