



SURKOVSKY CENTRE LTD

EQUALITY, DIVERSITY & INCLUSION

Professional Standards, Ethics and Corporate Behaviour

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1. Purpose

SURKOVSKY CENTRE LTD is committed to promoting equality, valuing diversity and maintaining an inclusive environment in which every person is treated with dignity, fairness and respect.

The purpose of this policy is to:

- establish the Centre's commitment to equality, diversity and inclusion;
- prevent unlawful discrimination, harassment, bullying and victimisation;
- promote fair access to employment, education, research and professional opportunities;
- support an organisational culture in which different experiences, identities, perspectives and contributions are respected;
- ensure that decisions are made fairly, transparently and on the basis of relevant objective criteria;
- define the responsibilities of directors, employees, contractors, learners, researchers and other persons associated with the Centre.

The Centre recognises that equality, diversity and inclusion are essential to high-quality education, responsible research, professional integrity, innovation and effective international cooperation.



2. Scope

This policy applies to all persons involved in, employed by, representing or participating in the activities of SURKOVSKY CENTRE LTD, including:

- directors and officers;
- employees and workers;
- consultants and contractors;
- researchers and academic contributors;
- lecturers, trainers and assessors;
- students, learners and programme participants;
- volunteers and interns;
- applicants for employment, study or participation;
- visiting speakers and conference participants;
- suppliers, partners and collaborating organisations;
- visitors and members of the public engaging with the Centre.

The policy applies to all areas of the Centre's operations, including:

- recruitment and selection;
- employment and professional development;
- education and training;
- research and publication;
- assessment and academic decision-making;
- conferences, events and public engagement;
- consultancy and advisory services;
- procurement and contracting;
- digital communications and online activities;
- international partnerships and cooperation.

It applies to conduct occurring:

- on the Centre's premises;
- at external venues;
- during business travel;
- at conferences, meetings and events;



- through email, telephone, social media and digital platforms;
 - in any activity undertaken on behalf of the Centre.
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3. Policy Statement

SURKOVSKY CENTRE LTD is committed to providing equality of opportunity and to ensuring that no person is subjected to unlawful discrimination.

The Centre will not unlawfully discriminate against any person because of:

- age;
- disability;
- gender reassignment;
- marriage or civil partnership;
- pregnancy or maternity;
- race;
- colour;
- nationality;
- ethnic or national origin;
- religion or belief;
- sex;
- sexual orientation.

These are protected characteristics under the Equality Act 2010.

The Centre also seeks, where appropriate and consistent with applicable law, to prevent unfair treatment connected with:

- socio-economic background;
- caring responsibilities;
- language or accent;
- educational background;
- employment status;
- professional background;
- immigration or residency status;
- political or philosophical opinion;
- any other personal circumstance unrelated to a person's ability, conduct or legitimate role requirements.



All decisions shall be based on relevant considerations such as merit, competence, qualifications, experience, performance, professional suitability and legitimate organisational requirements.

4. Guiding Principles

The Centre's approach to equality, diversity and inclusion is based on the following principles.

4.1 Dignity and respect

Every person has the right to be treated with dignity, courtesy and respect.

4.2 Equality of opportunity

People should have fair access to opportunities and should not be disadvantaged by unlawful or irrelevant considerations.

4.3 Inclusion

Individuals should be able to participate meaningfully in the Centre's activities and contribute without being excluded, marginalised or silenced.

4.4 Diversity

Different backgrounds, experiences, cultures, disciplines and perspectives strengthen the quality of education, research, discussion and decision-making.

4.5 Fairness

Rules, processes and decisions should be applied consistently, proportionately and objectively.

4.6 Accessibility

The Centre will seek to identify and reduce avoidable barriers to participation.

4.7 Accountability

All persons covered by this policy are responsible for their conduct and for contributing to a respectful and inclusive environment.

5. Forms of Discrimination

The Centre recognises the following principal forms of unlawful discrimination.

5.1 Direct discrimination

Direct discrimination occurs when a person is treated less favourably because of a protected characteristic.

5.2 Indirect discrimination

Indirect discrimination may occur where a provision, criterion or practice applies to everyone but places persons sharing a protected characteristic at a particular disadvantage and cannot be objectively justified.



5.3 Discrimination arising from disability

This may occur where a disabled person is treated unfavourably because of something arising in consequence of their disability and the treatment cannot be objectively justified.

