



INDEPENDENT HORIZONS LIMITED

EQUALITY, DIVERSITY AND INCLUSION POLICY AND PROCEDURE

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YOUR RIGHT TO BE RESPECTED AND INCLUDED

A guide for young people aged 16–17 living at Independent Horizons

You have the right to be yourself, be treated with respect and tell us if something does not feel fair.

You matter, just as you are

At Nelson House, you should feel safe, welcomed, respected and included.

You have the right to be treated fairly, whatever your background, identity, beliefs, abilities or experiences.

You can describe who you are in your own way. You can tell us what is important to you and what helps you feel comfortable and respected.

Our Team Members should listen to you and not make assumptions about you because of your culture, religion, disability, gender, sexuality, family background or anything else about your life.

We can help make things easier

Sometimes something might make it harder for you to understand information, join activities, access support or feel comfortable.

You can tell us what is difficult and ask for help or reasonable adjustments.

This might mean explaining things differently, making information easier to understand, changing an arrangement or finding another way to support you.

We will listen to your views and consider what can reasonably be done.

You can speak up

If you experience racism, sexism, homophobia, transphobia, ableism, discrimination about your religion or beliefs, bullying or any other unfair or hurtful treatment, please tell someone.

You can also speak up if you feel excluded, misunderstood or uncomfortable about how you have been treated.

You will not get into trouble for raising a concern or making a complaint.

You can talk to:

- any Team Member you trust;
- Michael Robinson, House Manager;
- Karen Burton, Registered Service Manager;
- your social worker;
- an advocate;
- or another appropriate person through our complaints arrangements.

If your concern involves Karen, Gary or another manager, we will make sure it follows an appropriate route that avoids conflicts of interest. You will not be expected to rely on the person you are concerned about to investigate your complaint.

What happens if you tell us something?

We will listen, take your concern seriously and consider what needs to happen.

We will respect your privacy. Sometimes, if you or somebody else may be unsafe, we will need to share information with your social worker or other professionals who can help keep people safe.

We will explain this to you where it is appropriate and safe to do so.

You can ask questions, tell us what you would like to happen and request support from an advocate or another trusted person.

Your views help make Nelson House better

We want to know what helps you feel respected, included and safe.

You do not have to agree with everything adults say, and you do not have to share personal information about your identity unless there is an appropriate reason.

Your identity, your experiences and your views matter.

1. PURPOSE AND SAFEGUARDING RATIONALE

Independent Horizons is committed to providing safe, respectful and inclusive supported accommodation for looked-after children and care leavers aged 16 and 17.

Every young person should experience Nelson House as a home where they are valued, treated fairly, listened to and supported to develop their independence without discrimination, prejudice, bullying or unnecessary barriers.

Young people living in supported accommodation may have experienced trauma, disrupted relationships, discrimination, rejection, exclusion or disadvantage. Some may have felt misunderstood or judged because of their background, identity, circumstances or experiences.

These experiences can affect a young person's trust in adults, emotional wellbeing, sense of belonging, confidence and willingness to seek support.

Independent Horizons recognises that equality, diversity and inclusion are therefore not simply organisational values. They are closely connected to safeguarding, emotional safety, individual support, placement stability and preparation for adulthood.

This policy establishes how Independent Horizons will:

- promote equality, dignity and respect;
- recognise, respect and respond to individual identity and difference;
- identify and address discrimination, prejudice, bullying and identity-based harm;
- remove barriers and make reasonable adjustments where required;
- support young people to participate meaningfully in decisions affecting them;
- consider equality and compatibility during referral, matching and placement planning;
- respond appropriately when discrimination or exclusion occurs;
- provide clear recording, reporting and escalation arrangements;
- support Team Members to develop inclusive and anti-discriminatory practice;
- and review whether young people experience the accommodation and support as safe, accessible and inclusive.

Independent Horizons uses a relationship-based, trauma-responsive and child-centred approach.

Team Members must remain curious about a young person's individual experiences and avoid making assumptions based on labels, behaviour, background or identity.

Our approach is to ask, listen, understand and assess the individual young person.

Understanding someone's circumstances does not mean overlooking unsafe or discriminatory behaviour. Independent Horizons will maintain clear, respectful boundaries while supporting young people to learn, develop positive relationships and take increasing responsibility for their choices.

2. SCOPE AND ORGANISATIONAL COMMITMENTS

2.1 Scope

This policy applies to equality, diversity, inclusion and anti-discriminatory practice within the accommodation and support provided by Independent Horizons.

It principally concerns the experiences, rights, needs and safeguarding of young people.

It also establishes expectations for the conduct and practice of everyone working for or on behalf of Independent Horizons, including:

- Directors;
- the Registered Service Manager;

- the House Manager;
- the Clinical Adviser when undertaking an agreed function;
- Support Workers and Bank Support Workers;
- agency workers;
- volunteers;
- contractors and other professionals acting on behalf of the organisation.

The policy applies to support delivered at Nelson House, during activities and appointments in the community, through electronic communication, during transport and in other situations where Independent Horizons is providing support.

Its principles also apply to any young person remaining under an agreed transitional placement arrangement beyond their 18th birthday, consistent with the Statement of Purpose.

Employment-specific equality, recruitment, grievance and disciplinary procedures are addressed through the relevant Independent Horizons workforce policies. They are not duplicated in full here.

2.2 Organisational Commitments

Independent Horizons will:

- Treat young people fairly, respectfully and as individuals.
- Promote a home environment free from discrimination, intimidation, harassment and identity-based harm.
- Recognise that young people may have different needs, experiences, identities and communication preferences.
- Avoid making assumptions about a young person because of their background or personal characteristics.
- Consider reasonable adjustments and other practical measures to remove barriers.
- Encourage young people to understand, express and develop their own identity.
- Provide opportunities for young people to participate in decisions affecting their support and home.
- Challenge discriminatory behaviour appropriately, including behaviour by Team Members, other young people and relevant third parties.
- Take safeguarding action where discrimination or exclusion creates actual or possible harm.
- Ensure young people can raise concerns without fear of punishment, withdrawal of support or retaliation.
- Record, review and learn from concerns, complaints and feedback.
- Promote an inclusive, reflective and professionally accountable organisational culture.

Equality does not always mean treating everyone identically.

Young people may require different information, resources, adjustments or approaches to achieve fair and meaningful access to support.

3. LEGISLATIVE AND REGULATORY FRAMEWORK

This policy has been developed with reference to the legal and regulatory framework applicable to Independent Horizons as an Ofsted-registered supported-accommodation provider in England.

