

Equal Opportunities and Diversity Policy

Purpose

This policy outlines Master Class Education's commitment to creating an inclusive, respectful, and fair environment where all individuals have equal access to opportunities and are free from discrimination. We actively work to eliminate discrimination and promote equity across all aspects of employment and service delivery, regardless of personal characteristics or background. Our goal is to foster a culture where diversity is valued, every voice is heard, and everyone can thrive.

All employees, including full-time, part-time, and internal temporary staff, are subject to this policy.

Promoting Equal Opportunities and Eliminating Discrimination

Master Class Education embraces diversity and aims to promote the benefits of diversity in all of our business activities. We seek to develop a business culture that reflects that belief. We will expand the media in which we recruit to ensure that we have a diverse employee and candidate base. We will also strive to ensure that our clients meet their own diversity targets.

Master Class Education is committed to diversity and will promote diversity and equal opportunities for all employees, workers and applicants. We will continuously review all aspects of recruitment to avoid unlawful discrimination. Master Class Education will treat everyone equally and will not discriminate on the grounds of an individual's "protected characteristic" under the Equality Act 2010 (the Act) which are age, disability, gender re-assignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. We will not discriminate on the grounds of an individual's membership or non-membership of a Trade Union. All staff have an obligation to respect and comply with this policy.

Master Class Education is committed to providing training for its entire staff in equal opportunities and diversity. Master Class Education will avoid stipulating unnecessary requirements which will exclude a higher proportion of a particular group of people and will not prescribe discriminatory requirements for a role.

Master Class Education will not discriminate unlawfully when deciding which candidate/temporary worker is submitted for a vacancy or assignment, or in any terms of employment or terms of engagement for temporary workers. Master Class Education will ensure that each candidate is assessed in accordance with the candidate's merits, qualifications and ability to perform the relevant duties for the role.

We are dedicated to ensuring that all individuals have equal access to employment and advancement within our organisation. Decisions about recruitment, promotion, training, and other workplace matters are made based on merit, skills, and experience, and are free from bias or prejudice. We aim to create a working environment where fairness is a guiding principle, and everyone is empowered to reach their full potential.

Discrimination

Under the Act unlawful discrimination occurs in the following circumstances:

Direct discrimination

Direct discrimination occurs when an individual is treated less favourably because of a protected characteristic. Treating someone less favourably means treating them badly in comparison to others that

do not have that protected characteristic.

Direct discrimination can take place even if the individual does not have the protected characteristic but is treated less favourably because it is assumed they have the protected characteristic or is associated with someone that has the protected characteristic.

Direct discrimination would also occur if a recruitment consultancy accepted and acted upon instructions from an employer which states that certain persons are unacceptable due to a protected characteristic, unless an exception applies. The Act contains provisions that permit specifying a requirement that an individual must have a protected characteristic in order to undertake a job. These provisions are referred to as occupational requirements.

Where there is an occupational requirement then the client must show that applying the requirement is a proportionate means of achieving a legitimate aim, i.e. the employer must be able to objectively justify applying the requirement. An occupational requirement does not allow an employer to employ someone on less favourable terms or to subject a person to any other detriment. Neither does an occupational requirement provide an excuse against harassment or victimisation of someone who does not have the occupational requirement.

Indirect discrimination

Indirect discrimination occurs when a provision, criterion or practice (PCP) is applied but this results in people who share a protected characteristic being placed at a disadvantage in comparison to those who do not have the protected characteristic. If the PCP can be objectively justified it will not amount to discrimination.

Indirect discrimination would also occur if a recruitment consultant accepted and acted upon an indirectly discriminatory instruction from an employer.

If the vacancy requires characteristics which amount to an occupational requirement or the instruction is discriminatory but there is an objective justification, Master Class Education will not proceed with the vacancy unless the client provides written confirmation of the occupational requirement, exception or justification.

Master Class Education will use best endeavours to comply with the Act and will not accept instructions from clients that will result in unlawful discrimination.

Harassment

Under the Act, harassment is defined as unwanted conduct that relates to a protected characteristic which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual. This includes unwanted conduct of a sexual nature.