5.4 Failure to make reasonable adjustments

The Centre has a duty, where applicable, to consider reasonable adjustments for disabled persons to reduce substantial disadvantage.

5.5 Harassment

Harassment is unwanted conduct related to a protected characteristic that has the purpose or effect of:

- violating a person's dignity; or
- creating an intimidating, hostile, degrading, humiliating or offensive environment.

Harassment may be verbal, non-verbal, written, visual, physical or digital.

5.6 Sexual harassment

Sexual harassment is unwanted conduct of a sexual nature that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.

5.7 Victimisation

Victimisation occurs when a person is subjected to a detriment because they have:

- made a complaint of discrimination or harassment;
- supported another person's complaint;
- provided evidence or information;
- raised a concern under equality legislation;
- participated in an investigation or proceeding.

5.8 Discrimination by association or perception

Unlawful discrimination may arise because of a person's association with someone who has a protected characteristic or because they are wrongly perceived to have a protected characteristic.

6. Bullying and Unacceptable Conduct

Bullying is not always based on a protected characteristic, but it is incompatible with the values of the Centre and will not be tolerated.

Bullying may include:

- repeated humiliation or ridicule;



- threatening or intimidating behaviour;
- deliberate exclusion;
- misuse of authority;
- unreasonable personal criticism;
- spreading malicious rumours;
- aggressive or insulting communication;
- undermining a person's work or professional standing;
- inappropriate pressure or coercion;
- hostile conduct through digital communication or social media.

Reasonable management, academic supervision, performance feedback, quality assurance, assessment or disciplinary action conducted fairly and professionally does not constitute bullying.

7. Employment and Recruitment

SURKOVSKY CENTRE LTD is committed to fair and transparent recruitment and employment practices.

Recruitment, selection and appointment decisions shall be based on:

- the requirements of the role;
- relevant qualifications;
- skills and competence;
- professional experience;
- capability and suitability;
- lawful eligibility requirements.

The Centre will seek to ensure that:

- job descriptions and selection criteria are clear and relevant;
- vacancies are communicated fairly;
- selection decisions are documented where appropriate;
- interviews and assessments are conducted objectively;
- reasonable adjustments are considered for disabled applicants;
- no applicant is asked irrelevant or unlawfully discriminatory questions;
- terms and conditions are applied fairly;



- access to training and development is based on legitimate organisational and professional considerations;
- promotion and performance decisions are evidence-based;
- disciplinary and grievance processes are conducted consistently.

Positive action may be considered where permitted by law, but unlawful positive discrimination will not be practised.

8. Education, Training and Assessment

The Centre is committed to providing fair and inclusive educational and professional development opportunities.

The Centre will seek to ensure that:

- admissions and participation criteria are clear and proportionate;
- learners are treated fairly and consistently;
- teaching and training materials are respectful and inclusive;
- different perspectives are considered where academically relevant;
- assessment criteria are transparent;
- assessment is based on demonstrated achievement;
- reasonable adjustments are considered where appropriate;
- accessibility needs are identified and addressed where reasonably practicable;
- no learner is disadvantaged because of an irrelevant personal characteristic;
- complaints and appeals are handled fairly.

Academic standards will not be lowered as a substitute for reasonable adjustment. Adjustments should enable fair access while preserving the integrity of learning outcomes and assessment standards.

9. Research and Publication

Equality, diversity and inclusion shall be considered in research and publication activities where relevant.

Researchers and contributors are expected to:

- treat participants and colleagues with dignity and respect;
- avoid discriminatory assumptions and language;
- consider whether research design creates unnecessary barriers or exclusion;
- use inclusive and accurate terminology;



- represent individuals and communities fairly;
- avoid stereotyping or stigmatising groups;
- consider accessibility in dissemination where reasonably practicable;
- comply with the Research Ethics Policy;
- ensure authorship and recognition decisions are fair and evidence-based.

Research findings may address controversial or sensitive issues. Academic freedom includes the freedom to investigate, discuss and publish difficult subjects, provided that such work is conducted lawfully, ethically and with appropriate professional standards.

10. Conferences, Events and Public Activities

The Centre will seek to ensure that conferences, seminars, workshops and public events are welcoming and professionally managed.

Where reasonably practicable, the Centre will consider:

- physical and digital accessibility;
- accessible communication formats;
- dietary and religious requirements;
- scheduling barriers;
- respectful speaker and participant conduct;
- diversity of perspectives and expertise;
- procedures for reporting inappropriate behaviour.

