



EQUALITY, DIVERSITY & INCLUSION POLICY

Effective date: 20 February 2026

Last updated: 23 July 2026

1. Policy Statement

Athena GESDA Ltd is committed to promoting equality, valuing diversity and creating an inclusive environment in which everyone is treated fairly, respectfully and with dignity.

We believe that diversity of background, experience, identity and perspective strengthens our business, improves decision-making and enhances the quality and relevance of the services we provide.

We will not tolerate unlawful discrimination, harassment, sexual harassment, bullying, victimisation or other unfair treatment in our workplace, business relationships, programmes, events or services.

We are committed to providing equal opportunities and removing unjustified barriers to participation, employment, development and access to our services.

Our objective is to ensure that individuals are:

- treated fairly and consistently;
- respected as individuals;
- able to contribute and participate;
- considered on merit;
- supported through reasonable adjustments where required;
- protected from discrimination, harassment and victimisation; and
- able to raise concerns without fear of retaliation.

2. About Athena GESDA

Athena GESDA Ltd is a UK-based international education consultancy.

Our activities may include:

- international student recruitment strategy;
- market-entry and internationalisation consultancy;
- university partnership development;
- international education roadshows;
- school and university engagement;
- conferences, workshops and networking events;

- leadership immersion programmes;
- professional development and training;
- counsellor engagement and certification;
- university-industry-government collaboration;
- employability and enterprise initiatives;
- Global Capability Centre advisory and operational support;
- admissions, conversion and compliance support;
- research and innovation partnerships;
- international mobility programmes; and
- other education-related consultancy and programme-delivery services.

Company name: Athena GESDA Ltd

Company number: 17044526

Registered office: 71 Prospect Street, Nottingham, NG7 5QE, United Kingdom

Website: www.athenagesda.org

Email: info@athenagesda.org

3. Purpose of this Policy

The purpose of this Policy is to:

- communicate Athena GESDA's commitment to equality, diversity and inclusion;
- explain the standards expected of everyone working for or with us;
- prevent unlawful discrimination, harassment, sexual harassment and victimisation;
- support fair recruitment, engagement and professional development;
- promote accessibility and inclusive participation;
- provide a framework for reporting and addressing concerns;
- ensure that equality considerations are reflected in our services and international activities; and
- support compliance with applicable equality and employment legislation.

4. Scope

This Policy applies to:

- directors;
- employees;
- workers;
- consultants;
- contractors;
- interns;
- volunteers;
- agency personnel;
- applicants for employment or engagement;
- suppliers;
- agents;
- representatives;
- delivery partners;
- speakers;
- trainers;
- Event participants;
- Delegates;
- Clients; and
- any other person working for or interacting with Athena GESDA.

It applies to conduct:

- in the workplace;
- while working remotely;
- during business travel;
- at roadshows and Events;
- at social activities connected with work;

- through email, telephone and messaging services;
- through video meetings;
- on social media where there is a connection with Athena GESDA;
- at Client or Partner premises; and
- during any activity undertaken on behalf of Athena GESDA.

5. Legal Framework

Athena GESDA is committed to complying with the Equality Act 2010 and other applicable equality, employment and human-rights legislation.

The Equality Act 2010 protects people against unlawful discrimination because of the following protected characteristics:

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

This Policy also seeks to promote fairness and inclusion in relation to other characteristics or circumstances that may not always be legally protected, including:

- socio-economic background;
- caring responsibilities;
- educational background;
- accent or language;
- working pattern;
- immigration or residency status;
- geographic location;

- physical appearance;
- health circumstances;
- neurodiversity;
- professional background; and
- family circumstances.

Nothing in this Policy creates a legal status equivalent to a protected characteristic where the law does not provide one. However, Athena GESDA expects respectful and fair treatment for everyone.

6. What Equality, Diversity and Inclusion Mean

6.1. Equality

Equality means treating people fairly and ensuring that individuals have genuine access to opportunities, services and participation.

Equality does not always require identical treatment. Different treatment may be appropriate where it removes disadvantage, meets a particular need or provides a reasonable adjustment.