Master Class Education is committed to providing a work environment free from unlawful harassment. Master Class Education will ensure that the consultants do not harass any individual.

Examples of prohibited harassment are:

1. verbal or written conduct containing derogatory jokes or comments;
2. slurs or unwanted sexual advances;
3. visual conduct such as derogatory or sexually orientated posters;
4. photographs, cartoons, drawings or gestures which some may find offensive;
5. physical conduct such as assault, unwanted touching, or any interference because of sex, race or any other protected characteristic basis;
6. threats and demands to submit to sexual requests as a condition of continued employment or to avoid some other loss, and offers of employment benefits in return for sexual favours;
7. retaliation for having reported or threatened to report harassment.

If an individual believes that they have been unlawfully harassed, they should make an immediate report to HR Manager followed by a written complaint as soon as possible after the incident. The details of the complaint should include:

- Details of the incident
- Name(s) of the individual(s) involved
- Name(s) of any witness(es)

Master Class Education will undertake a thorough investigation of the allegations. If it is concluded that harassment has occurred, remedial action will be taken.

All employees and workers will be expected to comply with Master Class Education's policy on harassment in the workplace. Any breach of such a policy will lead to the appropriate disciplinary action.

Any individual who Master Class Education finds to be responsible for harassment will be subject to the disciplinary procedure and the sanction may include termination.

Victimisation

Under the Act, victimisation occurs when an individual is treated unfavourably because he/she has done a 'protected act' which is bringing a claim for unlawful discrimination or raising a grievance about discrimination or giving evidence in respect of a complaint about discrimination.

Master Class Education will ensure that the consultants do not victimise any individual.

Disabled Persons

Discrimination occurs when a person is treated unfavourably as a result of their disability.

In direct discrimination occurs where a provision, criterion or practice is applied by or on behalf of an employer, or any physical feature of the employer's premises, places a disabled person at a substantial disadvantage in comparison with persons who are not disabled.

In recruitment and selection there may be a requirement to make reasonable adjustments. For example, it might be necessary to have different application procedures for partially sighted or blind applicants that enable them to use Braille. With testing and assessment methods and procedures, tests can only be justified if they are directly related to the skills and competencies required for the job. Even then, it might be appropriate to have different levels of acceptable test results, depending on the disability. For example, an applicant with a learning disability might need more time to complete a test, or not be expected to reach the same standard as other non-disabled applicants.

Reasonable adjustments in recruiting could include:

- modifying testing and assessment procedures;
- meeting the candidate at alternative premises which are more easily accessible;
- having flexibility in the timing of interviews;
- modifying application procedures and application forms;

- providing a reader or interpreter.

Wherever possible Master Class Education will make reasonable adjustments to hallways, passages and doors in order to provide and improve means of access for disabled employees and workers. However, this may not always be feasible, due to circumstances creating such difficulties as to render such adjustments as being beyond what is reasonable in all the circumstances.

Master Class Education will not discriminate against a disabled person:

- in the arrangements i.e. application form, interview or arrangements for selection for determining whom a job should be offered; or
- in the terms on which employment or engagement of temporary workers is offered; or
- by refusing to offer, or deliberately not offering the disabled person a job for reasons connected with their disability; or
- in the opportunities afforded to the person for receiving any benefit, or by refusing to afford, or deliberately not affording him or her any such opportunity; or
- by subjecting the individual to any other detriment (detriment will include refusal of training or transfer, demotion, reduction of wage, or harassment).

Master Class Education will make career opportunities available to all people with disabilities and every practical effort will be made to provide for the needs of staff, candidates and clients.

Age Discrimination

Under the Act, it is unlawful to directly or indirectly discriminate against or to harass or victimise a person because of age. Age discrimination does not just provide protection for people who are older or younger. People of all ages are protected.

A reference to age is a reference to a person's age group. People who share the protected characteristic of age are people who are in the same age group.

Master Class Education will not discriminate directly or indirectly, harass or victimise any person on the grounds of their age. We will encourage clients not to include any age criteria in job specifications and every attempt will be made to encourage clients to recruit on the basis of competence and skills and not age.