3.1 Legislation and Statutory Requirements

Legislation or regulation	Relevance to this policy
Equality Act 2010	Applicable protections against discrimination, harassment and victimisation, together with duties concerning reasonable adjustments.
Human Rights Act 1998	Relevant principles concerning dignity, privacy, family life, freedom of thought, conscience and religion, and non-discrimination in the enjoyment of Convention rights. Direct statutory duties depend on the function being exercised.
Children Act 1989	Safeguarding, children's welfare, care planning and responsibilities relating to looked-after children.
Children Act 2004	Safeguarding and partnership-working responsibilities.
Children and Social Work Act 2017	Relevant children's social-care and leaving-care responsibilities.
Supported Accommodation (England) Regulations 2023 — Regulations 4–7	Leadership and management, protection, accommodation and support Quality Standards.
Regulation 9	Statement of Purpose requirements, including relevant anti-discriminatory arrangements.
Regulations 20–22	Safeguarding, missing young people and behaviour-management arrangements.
Regulations 24–26	Case records, other records and secure information management.
Regulation 27	Notification of specified serious events.
Regulation 31	Complaints, representations, impartial consideration, records and protection against reprisals.
Regulation 32	Monitoring and reviewing the quality of support at least every six months.
Data Protection Act 2018 and UK GDPR	Lawful, necessary, proportionate and secure handling of personal information.

The Equality Act applies differently to services, premises, employment and other activities. Its duties and exceptions must be considered according to the particular circumstances.

The Human Rights Act places direct duties on public authorities and those exercising relevant public functions. Independent Horizons will respect human-rights principles throughout its work without assuming that every activity it undertakes is automatically a public function.

3.2 Statutory Guidance and Regulatory Expectations

Independent Horizons will have regard to the relevant:

- Department for Education *Guide to the Supported Accommodation Regulations including Quality Standards*;
- *Working Together to Safeguard Children 2026*;

- Ofsted *Social Care Common Inspection Framework: Supported Accommodation for Looked-After Children and Care Leavers Aged 16 and 17*;
- Equality and Human Rights Commission *Code of Practice for Services, Public Functions and Associations 2026*;
- and other applicable statutory guidance.

The DfE Guide supports the interpretation and implementation of supported-accommodation regulations.

The Ofsted inspection framework considers young people's experiences, safety, outcomes and the effectiveness of leadership and support.

The EHRC statutory Code assists with understanding and applying the Equality Act. It does not itself create additional legal obligations.

3.3 Independent Horizons Organisational Standards

Independent Horizons may establish standards of respect, inclusion and support that go beyond the minimum required by legislation.

These are organisational expectations, not automatically separate statutory duties.

The organisation's chosen standards include individualised, trauma-responsive support, meaningful participation, reflective practice and active challenge to discriminatory behaviour.

Contract-specific requirements may also apply to particular placements and must be considered separately.

4. EQUALITY, DIVERSITY, INCLUSION AND DISCRIMINATION

4.1 Equality

Equality means promoting fair treatment, removing unnecessary barriers and ensuring that individuals have meaningful opportunities to access support, protection and participation.

It does not require every young person to receive exactly the same response or resources regardless of need.

4.2 Diversity

Diversity means recognising, respecting and valuing differences between people.

These may relate to identity, culture, experience, circumstances, beliefs, abilities, communication, relationships and background.

4.3 Inclusion

Inclusion means actively creating an environment where young people feel respected, listened to, safe to express themselves and able to participate in everyday life and decisions affecting them.

Inclusion requires action rather than simply an absence of overt discrimination.

4.4 Protected Characteristics Under the Equality Act 2010

The Equality Act 2010 identifies nine protected characteristics:

- Age.
- Disability.
- Gender reassignment.
- Marriage and civil partnership.
- Pregnancy and maternity.
- Race.

- Religion or belief.
- Sex.
- Sexual orientation.

The legal protections associated with these characteristics vary depending on the activity concerned.

For example, Part 3 of the Equality Act, which addresses services and public functions, does not provide age-discrimination protection for people under 18 or protection on grounds of marriage and civil partnership. Different provisions may apply in other contexts.

For Equality Act purposes, sex is interpreted in accordance with the Supreme Court judgment of April 2025 and the current EHRC guidance. The statutory meanings of sex and gender reassignment are distinct.

The legal protection relating to gender reassignment continues to apply to people who meet the statutory definition, including young people. Independent Horizons will respect and safeguard transgender young people and challenge unlawful discrimination.

Any decisions involving sex, gender reassignment, privacy, accommodation suitability or access to facilities must be lawful, individualised and sensitive to the rights, dignity and safety of those affected.

The policy must not be interpreted as authorising blanket exclusion, humiliation or degrading treatment.

4.5 Wider Individual Circumstances

Independent Horizons also recognises that young people may experience exclusion or disadvantage connected with:

- care experience;
- family circumstances and history;
- nationality;
- culture;
- language and literacy;
- communication needs;
- neurodiversity;
- socioeconomic disadvantage;
- housing or placement history;
- gender identity or gender expression;
- appearance;
- physical or emotional health;
- and other important aspects of their identity or lived experience.

These are not all separate protected characteristics under the Equality Act. Some circumstances may, however, fall within existing legal protections, including disability or gender reassignment.

Independent Horizons will consider their relevance to safeguarding, support, dignity and inclusion regardless.

4.6 Forms of Discrimination and Harm

Direct discrimination occurs where someone is treated less favourably because of a protected characteristic, subject to the applicable statutory provisions.

Indirect discrimination may occur where a rule, arrangement or way of working disadvantages people who share a protected characteristic and the arrangement cannot be legally justified.

Harassment involves unwanted conduct meeting the relevant legal definition, including conduct connected to applicable protected characteristics or conduct of a sexual nature that violates dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment. The statutory rules differ across settings and protected characteristics.

Victimisation means subjecting someone to a detriment because they have done, or are believed to have done or may do, a protected act under the Equality Act, such as making or supporting a discrimination complaint.

Discrimination arising from disability concerns unfavourable treatment because of something arising in consequence of disability, subject to the statutory conditions and possible justification.

Failure to make reasonable adjustments may amount to unlawful disability discrimination where the relevant legal duty applies and reasonable steps have not been taken to address disadvantage.

Prejudice or bias involves assumptions or attitudes that may influence how someone is understood or treated.

Bullying includes harmful, intimidating, humiliating or targeted behaviour. It may be repeated or form part of a pattern, although a single serious incident can also require significant action.

