Equality, Diversity and Inclusion Policy

Last updated 21 August 2026

Organisation: Nested Learning Ltd
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Review: At least annually, and sooner where there is a material change in law, working arrangements, services or risk.

1. Purpose
   Nested Learning is committed to fair treatment, dignity, respect and equality of opportunity in our workplace, services, products and business relationships.
   We want people to be able to work with us, learn through our services and engage with our organisation without unlawful discrimination, harassment or victimisation.
   Equality does not always mean treating everybody identically. People can have different needs, barriers and circumstances. Fair treatment may therefore require reasonable adjustments, accessible alternatives or proportionate changes to the way a service or process operates.
2. Who this policy covers
   This policy applies to:
   employees, workers, contractors, consultants and applicants;
   learners and users of Nested Learning services;
   customers and prospective customers;
   suppliers, partners and other third parties acting for or with Nested Learning; and
   people affected by decisions, processes or services within our control.
3. Our commitment
   Nested Learning will seek to:
   prevent unlawful discrimination, harassment and victimisation;
   provide fair access to employment, development and services;
   make reasonable adjustments for disabled people where the legal duty applies;
   design processes and digital services with accessibility and inclusion in mind;
   challenge bullying, harassment and prejudicial behaviour;
   consider equality impacts when making material decisions;
   respond promptly and fairly to concerns;

use recruitment and selection criteria that are relevant to the role;
support an inclusive working and learning environment; and
review evidence, feedback and complaints to identify avoidable barriers or unequal outcomes.

We also seek to treat people fairly in relation to characteristics and circumstances not always covered by the Equality Act 2010, such as caring responsibilities, care experience, socio-economic background and language, where doing so is reasonable and lawful.

4. Legal framework

   The principal legislation is the Equality Act 2010.

   It protects people against unlawful discrimination in employment and in the provision of services. Depending on the context, the protected characteristics are:
   age;
   disability;
   gender reassignment;
   marriage and civil partnership;
   pregnancy and maternity;
   race;
   religion or belief;
   sex; and
   sexual orientation.

   The Act prohibits forms of unlawful treatment including direct discrimination, indirect discrimination, harassment and victimisation. It also creates duties to make reasonable adjustments for disabled people in relevant circumstances.

   Nested Learning will comply with these duties where they apply.

5. Public-sector equality principles

   Nested Learning is a private company and does not claim that the Public Sector Equality Duty automatically applies to all of its activities.

   Where Nested Learning performs a public function, acts under arrangements that carry public-sector equality obligations, or is contractually required to meet particular equality standards, it will comply with the relevant requirements.

   More generally, we regard the three core public-sector equality principles as useful standards for good decision-making:
   eliminating unlawful discrimination, harassment and victimisation;
   advancing equality of opportunity; and
   fostering good relations between different groups.

   This enables Nested Learning to work effectively with schools, colleges, universities, local authorities and other public or regulated bodies without misrepresenting our own legal status.

6. Reasonable adjustments and accessibility
   Where the Equality Act requires a reasonable adjustment, Nested Learning will make one unless the proposed adjustment is not reasonable in the circumstances.
   Adjustments may include changes to:
   recruitment or assessment processes;
   working arrangements;
   communications and document formats;
   technology or equipment;
   the way a service is accessed; or
   policies, procedures or support arrangements.
   For digital services, accessibility should be considered during design and development rather than only after a barrier has been reported.
   We will not charge a disabled person for an adjustment where the law prohibits doing so.
7. Recruitment, employment and progression
   Employment decisions should be based on relevant skills, capability, conduct, performance and legitimate business requirements.
   Nested Learning will not knowingly apply criteria that unlawfully disadvantage a protected group.
   Where positive action is lawful and appropriate, it may be considered to address disadvantage, under-representation or different needs. Positive action is not the same as unlawful positive discrimination.
8. Harassment, bullying and sexual harassment
   Bullying, harassment and sexual harassment are not acceptable.
   At the date of this policy, the Worker Protection (Amendment of Equality Act 2010) Act 2023 requires employers to take reasonable steps to prevent sexual harassment of employees.
   The Employment Rights Act 2025 is due to strengthen this requirement from 30 October 2026, including a requirement to take all reasonable steps to prevent sexual harassment and new protection in relation to third-party harassment.
   Nested Learning adopts the stronger preventive approach in this policy in advance of that commencement date. We will consider foreseeable risks, working arrangements, reporting routes, training, culture and third-party interactions rather than waiting for a complaint before acting.
9. Learners, customers and service delivery
   Nested Learning will seek to provide services that are fair, respectful and accessible.
   We will not knowingly design or apply a rule, feature or process that unlawfully discriminates against users.
   Where user needs differ, we will consider reasonable and proportionate ways of reducing barriers. This can include accessible formats, alternative processes or

adjustments to how an activity is delivered.

Educational technology should support human diversity rather than assume that every learner communicates, studies or demonstrates understanding in the same way.

10. Data and automated systems

    Equality-related data may be particularly sensitive. Where Nested Learning collects or uses personal data for equality monitoring, reasonable adjustments or support, it will do so in accordance with applicable data-protection law.

    Automated or AI-assisted systems must not be treated as a justification for unlawful discrimination.

    Where an automated process materially affects access, assessment, support or another significant outcome, Nested Learning will seek to understand relevant risks and provide appropriate human oversight where required.

11. Raising a concern

    Anyone who believes they have experienced or witnessed discrimination, harassment, victimisation or an avoidable equality barrier should raise the matter promptly through the contact route published by Nested Learning or, for workers, through the appropriate internal route.

    Reports will be handled as fairly, sensitively and confidentially as the circumstances permit.

    No person should be subjected to retaliation for raising a genuine concern or supporting another person who does so.

    Safeguarding concerns should be raised under the separate Safeguarding Policy.

12. Responsibilities

    Everyone working for or on behalf of Nested Learning is expected to:

    treat others with dignity and respect;

    avoid discriminatory or harassing conduct;

    consider reasonable adjustments and accessibility;

    challenge inappropriate behaviour where safe and appropriate;

    report serious concerns; and

    co-operate with investigations and corrective action.

    Senior leadership is responsible for ensuring that this policy is reflected in relevant decisions, systems and working arrangements.

13. Relationship between this policy and the law

    Nested Learning seeks to work within the confines of this policy where reasonable and legally necessary.

    That wording does not make legal compliance optional.

    Where the law imposes a duty, the law takes precedence. Where the law itself uses a

test of reasonableness or proportionality, Nested Learning will apply that test properly and in the circumstances of the individual case.

14. Review

    This policy will be reviewed at least annually and sooner where there is:

    a material change in equality law or statutory guidance;

    a significant complaint or incident;

    evidence of an avoidable barrier or unequal outcome; or

    a material change to Nested Learning's services, workforce or operating model.