All participants must comply with the Centre's Code of Conduct.

The Centre reserves the right to warn, remove or exclude any person whose conduct is discriminatory, abusive, threatening, harassing or seriously disruptive.

11. Reasonable Adjustments and Accessibility

SURKOVSKY CENTRE LTD will consider reasonable adjustments for disabled persons where required by law and appropriate to the circumstances.

Adjustments may include, depending on the activity:

- alternative communication formats;
- changes to working or learning arrangements;
- additional time;
- accessible digital materials;



- modified equipment;
- remote participation;
- changes to physical arrangements;
- adjustments to assessment procedures that preserve academic standards;
- support for communication or mobility needs.

Requests will be considered individually.

The Centre may request relevant information where necessary to understand the disadvantage and identify an appropriate adjustment.

An adjustment may not be reasonable where it would:

- fundamentally alter the purpose or integrity of an activity;
- compromise academic or professional standards;
- create disproportionate cost or operational difficulty;
- create a significant health or safety risk;
- impose an unreasonable burden on the Centre.

Any refusal of an adjustment should be based on legitimate and documented considerations.

12. Freedom of Expression and Academic Freedom

The Centre supports freedom of expression, academic freedom and open intellectual debate.

Equality and inclusion do not require agreement with every opinion, belief or academic argument.

Individuals may express lawful views, including controversial or unpopular views, provided that they do so:

- lawfully;
- in good faith;
- respectfully;
- without harassment or intimidation;
- without inciting violence or unlawful discrimination;
- in accordance with professional and academic standards.

The expression of a reasoned disagreement is not, by itself, harassment or discrimination.

The Centre will seek to balance freedom of expression with the rights, dignity and safety of others.



13. Religious and Philosophical Beliefs

The Centre respects lawful religious and philosophical beliefs, including the right to hold no religious belief.

Where reasonably practicable, the Centre may consider requests relating to:

- religious observance;
- dress;
- dietary requirements;
- prayer;
- scheduling.

Such arrangements must remain compatible with:

- legal obligations;
- health and safety;
- academic and professional standards;
- operational requirements;
- the rights of others.

No person may use religion or belief as a justification for harassment, discrimination or the denial of another person's lawful rights.

14. Responsibilities

14.1 Board of Directors

The Board of Directors is responsible for:

- approving this policy;
- supporting equality, diversity and inclusion at governance level;
- ensuring that significant equality risks are appropriately considered;
- reviewing serious or systemic concerns where necessary.

14.2 Director

The Director is responsible for:

- implementing this policy;
- promoting a respectful and inclusive culture;
- ensuring concerns are addressed appropriately;
- considering reasonable adjustments;



- maintaining relevant records;
- reviewing the effectiveness of the policy.

14.3 Managers, supervisors and project leads

Persons with supervisory or leadership responsibilities must:

- apply policies consistently;
- make decisions using objective criteria;
- respond appropriately to concerns;
- avoid misuse of authority;
- identify and address exclusionary or discriminatory practices;
- seek advice where necessary.

14.4 Employees, contractors and representatives

All employees, contractors and representatives must:

- treat others with dignity and respect;
- comply with this policy;
- avoid discriminatory, harassing or bullying conduct;
- cooperate with investigations;
- report serious concerns;
- maintain confidentiality;
- participate in relevant training where required.

14.5 Learners, researchers and participants

Learners, researchers and participants are expected to:

- respect the rights and dignity of others;
- comply with applicable policies and codes;
- contribute to a safe and inclusive environment;
- raise concerns responsibly;
- avoid knowingly false, malicious or vexatious allegations.

15. Reporting Concerns

Any person who believes that this policy has been breached should raise the matter as soon as reasonably practicable.

Concerns may be reported to:



- the relevant manager or activity lead;
- the Director;
- the person responsible for complaints;
- another appropriate designated person.

A report should, where possible, include:

- the nature of the concern;
- the persons involved;
- relevant dates and locations;
- available evidence;
- details of witnesses;
- any immediate support or adjustment required.

Anonymous concerns may be considered, although anonymity may limit the Centre's ability to investigate or respond.

16. Handling Complaints

Complaints under this policy will normally be handled in accordance with the Centre's Complaints Procedure, Grievance Procedure or other relevant process.