A hate incident is an incident perceived to be motivated by hostility or prejudice connected to an aspect of a person's identity, whether or not a criminal offence has been established.

A hate crime involves a criminal offence with the relevant hostility or prejudice element. The categories recognised in criminal law and police monitoring are not identical to the Equality Act's nine protected characteristics.

Team Members must not assume that every hurtful or discriminatory statement automatically constitutes a crime.

Equally, behaviour must not be dismissed simply because it does not clearly meet a criminal or Equality Act legal definition.

Independent Horizons will respond to harmful, discriminatory and degrading behaviour in accordance with its organisational standards, safeguarding responsibilities and relevant procedures.

5. IDENTITY, DIGNITY AND INDIVIDUAL NEEDS

5.1 Understanding the Individual Young Person

Independent Horizons recognises that every young person has their own identity, experiences, wishes, strengths and support needs.

Team Members must not assume that a young person's beliefs, preferences, abilities, relationships or support needs can be determined from their:

- ethnicity or nationality;
- religion or culture;
- disability or diagnosis;
- sex or gender identity;
- sexual orientation;
- family background;
- neurodiversity;
- appearance;
- or previous experiences.

Team Members should use respectful conversation, professional curiosity and individual assessment.

Young people should be supported to describe:

- how they identify and wish to be addressed;
- what matters to them;
- their cultural or religious practices, if relevant;
- what helps them feel safe and included;
- any communication or accessibility needs;
- what support they would find helpful;
- and any concerns about discrimination or exclusion.

Young people must not be pressured to disclose personal information about their identity or experiences where there is no appropriate reason to request it.

A young person's reluctance to discuss an aspect of their identity must not automatically be interpreted as resistance, lack of engagement or unwillingness to accept support.

5.2 Trauma-Responsive Practice

Identity, belonging and emotional safety may be affected by previous experiences of rejection, discrimination, abuse, loss or disrupted relationships.

Team Members should consider how these experiences may influence a young person's presentation and response to adults.

They must remain compassionate and curious while maintaining professional boundaries and safeguarding accountability.

Young people should not be defined by trauma, diagnosis, risk or previous behaviour.

5.3 Privacy and Confidentiality

Information about a young person's identity, beliefs, relationships, sexuality, health or personal circumstances must be handled respectfully and confidentially.

Team Members must not unnecessarily disclose sensitive information to other young people, visitors or people who do not have a legitimate reason to receive it.

Where information must be shared for safeguarding, support planning or another lawful purpose, Team Members should explain this to the young person where appropriate and safe.

Information sharing must follow the relevant Independent Horizons confidentiality, safeguarding and data-protection arrangements.

6. ACCESSIBILITY AND REASONABLE ADJUSTMENTS

6.1 Organisational Approach

Independent Horizons recognises that young people may experience barriers to accessing information, accommodation, appointments, activities, education, relationships or meaningful participation.

Some barriers arise from disability, while others relate to language, literacy, communication, culture or individual circumstances.

Independent Horizons will take a proactive, proportionate and individualised approach to identifying and addressing these barriers.

Where a statutory reasonable-adjustment duty applies, Independent Horizons must comply with that duty. Practical consideration of barriers should not depend solely on a young person making a formal request.

6.2 Identifying Barriers and Possible Adjustments

Team Members should consider whether a young person would benefit from:

- information in easy-read or another accessible format;
- visual prompts, reminders or communication aids;
- help understanding written information;
- communication adapted to literacy or neurodevelopmental needs;
- sensory or environmental adjustments;
- adjustments to routines, appointments or activities;
- support to access education, training, employment or community services;
- interpreting or translation;
- adjustments to furniture or room arrangements;
- minor equipment or practical adaptations;
- specialist advice or assessment;
- or changes to how support is provided.

These examples are not exhaustive.

The young person's own wishes and experience must be central to identifying what may help.

An adjustment that works for one person must not automatically be assumed appropriate for somebody else with a similar diagnosis or characteristic.

6.3 Routine and Day-to-Day Adjustments

Routine, low-cost and day-to-day adjustments may be implemented by Team Members or the House Manager within their role where they are:

- safe;
- appropriate;
- consistent with the young person's identified needs;
- within the Team Member's authority;
- and consistent with the relevant Support Plan and Risk Assessment.

Examples may include simplifying written information, using visual prompts, adjusting the pace of a Key Work session or offering a quieter environment for a planned conversation.

Team Members should consult the young person, explain the adjustment where appropriate and ensure that ongoing arrangements are reflected in the relevant records and shared with colleagues who need the information.

Where a Team Member is uncertain about an adjustment or its implications, they should seek guidance from Michael Robinson or Karen Burton.

6.4 Significant or Specialist Adjustments

Where an adjustment is significant, specialist or costly, affects the premises, requires additional resources or has wider operational implications, **Karen Burton, as Registered Service Manager, will oversee the decision.**

Karen will consult, as relevant:

- Gary Burton where there are premises, health and safety, resource, cost or wider operational implications;
- Michael Robinson where day-to-day support or household arrangements are affected;
- the young person, ensuring their wishes and experiences are central;
- the young person's social worker;
- and the placing or accommodating authority, particularly where funding, commissioning, specialist provision or wider planning is required.

Advice may also be sought from relevant health, education, clinical, occupational therapy or other specialist professionals.

Decisions should consider:

- The actual barrier or disadvantage.
- The young person's wishes and individual circumstances.
- The likely effectiveness of the proposed adjustment.
- Practicality, safety and any impact on others.
- Available resources and any required external agreement.
- Whether an alternative reasonable way of meeting the need is available.
- Applicable statutory duties and the consequences of failing to make an adjustment.

Decisions must not be based solely on diagnosis, disability or identity.

Cost, inconvenience or existing arrangements must not be used automatically to reject an adjustment. Whether an adjustment is legally required depends on the applicable statutory duty and the circumstances.

Where there is doubt about a significant legal obligation, management should obtain appropriate professional or legal advice.

6.5 Physical Accessibility at Nelson House

Nelson House is a three-storey shared accommodation property and is not described as universally accessible.

Its physical layout, including access to bedrooms and shower facilities, must be considered when assessing suitability.

Disability or additional needs must not automatically exclude a young person from being considered for accommodation.

Independent Horizons will consider whether reasonable and practicable adjustments can enable safe and appropriate access.

Where limitations to the building cannot reasonably be overcome, the decision must be based on an individual assessment, with appropriate professional and placing-authority involvement, rather than a blanket exclusion.