Master Class Education is committed to recruiting and retaining employees whose skills, experience, and attitude are suitable for the requirements of the various positions regardless of age. No age requirements will be stated in any job advertisements on behalf of the company.

If Master Class Education requests age as part of its recruitment process such information will not be used as selection, training or promotion criteria or in any detrimental way and is only for compilation of personal data, which the company holds on all employees and workers and as part of its equal opportunities monitoring process. In addition if under age 22 to adhere to Conduct of Employment Agencies and Employment Business Regulations 2003 and other relevant legislation applicable to children or young candidates.

Where a client requests age or date of birth, this will have to be under an occupational requirement or with an objective justification which should be confirmed in writing.

Part-Time Workers.

This policy also covers the treatment of those employees and workers who work on a part-time basis, Master Class Education recognises that it is an essential part of this policy that part time employees are treated on the same terms, with no detriment, as full time employees (albeit on a pro rata basis) in matters such as rates of pay, holiday entitlement, maternity leave, parental and domestic incident leave and access to our pension scheme. Master Class Education also recognises that part time employees must be treated the same as full time employees in relation to training and redundancy situations.

Gender Reassignment

Master Class Education recognises that any employee or worker may wish to change their gender during the course of their employment with the Company.

Master Class Education will support any employee or worker through the reassignment.

Master Class Education will make every effort to try to protect an employee or worker who has undergone, is undergoing or intends to undergo gender reassignment, from discrimination or harassment within the workplace.

Where an employee is engaged in work where the gender change imposes genuine problems Master Class Education will make every effort to reassign the employee or worker to an alternative role in the Company, if so desired by the employee.

Any employee or worker suffering discrimination on the grounds of gender reassignment should have recourse to the Company's grievance procedure.

Recruitment Of Ex-Offenders

Where Master Class Education has registered with the Disclosure and Barring Service (DBS) and has the authority to apply for criminal records checks on individual because they are working with children or vulnerable adults or both, we will comply with the DBS's Code of Practice which includes having a policy on the recruitment of ex-

offenders.

Enhanced Sexual Harassment Prevention Duty

Master Class Education is committed to taking *all reasonable steps* to prevent sexual harassment in the workplace, in line with legal requirements. This strengthened duty places a proactive obligation on employers to implement robust preventative measures to protect all employees, workers, and applicants from sexual harassment before it occurs.

To fulfil this duty, Master Class Education will:

1. Conduct regular risk assessments to identify environments, roles, or practices where sexual harassment risks may be heightened.
2. Deliver mandatory and recurring training for all staff, managers, and leaders on recognising, preventing, and appropriately responding to sexual harassment.
3. Ensure that policies, reporting channels, and disciplinary procedures relating to sexual harassment are clear, accessible, confidential, and routinely updated.
4. Promote a culture of respect and zero tolerance, empowering staff to report concerns early without fear of victimisation.
5. Monitor and review all reported incidents, outcomes, and patterns to ensure preventative measures remain effective and aligned with current legislation.

Master Class Education recognises that preventing sexual harassment is an ongoing responsibility and will continue to evaluate and enhance its practices as further guidance and legal standards evolve.

How this policy is communicated to staff

Our commitment to Diversity & Equal Opportunities is embedded across all aspects of our employment practices. Clear instructions setting out this policy are issued to individuals involved in recruitment, selection, remuneration, training, and promotion. These measures ensure recruitment and selection procedures are designed to eliminate bias and encourage diversity; pay structures are regularly reviewed to promote fairness; training opportunities are made equally accessible to all staff; and promotion decisions are governed by transparent, merit-based criteria. To ensure all relevant personnel are fully informed, the policy is distributed during induction, reinforced through compulsory equality and diversity training, and made readily accessible via internal resources such as the staff handbook and HR portal. Regular briefings and refresher sessions are held to sustain awareness and embed inclusive practices throughout the organisation.