6.2. Diversity

Diversity means recognising, respecting and valuing differences between people.

These differences may include identity, experience, culture, background, knowledge, perspective, working style and personal circumstances.

6.3. Inclusion

Inclusion means creating an environment in which people feel respected, able to participate and able to contribute without being excluded or disadvantaged unnecessarily.

Inclusion may require us to adapt our normal practices to remove barriers and accommodate different needs.

7. Our Commitments

Athena GESDA will seek to:

- provide equality of opportunity;
- make decisions objectively and on merit;
- challenge discrimination and exclusion;

- promote respectful communication;
- provide reasonable adjustments;
- design accessible services and Events;
- encourage a range of perspectives;
- avoid stereotypes and assumptions;
- address underrepresentation where appropriate;
- maintain fair recruitment and supplier-selection processes;
- prevent harassment and sexual harassment;
- take concerns seriously;
- protect people who raise concerns in good faith; and
- regularly review our practices.

8. Unlawful Discrimination

Athena GESDA prohibits all forms of unlawful discrimination.

8.1. Direct discrimination

Direct discrimination occurs where someone is treated less favourably because of a protected characteristic.

Examples may include:

- rejecting a candidate because of their age;
- excluding a Delegate because of their race or nationality;
- refusing a reasonable business opportunity because of someone's religion;
- treating a woman less favourably because she is pregnant; or
- refusing to work with someone because they are undergoing gender reassignment.

Direct discrimination may also occur because of:

- a protected characteristic that a person is perceived to have; or
- a person's association with someone who has a protected characteristic.

8.2. Indirect discrimination

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

Examples may include:

- requiring all meetings to take place at a time that unnecessarily disadvantages people with particular caring or religious responsibilities;
- using an inaccessible venue without considering alternatives;
- imposing a language or qualification requirement that is not genuinely necessary; or
- requiring full-time availability where flexible working could reasonably meet the business need.

8.3. Discrimination arising from disability

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

8.4. Failure to make reasonable adjustments

Athena GESDA will take reasonable steps to remove or reduce substantial disadvantages experienced by disabled people.

Reasonable adjustments may relate to:

- physical premises;
- working arrangements;
- recruitment processes;
- technology;
- communication formats;
- Event access;
- programme schedules;
- equipment; or
- the way a Service is delivered.

8.5. Pregnancy and maternity discrimination

No person will be treated unfavourably because of pregnancy, maternity leave, pregnancy-related illness or circumstances connected with maternity.

8.6. Marriage and civil partnership discrimination

No employee, worker or applicant will be treated less favourably because they are married or in a civil partnership.

9. Harassment

Harassment is unwanted conduct related to a relevant 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;
- written;
- physical;
- visual;
- digital;
- intentional; or
- unintentional.

Examples may include:

- insulting or offensive comments;
- racial, religious, sexist, homophobic, transphobic or ableist remarks;
- mocking an accent, disability or personal characteristic;
- displaying offensive images;
- intrusive questions about someone's identity or private life;
- exclusion because of a protected characteristic;
- repeated misgendering intended to humiliate;

- unwanted jokes or stereotypes;
- offensive messages or social-media posts; and
- intimidating or humiliating behaviour.

A person may experience harassment even where the conduct is not directed specifically at them.

Whether conduct amounts to harassment may depend on:

- the person's perception;
- the surrounding circumstances; and
- whether it was reasonable for the conduct to have that effect.

10. 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.

Sexual harassment may include:

- unwanted sexual comments or jokes;
- sexualised remarks about appearance;
- intrusive questions about a person's sex life;
- unwanted touching;
- sexual gestures;
- displaying or sending sexual images;
- repeated requests for dates after refusal;
- sexual propositions;
- suggestive messages;
- comments about someone's body;
- sharing intimate material without consent;
- unwanted physical proximity;

- promises of professional benefit in exchange for sexual attention;
- threats of disadvantage for refusing sexual attention; or
- inappropriate conduct at work-related social events.

Athena GESDA will take reasonable steps to prevent sexual harassment.