6.6 Recording and Reviewing Adjustments

Agreed adjustments, including the rationale, responsible person and review arrangements, must be recorded proportionately on **LIEF** and reflected within the relevant Support Plan, Risk Assessment or associated record.

For ongoing adjustments, the record should explain what Team Members need to do consistently.

Where a significant requested adjustment cannot be implemented, the reason, alternatives considered, consultation and any agreed action must be recorded.

The effectiveness of adjustments must be reviewed with the young person and relevant professionals.

Reviews should consider whether the barrier has been reduced, whether the adjustment remains useful and whether anything needs to change.

7. EDI IN REFERRAL, MATCHING AND SUPPORT PLANNING

7.1 Individual Assessment and Matching

Equality, diversity and inclusion are relevant to referral, matching, admission and continuing placement suitability.

Independent Horizons operates Nelson House as Category 2 shared/group-living supported accommodation for young people aged 16 and 17.

Independent Horizons considers mixed-sex placements. It does not operate a blanket single-sex admission rule.

Each referral is considered individually, taking account of whether Independent Horizons can safely and appropriately meet the referred young person's needs and whether the placement is compatible with the safety, dignity and needs of young people already living at Nelson House.

Relevant considerations may include:

- the young person's views, preferences and individual identity;
- the needs and vulnerabilities of current residents;
- sex, privacy and dignity;
- gender reassignment, gender identity and expression;
- culture and religious practices;
- disability and physical accessibility;
- communication and language needs;
- safeguarding and exploitation risk;
- previous or current bullying, harassment or discrimination;
- relationships and group dynamics;
- individual support needs;
- Team Member knowledge, experience and competence;
- and whether additional adjustments, resources or specialist advice are required.

Decisions must be lawful, evidence-based, individualised, proportionate and capable of explanation.

An available bed alone is not sufficient justification for accepting a placement.

Equally, a young person must not be automatically excluded because of a protected characteristic, diagnosis, disability, care experience or identity.

7.2 Privacy, Dignity and Compatibility

Matching decisions must consider the practical implications of shared living.

This may include bedroom privacy, shared facilities, relationships between young people, cultural or religious needs, personal boundaries and safeguarding concerns.

Any identified risk should be understood through appropriate assessment, not stereotypes or assumptions.

Where competing needs or concerns arise, management must consider reasonable ways of addressing them while respecting the safety and rights of everyone affected.

Significant or sensitive decisions should involve the young person, their social worker, the placing or accommodating authority and relevant specialists where appropriate.

7.3 Support Planning and Risk Assessment

Individual Support Plans and Risk Assessments should reflect relevant equality and inclusion needs.

They may include:

- communication preferences;
- cultural or religious needs;
- agreed accessibility arrangements;
- risks relating to bullying or discriminatory harm;

- preferred support approaches;
- practical adjustments;
- community participation;
- and the young person's own views.

Information should only be included where relevant and necessary.

Plans should not label a young person as a risk simply because of their identity or protected characteristics.

Where circumstances or needs change, the relevant plans must be reviewed with the young person and appropriate professionals.

7.4 Contract-Specific Requirements

Some placing-authority or commissioning arrangements may establish additional requirements relating to:

- equality;
- accessibility;
- interpreting or translation;
- reporting;
- equality action plans;
- or specific support arrangements.

Independent Horizons will comply with additional contractual requirements where they apply to the relevant agreement or placement.

These must be considered during referral, matching and placement planning and incorporated into operational arrangements where required.

Requirements contained in a specification that does not apply to the current service or placement must not automatically be presented as universal Independent Horizons requirements.

8. INCLUSIVE EVERYDAY PRACTICE

8.1 Respectful Communication

Team Members must communicate with young people respectfully and without discriminatory, mocking, humiliating or degrading language.

They should consider the young person's preferred form of communication and use language they can understand.

Where appropriate, Team Members should ask how a young person wishes to be addressed rather than making assumptions.

Information about expectations, safety, complaints, rights, appointments and support must be explained accessibly.

A young person should not be disadvantaged because they communicate differently, require additional time or need support understanding information.

8.2 Culture, Religion and Belief

Young people should be supported to maintain and explore cultural, religious and other beliefs that are important to them.

Support may include consideration of:

- religious or cultural observance;
- dietary preferences or requirements;
- clothing;

- religious practice and prayer;
- important celebrations or traditions;
- community connections;
- and access to relevant services or support networks.

Team Members must not assume that someone practises a particular faith or follows particular traditions because of their ethnicity or family background.

Young people also have the right not to practise a religion.

8.3 Relationships, Identity and Belonging

Independent Horizons will support young people to develop healthy relationships and feel a sense of belonging within the home and wider community.

Team Members should encourage respectful relationships, personal boundaries, consent and understanding of difference.

Young people should be supported to explore matters of identity at their own pace.

Team Members must not impose personal beliefs about sexuality, gender, religion or relationships upon young people.

Safeguarding concerns must be considered appropriately, without confusing a young person's identity with risk.

8.4 Education, Employment and Community Inclusion

Young people should be supported to participate in education, employment, training, leisure and community opportunities relevant to their aspirations and needs.

Where barriers or discriminatory treatment are identified, Team Members should help the young person understand their options, express concerns and access appropriate advocacy or professional support.

Where a concern relates to another organisation, Independent Horizons should support the young person to access the relevant complaints or safeguarding route, while addressing any effect upon their wellbeing or safety.

9. PREVENTING AND CHALLENGING DISCRIMINATION

9.1 Expected Conduct

Discriminatory, racist, sexist, homophobic, transphobic, ableist, faith-based or otherwise degrading behaviour is not acceptable within Independent Horizons.

This applies to conduct by Team Members, managers, young people and others involved in the service.

Examples may include:

- derogatory comments or slurs;
- mocking someone's identity, beliefs or disability;
- unwanted sexual or identity-based comments;
- intimidation or threats;
- deliberate exclusion or humiliation;
- discriminatory jokes, messages or online behaviour;
- using someone's private information against them;
- or repeated targeting based on actual or perceived identity.

Team Members must actively model respectful communication and appropriate boundaries.

9.2 Responding to Young People's Behaviour

Where a young person uses discriminatory or harmful language, Team Members should respond calmly, respectfully and proportionately.

They should consider:

- the behaviour and its impact;
- the needs and safety of those affected;
- whether there is an ongoing pattern;
- the young person's understanding and circumstances;
- whether immediate intervention or safeguarding is required;
- and what support or learning may help prevent recurrence.