Reporting Acts of Discrimination and Breaches of Equal Opportunities

At Master Class Education, we are committed to providing clear, confidential, and accessible reporting channels for anyone experiencing or witnessing discrimination or any breach of our Equal Opportunities Policy. We encourage staff to speak up without fear of retaliation, ensuring that every concern is handled with sensitivity, professionalism, and urgency.

- **Confidential Reporting:** Employees can report incidents through secure and discreet channels, with full assurance their privacy will be respected throughout the process.
- **Dedicated Support Team:** Complaints will be handled by HR professionals trained to manage discrimination concerns with empathy, discretion, and impartiality.
- **Multiple Reporting Options:** Staff may report concerns directly to HR, via their line manager, or through our wellbeing officer.
- **Clear Process & Follow-Up:** All reports will be assessed promptly and managed through a structured investigation process, with regular updates provided to the affected individuals.

Investigation and Resolution Process

All allegations related to discrimination and breaches of Equal Opportunities are taken seriously and will be investigated promptly, thoroughly, and confidentially.

Investigations are led by HR representatives trained to ensure fairness, impartiality, and respect for all involved. The procedure includes:

Initial Report & Documentation

- Formal recording of the complaint via HR, management, or an appropriate reporting channel.
- Documenting all relevant details, including dates, times, witnesses, and context.

Initial Assessment

- Evaluating the nature and severity of the complaint.
- Determining whether an informal resolution is viable or a formal investigation is required.

Investigation Process

- Assigning an impartial investigator or HR lead.
- Collecting evidence (emails, documents, witness accounts).
- Conducting interviews with all involved parties while maintaining confidentiality.

Review & Decision Making

- Analysing all evidence objectively to determine the likelihood of a breach.
- Assessing whether the incident contravenes internal policy or legal standards.
- Making a fair and proportionate decision based on findings.

Action & Resolution

- Where a breach is confirmed, applying disciplinary measures as outlined in our disciplinary policy.
- If no breach is found, communicating the outcome clearly and closing the case

with support.

Follow-Up & Remedial Actions

- Communicating outcomes respectfully while maintaining confidentiality.
- Reviewing workplace policies and delivering targeted training if required.
- Reinforcing a culture of equality, respect, and inclusion across the organisation.

If discrimination is confirmed, disciplinary action may include formal warnings, remedial training, suspension, or dismissal—depending on the nature and severity of the breach. Refer to our disciplinary policy for detailed guidance.

Retaliation against any employee who reports discrimination or participates in an investigation is strictly prohibited. Additional disciplinary action will apply to individuals found to have engaged in retaliatory behaviour, unless the initial complaint is deemed to be malicious.

Employee Rights and Support

Master Class Education is committed to ensuring all employees feel safe and supported when reporting concerns. Retaliation against complainants or witnesses is unacceptable and will result in disciplinary action. Staff affected by discriminatory conduct will have access to free counselling services and

mediation support to assist throughout the process.

By reinforcing these protections, we foster a work environment where individuals can speak up with confidence, knowing their concerns will be heard, respected, and addressed fairly.

Preventative Measures and Training

Prevention is key to maintaining an inclusive and discrimination-free workplace. We provide regular training to all staff on equality, diversity, and appropriate conduct in accordance with our Equal Opportunities Policy. We promote a culture that empowers employees to challenge inappropriate behaviours and uphold our values of fairness, dignity, and respect.

Responsibilities of Management and Employees

Creating an inclusive and respectful workplace is a shared responsibility. Managers and senior leaders are expected to model these principles, respond to concerns effectively, and ensure all employees understand their rights and obligations.

Employees are likewise encouraged to contribute to a culture of mutual respect by speaking up against discrimination and supporting those affected.

Record Keeping and Confidentiality

All upheld complaints will be recorded on the employee's personnel file, in line with

our disciplinary procedures. Unsubstantiated cases will be kept securely for one year from the date of the most recent related allegation, allowing for monitoring of any recurring patterns. All personal information will be handled confidentially and stored in accordance with data protection regulations.

Policy Review and Updates

We are committed to regularly reviewing and updating our Equal Opportunities and Discrimination Policy, at least annually, to ensure it reflects current legislation and best practice. Any revisions will be communicated clearly to all staff.