The Centre will seek to ensure that complaints are:

- acknowledged promptly;
- considered impartially;
- handled confidentially;
- investigated proportionately;
- determined on the available evidence;
- resolved without unreasonable delay.

Possible outcomes may include:

- informal resolution;
- mediation, where appropriate;
- an apology;
- training or guidance;
- reasonable adjustments;
- changes to procedures;



- disciplinary action;
- termination of a contract or engagement;
- exclusion from an activity;
- referral to an external authority where required.

Not every complaint will be upheld. A finding will be based on the evidence and the applicable standard of proof.

17. Confidentiality

Information relating to equality concerns, complaints and investigations will be handled confidentially and shared only where necessary.

Absolute confidentiality cannot be guaranteed where disclosure is required:

- to investigate a complaint;
- to provide procedural fairness;
- to protect a person from harm;
- to comply with legal obligations;
- to obtain professional or legal advice.

Personal data will be processed in accordance with the Data Protection Act 2018, UK GDPR and the Centre's Data Protection Policy.

18. Protection from Retaliation

No person will be penalised for raising a genuine concern, making a complaint in good faith, supporting another person or participating in an investigation.

Retaliation, intimidation or victimisation may itself constitute a serious breach of this policy and may result in disciplinary or contractual action.

This protection does not apply to allegations that are knowingly false, malicious or deliberately misleading.

19. Breaches of the Policy

A breach of this policy may result in:

- informal corrective action;
- formal warning;
- disciplinary action;
- withdrawal from duties;



- removal from a project or activity;
- termination of employment or contract;
- exclusion from Centre activities;
- referral to a professional, regulatory or public authority.

The response will depend on:

- the seriousness of the conduct;
 - the available evidence;
 - the effect on the persons involved;
 - whether the conduct was repeated;
 - any previous relevant concerns;
 - applicable contractual and legal requirements.
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20. Training and Awareness

The Centre may provide appropriate equality, diversity and inclusion training or guidance.

Training may cover:

- protected characteristics;
- discrimination and harassment;
- inclusive communication;
- reasonable adjustments;
- fair recruitment and assessment;
- unconscious assumptions and decision-making;
- reporting and complaint procedures;
- responsibilities under this policy.

The type and frequency of training will reflect the person's role and the Centre's operational needs.

21. Monitoring

The Centre may monitor the implementation of this policy through:

- review of complaints and outcomes;
- feedback from employees, learners and participants;
- review of recruitment and participation processes;



- accessibility reviews;
- policy audits;
- evaluation of training;
- analysis of recurring concerns.

Any equality data collected will be:

- relevant and proportionate;
- handled confidentially;
- processed lawfully;
- used for legitimate organisational purposes.

Monitoring information will not be used to make unlawfully discriminatory decisions.

22. Legal and Regulatory Framework

This policy is informed by relevant UK legislation and principles, including:

- Equality Act 2010;
- Human Rights Act 1998;
- Employment Rights Act 1996;
- Protection from Harassment Act 1997;
- Data Protection Act 2018;
- UK General Data Protection Regulation;
- applicable health and safety legislation;
- relevant employment, education and contractual obligations.

The inclusion of legislation in this policy does not create rights beyond those provided by law or contract.

Where the Centre operates internationally, local legal requirements may also apply. Where standards differ, the Centre will seek to comply with applicable law while maintaining the principles of dignity, fairness and respect.

23. Related Documents

This policy should be read alongside:

- Code of Conduct;
- Complaints Procedure;
- Academic Integrity Policy;



- Research Ethics Policy;
- Data Protection Policy;
- Recruitment and Selection Policy;
- Safeguarding Policy;
- Health and Safety Policy;
- Disciplinary Procedure;
- Grievance Procedure;
- Quality Assurance Policy.

24. Review of the Policy

This policy will be reviewed annually or earlier where:

- legislation or guidance changes;
- the Centre's activities change significantly;
- a complaint or incident identifies a weakness;
- monitoring indicates that revision is required;
- the Board of Directors or Director considers an earlier review necessary.

Amendments must be appropriately approved and recorded in the document control history.

25. Approval

This Equality, Diversity & Inclusion was approved by the Board of Directors of SURKOVSKY CENTRE LTD and takes effect from the effective date stated in this document.

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Approved by: Board of Directors

Authorised by: Director

Surkovsky Centre Ltd

Signature:

Name: Jozef SURKOVSKY

Date: 1 August 2026



Document History

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1.0	1 August 2026	Initial issue	Director

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