Team Members must not shame or humiliate a young person.

Understanding why harmful behaviour occurred does not mean accepting it.

Where appropriate, Team Members should explain why the behaviour is harmful, reinforce expectations and offer opportunities for reflection and learning.

The Positive Behaviour Support and Behaviour Management Policy should be followed where behaviour presents additional safety, relationship or placement concerns.

9.3 Restorative Practice

Restorative conversations may be appropriate where they are safe, proportionate and helpful.

They should focus on understanding impact, accountability and learning.

A young person who has experienced discrimination must not be pressured to forgive, reconcile with or meet the person responsible.

Restorative work must never replace necessary safeguarding, complaint or professional-accountability procedures.

9.4 Discrimination by a Team Member or Other Adult

Discriminatory conduct by a Team Member or person working on behalf of Independent Horizons must be taken seriously.

Concerns must be managed through an appropriate unconflicted management, complaints, workforce or safeguarding route.

Where an allegation meets or may meet the threshold for concerns about adults working with children, the Allegations Against a Team Member Policy and relevant LADO procedure must be followed.

Team Members must not independently investigate allegations or confront the person concerned where this could compromise safeguarding or evidence.

10. PROCEDURE: RESPONDING TO EDI CONCERNS

This procedure applies when a Team Member witnesses, receives or becomes aware of possible discrimination, bullying, harassment, exclusion, an accessibility concern or other identity-related harm.

The response must be proportionate to the situation.

Step 1 — Establish Immediate Safety

Assess whether anyone is at immediate risk.

Consider whether:

- a young person needs to be moved to safety;

- intimidation, threats or violence are occurring;
- urgent medical attention is required;
- another person may be at risk;
- additional Team Member or management support is needed;
- or emergency services are required.

Call 999 where there is immediate danger, serious injury, a serious threat to life or other urgent emergency.

Emergency action must not be delayed while waiting for management permission.

Step 2 — Listen to and Support the Young Person

Give the young person time and space to explain what has happened in their own words.

Team Members should:

- listen calmly and without judgement;
- take the concern seriously;
- acknowledge the impact;
- avoid minimising or dismissing the experience;
- ask what immediate support the young person needs;
- avoid making assumptions about intention or responsibility;
- and explain what may need to happen next.

Do not promise absolute confidentiality where information may need to be shared to safeguard someone.

Step 3 — Understand the Concern

Establish sufficient information to decide what action is needed.

This may include:

- what was seen or heard;
- what the young person says happened;
- where and when the concern arose;
- who may have been affected;
- whether the behaviour is continuing;
- and any immediate safety or welfare implications.

Team Members must not conduct inappropriate investigative questioning or ask the young person to repeat a disclosure unnecessarily.

Where the concern may involve abuse or an allegation about an adult, follow the relevant safeguarding or allegations procedure.

Step 4 — Identify the Appropriate Response

Consider whether the matter involves:

- an ordinary discriminatory or inappropriate incident;
- bullying or harassment;
- a complaint about the service;
- a safeguarding concern;
- an allegation about a Team Member or another adult working with children;
- a possible hate incident or criminal offence;
- a workforce grievance;
- or an accessibility or reasonable-adjustment concern.

These categories may overlap.

Team Members are not expected to make complex legal decisions independently.

Where unsure, seek appropriate management or safeguarding advice without delaying urgent action.

Step 5 — Report Through the Correct Route

Report the concern promptly to the appropriate unconflicted manager or professional pathway. Ordinary practice concerns may be discussed with Michael Robinson or Karen Burton where appropriate.

Where the matter constitutes a complaint, follow the Compliments and Complaints Procedure.

Where it concerns an adult working with children and the relevant allegations threshold may be met, follow the Allegations Against a Team Member Policy.

Where Karen Burton, Gary Burton or another person who would ordinarily handle the concern is implicated, use the appropriate unconflicted or independent reporting arrangement.

Do not route a complaint or allegation to someone who would have an actual or perceived conflict of interest in its handling.

Step 6 — Record the Concern

Complete the appropriate **LIEF** record as soon as practicable and in accordance with the relevant procedure.

Depending on the nature of the concern, this may involve:

- an incident record;
- a complaint record;
- a safeguarding record;
- a de-escalation record;
- Key Work or PBS documentation;
- or an appropriate management or support-planning record.

Significant events must not be recorded only in general daily notes where a specialist record is required.

Records must distinguish facts, reported information, the young person's words, professional analysis, decisions, actions and outcomes.

Step 7 — Preserve Relevant Information

Where appropriate, preserve relevant messages, correspondence, images, records or other available evidence securely.

Do not alter or unnecessarily share material.

Team Members must not undertake unauthorised investigative activity.

Step 8 — Consider Safeguarding and External Reporting

Where there is actual or possible harm, follow the Safeguarding Policy.

Where an allegation concerns an adult working with children, consider LADO procedures.

Where a criminal offence may have occurred, consider appropriate police involvement.

Where a Regulation 27 notification criterion may be met, ensure this is escalated promptly so that the appropriate registered-person responsibilities are fulfilled.

Not every discriminatory incident requires an external referral or notification.

Step 9 — Review Individual Plans and Support

Consider whether the concern requires changes to:

- the Support Plan;
- Risk Assessment;
- Positive Behaviour Support Plan;
- safety planning;
- communication arrangements;
- reasonable adjustments;
- or other relevant individual plans.

The young person's wishes and views must be considered.

Step 10 — Address Behaviour and Promote Learning

Where safe and appropriate, consider proportionate educational or restorative work.

This may include discussion about respectful communication, the impact of behaviour, personal responsibility, boundaries and safer ways to manage conflict.

Serious safeguarding concerns or allegations must not be treated as suitable for informal resolution simply because an apology has been offered.

Step 11 — Keep the Young Person Informed

Explain what action has been taken and what will happen next, as far as this can safely and lawfully be shared.

The young person should know who they can speak with and how they can raise further concerns or obtain advocacy.

Step 12 — Review Impact and Continuing Risk

Consider whether the young person now feels safer, whether the behaviour has stopped, whether any adjustments have worked and whether additional support is required.

Where necessary, involve the social worker, placing authority or relevant professionals.

Step 13 — Identify Organisational Learning

Relevant learning should be considered through management oversight, reflective supervision, Team learning, complaints review and quality assurance.

The purpose is to improve young people's experience and prevent avoidable recurrence.