This includes considering risks arising from:

- business travel;
- evening receptions;
- alcohol at Events;
- one-to-one meetings;
- conferences;
- hotels and shared transport;
- interactions with Clients or Delegates;
- social-media communication; and
- overseas programmes.

Sexual harassment is prohibited regardless of the sex, sexual orientation, seniority or employment status of the people involved.

11. Third-Party Harassment

Harassment may be carried out by a person who is not employed by Athena GESDA, including:

- a Client;
- Delegate;
- university representative;
- school representative;
- supplier;
- speaker;
- Partner;
- contractor;

- venue employee; or
- member of the public.

Athena GESDA will take complaints of third-party harassment seriously and will take reasonable and proportionate steps to prevent and respond to it.

These steps may include:

- warning the individual;
- requiring an apology;
- removing the individual from an Event;
- changing working arrangements;
- ending a meeting;
- reporting conduct to the relevant organisation;
- suspending or terminating a business relationship;
- contacting venue security; or
- reporting serious conduct to the police or another authority.

No employee, consultant or contractor is expected to tolerate harassment as part of their role.

12. Victimisation

Victimisation occurs where someone is subjected to a detriment because they:

- made a complaint of discrimination or harassment;
- supported another person's complaint;
- gave evidence or information;
- raised a concern under the Equality Act;
- alleged that someone breached equality law; or
- did another protected act connected with equality rights.

Athena GESDA prohibits retaliation against any person who raises a genuine concern or assists an investigation in good faith.

13. Bullying

Bullying may not always be unlawful discrimination, but it is unacceptable.

Bullying may include:

- threats;
- intimidation;
- humiliation;
- persistent unreasonable criticism;
- deliberately undermining someone;
- aggressive communication;
- misuse of authority;
- excluding someone deliberately;
- spreading malicious rumours;
- setting impossible or deliberately unfair expectations; or
- obstructing someone's work without justification.

Reasonable management action, constructive feedback and legitimate performance discussions do not amount to bullying merely because they are unwelcome.

Such action must nevertheless be conducted fairly and respectfully.

14. Recruitment and Selection

Athena GESDA aims to recruit and engage people fairly, transparently and on merit.

We will seek to ensure that:

- role descriptions are clear and relevant;
- selection criteria relate to genuine role requirements;
- advertisements use inclusive language;
- applicants are not discouraged because of a protected characteristic;
- unnecessary age, nationality, physical or personal requirements are avoided;
- recruitment decisions are documented where appropriate;
- reasonable adjustments are available;

- interview questions are relevant to the role;
- assumptions about caring responsibilities or family plans are avoided;
- salary or Fee decisions are fair;
- conflicts of interest are disclosed; and
- personal connections do not improperly influence appointments.

Athena GESDA may use lawful positive action where permitted to address disadvantage or underrepresentation.

Positive action will not mean automatically selecting a person solely because of a protected characteristic.

15. Disability and Reasonable Adjustments

Athena GESDA is committed to making reasonable adjustments for disabled people.

A disability may be visible, non-visible, physical, sensory, cognitive, neurological or related to mental health.

Reasonable adjustments may include:

- altering interview arrangements;
- providing additional time;
- allowing remote participation;
- modifying working hours;
- providing information in an alternative format;
- using accessible technology;
- changing a venue;
- providing rest breaks;
- adapting travel or accommodation;
- modifying duties;
- arranging specialist equipment; or
- allowing support from another person.

Requests will be considered individually and confidentially.

The person requesting an adjustment should provide enough information for us to understand the barrier and consider possible solutions.

Athena GESDA may discuss alternative adjustments where the requested measure is not reasonable or practicable.

16. Employment and Contractor Engagement

Employment and contractor decisions will be based on legitimate factors such as:

- ability;
- relevant experience;
- qualifications;
- performance;
- conduct;
- availability;
- business need; and
- contractual requirements.

Equality principles will apply to:

- pay and Fees;
- allocation of work;
- induction;
- training;
- performance management;
- promotion;
- access to opportunities;
- disciplinary action;
- termination;
- redundancy;
- references; and
- professional development.

Athena GESDA will seek to avoid unjustified disparities in pay or opportunity.