11. SAFEGUARDING, COMPLAINTS AND EXTERNAL ESCALATION

11.1 Relationship with Safeguarding

An EDI concern is not automatically a statutory safeguarding concern.

However, discrimination, targeted abuse, bullying, harassment or exclusion may contribute to emotional harm, physical harm, exploitation, isolation or other safeguarding risk.

Where actual or possible harm is identified, Team Members must follow the Independent Horizons Safeguarding Policy and Procedure.

This includes appropriate contact with the Registered Service Manager or other unconflicted safeguarding route, the young person's social worker, placing or accommodating authority, Children's Social Care, Emergency Duty Team or police where required.

11.2 Complaints and Representations

Young people may raise concerns about discrimination, unfair treatment, accessibility or other aspects of their experience as complaints or representations.

They do not have to describe a concern using the word "complaint" for it to be taken seriously.

Complaints must be handled under the applicable Independent Horizons Compliments and Complaints Policy and Procedure, consistently with Regulation 31 and the approved Statement of Purpose.

The person who is the subject of a complaint must not participate in its consideration or investigation, except for the limited informal-resolution involvement permitted by Regulation 31 where appropriate.

Young people must not experience reprisal or detriment for making a complaint or representation.

11.3 Allegations Against Adults Working with Children

Where an EDI concern includes an allegation that an adult working with children has:

- harmed or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved in a way indicating a possible risk of harm to children;
- or behaved in a way that may indicate unsuitability to work with children,

the Allegations Against a Team Member Policy must be followed.

Where the relevant allegations threshold is met or may be met, the appropriate Local Authority Designated Officer (LADO)/designated officer must be informed without delay and in any event within one working day, in accordance with current local procedures.

Not every discriminatory incident or EDI concern is automatically a LADO matter. The nature of the allegation and the applicable threshold must be considered, and appropriate advice sought where necessary.

The person receiving the disclosure should listen, ensure immediate safety, preserve relevant information, record and report.

They must not independently investigate the allegation.

11.4 Police and Potential Hate Crime

Police involvement must be necessary and proportionate.

Where there is immediate danger or a serious emergency, Team Members must call 999.

Where an offence may have occurred but there is no immediate danger, appropriate advice or reporting should be considered through the relevant management and safeguarding procedure.

Independent Horizons will avoid unnecessary criminalisation of young people while ensuring that threats, violence, serious harassment and other harmful conduct are not minimised.

11.5 Ofsted Notifications

The Registered Service Manager must ensure that relevant events are assessed against Regulation 27 and that required notifications are made without delay.

Not every EDI concern, complaint or discriminatory incident meets a Regulation 27 notification threshold.

Where the Registered Service Manager is implicated or otherwise unable to exercise the relevant function impartially, the organisation must activate the applicable unconflicted safeguarding and governance arrangements and ensure statutory responsibilities are not missed.

11.6 Independent Routes and Conflicts of Interest

Independent Horizons recognises that a complaint or allegation must not be investigated or determined by the person complained about or by someone with an actual or perceived conflict of interest.

For ordinary complaints where she is unconflicted, Karen Burton acts as the management lead in accordance with the current approved complaints arrangements and the governance framework set out in the Statement of Purpose. Once the Compliments and Complaints Policy and Procedure v2 is formally approved and effective, the arrangements within that controlled policy will apply.

Where a complaint concerns Karen Burton, Gary Burton or both Directors, Michael Robinson may receive and coordinate the concern in accordance with the Statement of Purpose and applicable Complaints Procedure.

Michael's role includes securing immediate safety, preserving records and arranging referral through the correct independent pathway. He is not automatically the independent investigator or decision-maker.

Where independent consideration is required, an appropriately experienced and genuinely independent external professional will be appointed under the established IH arrangements.

A complaint concerning Michael Robinson may be referred to Karen Burton where she is unconflicted and the matter falls appropriately within her responsibilities. Otherwise, the relevant independent route must be used.

Where the matter is a safeguarding allegation about an adult, the Allegations Against a Team Member Policy and statutory safeguarding procedures take priority.

Young people and Team Members must also be able to use appropriate external safeguarding, advocacy or whistleblowing routes without first obtaining permission from a person who may be implicated.

11.7 Matters Involving Other Organisations

Where a young person experiences discrimination in education, employment, health services, the community or another organisation, Independent Horizons will consider what support and advocacy may be appropriate.

This may involve supporting the young person to raise a complaint, involving their social worker or seeking specialist advice.

Independent Horizons must continue to consider any resulting safeguarding or emotional wellbeing needs.

12. ROLES, RESPONSIBILITIES AND CONFLICTS OF INTEREST

12.1 Karen Burton — Director / Registered Service Manager / Nominated Individual

Karen has overall responsibility for the implementation, oversight and review of this policy.

Her responsibilities include:

- promoting an inclusive and anti-discriminatory service culture;
- ensuring Team Members understand and implement the policy;
- overseeing significant equality and accessibility decisions;
- ensuring appropriate safeguarding and complaint arrangements;
- considering significant reasonable adjustments and required consultation;
- monitoring relevant incidents, complaints and patterns;
- ensuring appropriate professional and regulatory reporting;

- supporting learning and workforce development;
- and reviewing the effectiveness of inclusive practice through governance and quality assurance.

Karen must not investigate, determine or exercise conflicted oversight of a matter in which she is implicated.

12.2 Gary Burton — Director of Operations

Gary is responsible for supporting the operational and resource arrangements necessary for implementation of this policy.

This may include:

- premises accessibility;
- equipment and practical adjustments;
- health and safety;
- resources and expenditure;
- relevant operational arrangements;
- and implementing agreed management decisions.

Gary will contribute to significant reasonable-adjustment decisions where there are premises, cost, resource, safety or operational implications.

He must not investigate or determine matters concerning himself or another matter in which he has an actual or perceived conflict of interest.

12.3 Michael Robinson — House Manager

Michael provides day-to-day leadership and operational oversight at Nelson House.

His responsibilities include:

- guiding Team Members in inclusive daily practice;
- helping identify and respond to concerns;
- supporting accessible communication and individual adjustments;
- ensuring appropriate reporting and recording;
- overseeing relevant Support Plan and Risk Assessment updates;
- supporting reflective discussions and Team learning;
- and escalating matters requiring Registered Service Manager or external involvement.

Michael may coordinate certain complaints under the established conflict-of-interest arrangements but is not the automatic independent investigator of complaints involving Directors.