17. Flexible Working and Caring Responsibilities

Athena GESDA recognises that people may have different working patterns and caring responsibilities.

Where practicable and consistent with business needs, we may consider:

- flexible hours;
- remote working;
- hybrid working;
- adjusted meeting times;
- temporary changes to duties;
- part-time arrangements;
- planned breaks; and
- reasonable flexibility for caring or family circumstances.

Not every role or activity can be performed flexibly, particularly where international travel or scheduled Event delivery is required.

Requests will be considered fairly and without assumptions based on sex, age, family status or another characteristic.

18. Religion and Belief

Athena GESDA respects different religions, beliefs and non-religious philosophical beliefs.

Where reasonable, we will seek to accommodate:

- religious observance;
- prayer;
- dietary requirements;
- religious dress;
- religious holidays; and
- scheduling considerations.

Accommodation will be balanced against:

- legitimate business requirements;
- safety;
- operational feasibility;
- the rights of others; and
- applicable law.

Respect for religion or belief does not permit harassment, discrimination or conduct that infringes the rights and dignity of others.

19. Inclusive Communication

Athena GESDA expects communication to be professional and respectful.

Individuals should:

- use people's names correctly;
- make reasonable efforts to pronounce names accurately;
- avoid stereotypes and assumptions;
- avoid offensive or exclusionary language;
- respect appropriately communicated forms of address;
- communicate clearly with international audiences;
- avoid unnecessary jargon;
- provide accessible information where reasonably possible; and
- challenge disrespectful language appropriately.

People will sometimes make genuine mistakes. Such situations should normally be addressed constructively, while repeated or deliberate disrespect may be treated as misconduct.

20. Events, Roadshows and Programmes

Athena GESDA aims to make its Events, roadshows and programmes inclusive and accessible.

Where reasonably practicable, we will consider:

- step-free access;
- accessible toilets;

- hearing or visual requirements;
- dietary needs;
- prayer or quiet spaces;
- accessible presentation materials;
- virtual attendance;
- captioning or interpretation;
- appropriate breaks;
- safe transport;
- gender-sensitive arrangements;
- cultural context;
- safeguarding;
- accessibility of accommodation; and
- timing across different time zones.

Participants should communicate accessibility, dietary or other relevant requirements as early as possible.

We cannot guarantee that every international venue or Partner will provide identical facilities. However, we will seek to identify reasonable alternatives and communicate material limitations.

21. Speakers, Panels and Representation

When selecting speakers, advisers, trainers or panellists, Athena GESDA will consider:

- expertise;
- relevance;
- professional experience;
- diversity of perspective;
- geographic representation;
- institutional representation;
- accessibility; and
- the purpose of the activity.

We will seek to avoid tokenism and will not select an unqualified person solely to create the appearance of diversity.

Where representation is limited, we may consider ways to broaden participation in future programmes.

22. Students and Prospective Students

Athena GESDA will seek to treat students and prospective students fairly and respectfully.

We will not knowingly discriminate in:

- access to information;
- registration;
- engagement activities;
- referrals;
- programme participation;
- communications; or
- student-support activity.

Admissions, scholarships, visas and institutional decisions are generally made by the relevant university, school, government authority or third party.

Where Athena GESDA becomes aware of potentially discriminatory conduct by a Partner, we may raise the concern, seek clarification or reconsider the relationship where appropriate.

23. International Operations

Athena GESDA operates across different countries, cultures and legal systems.

We respect cultural differences but will not treat local custom as justification for:

- unlawful discrimination;
- harassment;
- sexual harassment;
- exploitation;
- violence;
- humiliation;

- exclusion without legitimate reason; or
- conduct that seriously conflicts with this Policy.

Where local law differs from UK equality standards, Athena GESDA will seek a lawful and proportionate approach consistent with its values and responsibilities.

We will consider local risks when planning:

- travel;
- accommodation;
- venues;
- safeguarding;
- public communications;
- Delegate safety;
- accessibility; and
- Partner selection.