12.4 Brooke Skilton-Knights — Clinical Adviser

Brooke may provide clinically informed or specialist advice where relevant to an individual young person's needs and within her agreed professional role.

This may include advice relating to communication, emotional wellbeing, neurodevelopmental needs, trauma-responsive support or other relevant areas.

Brooke is not automatically an EDI investigator and does not replace the management, safeguarding or complaints reporting chain.

12.5 Support Workers and Bank Support Workers

All Team Members must:

1. Read, understand and follow this policy.
2. Treat young people fairly and respectfully.
3. Model inclusive, non-discriminatory communication.

4. Recognise and appropriately challenge discriminatory behaviour.
5. Consider individual identity, accessibility and communication needs.
6. Follow agreed Support Plans, Risk Assessments and adjustments.
7. Listen to young people's experiences and concerns.
8. Report safeguarding, discrimination and professional-conduct concerns appropriately.
9. Record relevant matters accurately and promptly on LIEF.
10. Seek management guidance when unsure.
11. Participate in appropriate induction, learning and reflective practice.
12. Maintain confidentiality and professional boundaries.

12.6 Young People

Young people will be supported and encouraged to respect the rights, identities and differences of others.

They should be helped to understand house expectations, healthy relationships, boundaries and ways of raising concerns.

The responsibility for ensuring that discrimination concerns are appropriately recognised and addressed rests with Independent Horizons and its Team Members, not solely with the young person affected.

13. YOUNG PEOPLE'S VOICE, RIGHTS AND ADVOCACY

13.1 Participation

Young people must be supported to understand their rights and participate meaningfully in decisions affecting them.

Their views should be evident, where relevant, within:

- Support Plans;
- Risk Assessments;
- Key Work and ILS;
- PBS arrangements;
- reviews and planning meetings;
- reasonable-adjustment decisions;
- incident follow-up;
- complaints and representations;
- and service feedback.

Young people's views must be recorded accurately.

Disagreement with an adult's view must not be recorded as agreement or automatically interpreted as non-engagement.

13.2 Raising Concerns Without Retaliation

Young people must be able to raise concerns about:

- how they have been treated;
- discriminatory language or behaviour;
- their identity, privacy or dignity;
- accessibility;
- unfair decisions;
- bullying or exclusion;
- or the conduct of a Team Member or other person.

They must not be punished, threatened, disadvantaged or have their support withdrawn because they raise a concern.

13.3 Advocacy and Independent Support

Young people should be supported to access independent advocacy and relevant external professionals.

This may include:

- their social worker;
- their Independent Reviewing Officer;
- their Personal Adviser, where applicable;
- their placing or accommodating authority;
- independent advocacy services;
- Ofsted;
- or other appropriate independent services.

The Young Person's Guide must provide accessible information about rights, complaints and relevant contact routes.

Young people do not need Independent Horizons' permission to contact their social worker, advocate or another legitimate external route.

13.4 Feedback and Service Development

Independent Horizons will seek young people's views about whether Nelson House feels respectful, accessible and inclusive.

Feedback may be gathered through ordinary conversations, Key Work, reviews, complaints, compliments, house discussions and other appropriate opportunities.

Young people should be able to influence practice and service improvement without being pressured to participate in formal meetings or surveys.

14. RECORDING, CONFIDENTIALITY AND INFORMATION SHARING

14.1 LIEF Recording

LIEF is the Independent Horizons recording system.

Team Members and managers must use the appropriate LIEF records according to the nature of the concern or activity and the relevant procedure.

This may include:

- incident records;
- safeguarding records;
- complaints records;
- de-escalation records;
- Key Work and ILS records;
- Positive Behaviour Support Plans;
- Support Plans;
- Risk Assessments;
- reasonable-adjustment decisions;
- and management review or follow-up records.

Recording must be timely, accurate, factual, proportionate and respectful.

14.2 Recording Standards

Records should distinguish between:

- direct observation;
- what somebody else reported;
- the young person's own words and views;
- relevant evidence;
- professional analysis;
- decisions and their rationale;
- actions taken;
- people informed;
- and outcomes or further actions required.

Where discriminatory threats, significant abusive language or allegations are relevant, exact words should be recorded where necessary to establish what occurred.

Records must not exaggerate, minimise or introduce unsupported assumptions.

14.3 Cross-Referencing

Where an EDI concern overlaps with safeguarding, complaints, incidents or behaviour support, the appropriate specialist records must be completed and cross-referenced where necessary.

Information must not be duplicated unnecessarily.

The purpose is to create a clear and accessible account of what happened, what was decided and what support followed, without unnecessarily reproducing sensitive personal information.

14.4 Confidentiality and Sensitive Information

Information about a young person's disability, identity, religion, sexuality, family circumstances, health or other personal matters must be managed in accordance with the Data Protection Act 2018, UK GDPR and Independent Horizons' information-governance arrangements.

Access must be restricted according to role, purpose and need.

Confidentiality is important but not absolute.

Information may be shared where necessary and lawful for safeguarding, support planning, professional involvement or statutory responsibilities.

Where appropriate and safe, the young person should understand what information is being shared and why.

14.5 Management and Independent Investigation Records

Sensitive complaints or allegations requiring independent consideration must be managed with appropriate restricted access.

A person who is the subject of a complaint or allegation must not obtain access to restricted information through ordinary management or governance processes where that would compromise the required independence, confidentiality or safeguarding arrangements.

Records must provide an appropriate audit trail of decisions, referrals, investigation outcomes and follow-up.

15. LEARNING, SUPERVISION AND TEAM DEVELOPMENT

15.1 Induction and Continuing Development

All Team Members must receive appropriate induction and development concerning equality, inclusion and anti-discriminatory practice.

Learning should support Team Members to understand:

- equality and protected characteristics;
- individualised and trauma-responsive practice;

- cultural and religious sensitivity;
- disability and accessibility;
- communication needs;
- unconscious assumptions and bias;
- discriminatory behaviour and its impact;
- responding to disclosures;
- recording and escalation;
- and young people's rights.

Training should be appropriate to role and identified need.

This policy does not establish a separate statutory requirement for an annual EDI course. Training and refresher arrangements will be determined through applicable duties and Independent Horizons' Workforce Development Plan.

15.2 Reflective Supervision

EDI should be considered within reflective supervision where relevant to practice, young people's experiences, concerns, incidents or individual development needs.

Independent Horizons provides monthly formal recorded reflective supervision as an organisational standard for regularly employed Team Members.