24. Suppliers, Agents and Partners

Athena GESDA expects suppliers, agents and Partners to:

- comply with applicable equality and anti-discrimination laws;
- treat people with dignity;
- prevent harassment;
- provide safe working and participation environments;
- consider accessibility;
- respond appropriately to complaints; and
- avoid discrimination in delivering services for Athena GESDA.

Material or repeated breaches may result in:

- investigation;
- corrective action;
- removal of personnel;
- suspension;

- termination of the relationship; or
- referral to an appropriate authority.

25. Marketing and Public Communications

Athena GESDA will seek to ensure that marketing, website content, publications and programme materials:

- avoid harmful stereotypes;
- use respectful language;
- represent international audiences appropriately;
- do not mislead or stigmatise;
- consider accessibility;
- use images with appropriate permission;
- reflect the diversity of our activities where reasonably possible; and
- avoid presenting individuals merely as symbols of diversity.

Marketing decisions will also remain guided by relevance, accuracy and the intended audience.

26. Data and Monitoring

Athena GESDA may collect equality-related information where:

- it is lawful;
- there is a clear purpose;
- collection is proportionate;
- appropriate privacy information is provided; and
- the information is protected securely.

Monitoring may help us understand:

- participation;
- representation;
- accessibility needs;
- recruitment outcomes;

- complaints;
- patterns of disadvantage; and
- the effectiveness of this Policy.

Providing equality-monitoring data will normally be voluntary unless collection is legally required.

Information will be handled in accordance with our Privacy Policy and applicable data-protection legislation.

We will avoid publishing information that identifies individuals unless there is a lawful basis and appropriate safeguards.

27. Responsibilities

27.1. Founder and Chief Executive Officer

The Founder and Chief Executive Officer has overall responsibility for:

- approving this Policy;
- demonstrating leadership;
- promoting inclusive practices;
- ensuring serious complaints are considered;
- allocating proportionate resources;
- reviewing material risks;
- monitoring implementation; and
- approving corrective action.

27.2. Managers and project leads

Managers and project leads must:

- apply this Policy consistently;
- identify accessibility and inclusion requirements;
- prevent and respond to inappropriate conduct;
- take complaints seriously;
- maintain confidentiality;
- escalate serious concerns;

- avoid retaliation; and
- model respectful behaviour.

27.3. Everyone covered by this Policy

All individuals within scope must:

- treat others respectfully;
- comply with this Policy;
- avoid discrimination and harassment;
- cooperate with reasonable adjustments;
- challenge or report serious inappropriate conduct;
- cooperate with investigations;
- maintain confidentiality; and
- complete relevant training or briefings.

28. Raising a Concern

Anyone who believes that they have experienced or witnessed discrimination, harassment, sexual harassment, bullying, victimisation or exclusion connected with Athena GESDA should raise the matter promptly.

Concerns may be reported to:

Founder and Chief Executive Officer

Email: info@athenagesda.org

A report should include, where possible:

- what happened;
- when and where it occurred;
- who was involved;
- whether there were witnesses;
- any supporting messages or documents;
- whether the conduct is continuing;
- whether anyone is at immediate risk; and
- the outcome sought.

A person may initially seek an informal discussion without committing to a formal complaint.

Serious allegations may need to be investigated even where the person reporting them prefers no further action, particularly where others may be at risk.

29. Informal Resolution

Some concerns may be resolved informally where:

- the conduct is relatively minor;
- the person raising the concern feels safe;
- the behaviour may have resulted from misunderstanding;
- no serious risk is present; and
- informal resolution is appropriate.

Informal steps may include:

- explaining that the conduct was unwelcome;
- asking the person to stop;
- clarifying expectations;
- arranging a facilitated discussion;
- providing guidance or training; or
- adjusting working or programme arrangements.

No one will be required to confront the alleged person directly.

Serious allegations, repeated conduct or sexual harassment may require a formal response.

30. Formal Complaints and Investigations

Formal complaints will be handled promptly, fairly and proportionately.

Athena GESDA may:

- appoint an appropriate investigator;
- seek further information;
- interview relevant people;
- review communications and records;

- take interim protective measures;
- obtain professional advice;
- provide each relevant party a fair opportunity to respond; and
- issue findings and appropriate actions.