Supervision may explore:

- assumptions or bias;
- communication and relationships;
- inclusive practice;
- safeguarding and discrimination;
- complaints or difficult situations;
- reasonable adjustments;
- professional boundaries;
- and learning needs.

15.3 Team Learning and Practice Development

Relevant EDI themes should inform Team meetings, monthly Team learning activity, incident debriefs, management discussions and appraisal or development arrangements.

Learning may arise from:

- young people's feedback;
- complaints and compliments;
- incidents;
- professional observations;
- emerging guidance;
- safeguarding reviews;
- or identified changes in young people's needs.

The emphasis should be on whether learning improves practice rather than simply whether training has been completed.

15.4 Specialist and Needs-Led Learning

Where a young person's individual circumstances require specialist knowledge, management should consider appropriate advice, guidance or additional learning.

This may involve health, education, clinical, disability, communication, cultural or other relevant expertise.

The need for additional learning must not automatically be interpreted as a reason to exclude a young person from consideration for support.

16. QUALITY ASSURANCE AND REGULATION 32

16.1 Management Oversight

Independent Horizons will monitor whether this policy is understood and implemented in practice.

Management oversight should consider whether:

- young people feel respected and included;
- accessibility needs are identified and addressed;
- reasonable adjustments are effective;
- concerns and complaints are appropriately recorded and responded to;
- discrimination or bullying patterns are emerging;
- Team Members demonstrate inclusive practice;
- and relevant actions lead to improvement.

16.2 Monthly Independent Horizons Governance

Equality and inclusion will be considered within existing monthly Independent Horizons management and quality-assurance arrangements where relevant.

This may include reviewing:

- complaints and compliments themes;
- discriminatory incidents;
- safeguarding concerns;
- placement stability;
- young people's feedback;
- effectiveness of reasonable adjustments;
- workforce learning;
- and outstanding management actions.

Sensitive matters involving a manager or Director must not be shared through ordinary governance in a way that compromises confidentiality or independent investigation arrangements.

Appropriately anonymised organisational learning may be considered where lawful and suitable.

16.3 Regulation 32 Quality of Support Review

Independent Horizons undertakes a formal Quality of Support Review at least once every six months under Regulation 32.

Equality, diversity and inclusion should contribute to this review where relevant to young people's experiences and outcomes.

The review should consider whether young people:

- feel safe and respected;
- can participate in decisions;
- can access appropriate support and opportunities;
- have their individual needs and identity respected;
- experience appropriate responses to discrimination;
- and are benefiting from agreed adjustments and inclusive support.

Relevant findings should contribute to the written Regulation 32 report and resulting action planning.

Monthly internal governance remains a separate Independent Horizons arrangement and does not replace the statutory six-monthly review.

16.4 Evidence of Improvement

Independent Horizons should distinguish between:

- having a policy;
- recording training or activity;
- completing agreed actions;
- and evidence that young people's experience or outcomes have improved.

Management should consider proportionate indicators of improvement and review whether actions have made a meaningful difference.

Because Nelson House is a small, three-place service, demographic monitoring and reporting must be proportionate.

Information must not be collected or published unnecessarily where it could identify individual young people or reveal sensitive personal circumstances.

16.5 Contractual Monitoring

Where an applicable placing-authority or commissioning agreement requires additional equality-related monitoring, action planning or reporting, Independent Horizons will meet those requirements.

Such arrangements must comply with confidentiality and data-protection responsibilities.

17. LINKED INDEPENDENT HORIZONS DOCUMENTS

This policy should be read alongside the current applicable versions of relevant Independent Horizons policies, procedures and operational documents.

These include, where applicable:

- Statement of Purpose — October 2026 v3;
- Young Person's Guide;
- Safeguarding Young People Policy and Procedure;
- Allegations Against a Team Member Policy and Procedure;
- Compliments and Complaints Policy and Procedure;
- Whistleblowing Procedure;
- Positive Behaviour Support and Behaviour Management Policy and Procedure;
- Missing Young Person Policy and Procedure;
- Risk Assessment and Support Planning arrangements;
- relevant referral, matching and admission procedures;
- confidentiality, data protection and information-sharing policies;
- Workforce Development Plan;
- relevant recruitment, grievance, disciplinary and Team Member policies;
- and individual Support Plans, Risk Assessments, PBS Plans and relevant LIEF records.

Document-status clarification for management review: The October 2026 Statement of Purpose v3 is the approved organisational framework for this revision. The Compliments and Complaints Policy v2 has final substantive content but is awaiting formal management approval and an effective date. Until it is formally issued, the current applicable approved complaints arrangements must be followed, consistently with statutory requirements and the approved Statement of Purpose.

Before EDI v2 is formally approved, linked-document titles and versions must be checked against the current controlled policy register, including the status of the Compliments and Complaints Policy v2.

18. POLICY REVIEW AND DOCUMENT CONTROL

18.1 Policy Ownership

Karen Burton, Director / Registered Service Manager / Nominated Individual, is responsible for maintaining this policy and ensuring that it remains appropriate to Independent Horizons' registered service model, safeguarding responsibilities and operational arrangements.

Policy ownership does not authorise Karen to investigate or determine an individual complaint or allegation in which she is implicated or conflicted.

18.2 Review Arrangements

This policy will be reviewed at least annually, or earlier where required.

An earlier review may be triggered by:

- significant safeguarding or discrimination concerns;
- serious incidents or allegations;
- complaints or recurring concerns;
- changes to legislation or statutory guidance;
- changes to Ofsted requirements;
- changes to the Statement of Purpose;
- changes to management responsibilities;
- relevant young-person feedback;
- evidence that reasonable-adjustment or recording arrangements are ineffective;
- or learning from supervision, governance or Regulation 32.

18.3 Approval and Implementation

Any substantive amendment must be considered and approved through the appropriate Independent Horizons management process before being issued as an approved policy.

Following approval:

- the controlled version and effective date must be recorded;
- the previous version must be marked as superseded;
- Team Members must be informed of the revised requirements;
- relevant induction, guidance and linked procedures must be updated where necessary;
- and implementation must be monitored through normal management and quality-assurance arrangements.

18.4 Document Status

This document is the proposed 2026 v2 Equality, Diversity and Inclusion Policy and Procedure.

Final content – ready for management approval

It does not replace the January 2026 policy solely by being drafted.

Management approval

Approved by: _____

Signature: _____

Role: _____

Date of approval: _____

Effective date: _____

Next review due: _____

**Independent Horizons Limited — Equality, Diversity and Inclusion Policy and Procedure
— 2026 v2**

End of final content – ready for management approval.