Interim measures may include:

- separating individuals;
- changing reporting lines;
- adjusting Event participation;
- suspending contact;
- removing a Delegate;
- changing travel arrangements; or
- temporarily suspending an individual or supplier.

Interim action is not a finding of wrongdoing.

31. Confidentiality

Complaints and investigations will be handled as confidentially as reasonably possible.

Information may need to be shared with:

- the investigator;
- relevant witnesses;
- the person complained about;
- advisers;
- insurers;
- regulatory bodies;
- law-enforcement authorities; or
- another organisation responsible for the individual concerned.

Absolute confidentiality or anonymity cannot always be guaranteed.

Everyone involved must avoid:

- unnecessary discussion of the matter;

- interference with witnesses;
- retaliation;
- destruction of evidence; or
- social-media commentary about the complaint.

32. Outcomes and Corrective Action

Where a complaint is upheld or inappropriate conduct is identified, Athena GESDA may take action including:

- an apology;
- facilitated resolution;
- training or coaching;
- revised procedures;
- reasonable adjustments;
- a formal warning;
- removal from an Event;
- reassignment of responsibilities;
- termination of employment or engagement;
- termination of a supplier or Partner relationship;
- reporting to the individual's organisation;
- referral to a professional body; or
- reporting to the police or another authority.

The action taken will depend on:

- seriousness;
- frequency;
- impact;
- intention;
- previous conduct;
- risk to others; and

- applicable contractual and legal obligations.

33. Malicious Complaints

Athena GESDA will not take action against a person merely because a complaint is not upheld.

A complaint made honestly and in good faith will not be considered malicious.

However, deliberately making a false allegation, fabricating evidence or making a complaint in bad faith may result in appropriate action.

34. Protection Against Retaliation

No person will be treated unfairly because they:

- raised a genuine concern;
- made a complaint;
- supported another person;
- acted as a witness;
- requested an adjustment;
- challenged discriminatory conduct; or
- participated in an investigation.

Any suspected retaliation should be reported immediately and may be treated as a serious breach of this Policy.

35. Training and Awareness

Athena GESDA may provide proportionate training, guidance or briefings covering:

- equality law;
- inclusive recruitment;
- reasonable adjustments;
- disability awareness;
- respectful communication;
- harassment and sexual harassment;
- third-party harassment;
- unconscious assumptions;

- inclusive Event delivery;
- handling complaints; and
- responsibilities under this Policy.

People with recruitment, management, Event-delivery or complaint-handling responsibilities may receive additional guidance.

36. Breaches of this Policy

A breach may result in:

- informal corrective action;
- a warning;
- removal from an activity;
- suspension;
- termination of employment or engagement;
- termination of a Contract;
- exclusion from future Events;
- referral to the person's employer or institution;
- legal action; or
- referral to an appropriate authority.

Athena GESDA may terminate a commercial relationship where a Client, supplier, agent or Partner commits a serious or repeated breach.

37. Monitoring and Review

Athena GESDA will monitor the implementation and effectiveness of this Policy proportionately.

Monitoring may include:

- reviewing complaints and outcomes;
- reviewing accessibility requests;
- assessing recruitment practices;
- reviewing Event feedback;
- evaluating Partner conduct;

- monitoring training completion;
- identifying recurring barriers;
- reviewing marketing and communications; and
- considering changes in law or guidance.

The absence of complaints will not necessarily be treated as proof that no concerns exist.

This Policy will be reviewed at least annually and sooner where:

- the law changes;
- the business expands;
- new services or countries are introduced;
- a serious complaint arises;
- monitoring identifies a concern; or
- working arrangements materially change.

38. Approval

This Policy has been approved by the leadership of Athena GESDA Ltd.

Name: Andreea Willmott

Position: Founder and Chief Executive Officer

For and on behalf of: Athena GESDA Ltd

Date: 23 July 2026

39. Contact

Questions, adjustment requests and concerns relating to this Policy should be directed to:

Athena GESDA Ltd

Email: info@athenagesda.org

Website: www.athenagesda.org

Document Control

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