

Equality, Diversity & Inclusion Policy

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Owner	Director of People & Culture
Applies to	All Trust Schools, all Trust staff

Version	Date	Reason
1.0	October 2020	To establish a Trust wide policy
1.1	October 2023	Periodic review
1.2	September 2026	Policy title includes inclusion. Amendments to section 2, 3, 4. New sections 9, 10, 11, appendix 1.

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1. Introduction

1.1 The Trust is committed to providing high quality teaching and learning for our pupils. We recognise that by valuing and promoting equal opportunities in employment for all employees and job applicants, and avoiding unlawful discrimination in employment and delivery of services, we will be able to deliver first class education.

1.2 We aim to create a working environment in which all individuals are able to make best use of their skills, free from discrimination or harassment, and in which all decisions are based on merit. We also value diversity and recognise the varied contributions that a diverse workforce brings to an organisation; we are committed to drawing on different perspectives and experiences of individuals which will add value to what we do.

1.3 We will ensure that we do not discriminate against employees on the basis of age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, religion or belief, sex or sexual orientation (the protected characteristics).

1.4 The principles of non-discrimination also apply to how we expect our employees to treat our employees, pupils, parents and carers, visitors, clients, customers, suppliers and former employees regardless of whether the legal protection of having a protected characteristic applies.

1.5 This policy complies with the requirements of the Equality Act 2010. Under the general public sector equality duty of the Equality Act 2010, our Trust must have due regard to the need to:

- (a) eliminate discrimination, harassment and victimisation;
- (b) advance equality of opportunity between people who share a protected characteristic and those who do not; and
- (c) foster good relations between people who share a protected characteristic and those who do not.

The duty covers the protected characteristics of race, disability, sex, age, sexual orientation, religion or belief, pregnancy and maternity and gender reassignment. The first part of the duty - the duty to eliminate discrimination, harassment and victimisation - also applies to the protected characteristic of marriage and civil partnership. As part of our duty we publish on our website, information relating to any persons who share a relevant protected characteristic who are affected by our policies and practices. We will also publish gender pay gap reporting in line with the regulations.

1.6 As part of the application of this policy, the Trust may collect, process and store personal data and special categories of data in accordance with our data protection policy. We will comply with the requirements of **Data Protection Legislation** (being (i) the General Data Protection Regulation ((EU) 2016/679) (unless and until the GDPR is no longer directly applicable in the UK) and any national implementing laws, regulations and secondary legislation, as amended or updated from time to time, in the UK and then (ii) any successor legislation to the GDPR or the Data Protection Act 1998, including the Data Protection Act 2018) in relation to how we collect, hold and share personal data.

1.7 This policy has been implemented following consultation with the staff and recognised Trade Unions.

1.8 This policy does not form part of any employee's contract of employment and may be amended at any time.

2. Scope, purpose, definitions

2.1 This policy covers all individuals working at all levels and grades in the Trust, including Headteachers, senior leadership, employees, consultants, contractors, trainees, part-time and fixed-term employees, volunteers in governance roles, other volunteers, casual workers and agency staff (collectively referred to as **employees** in this policy).

2.2 This policy applies to all aspects of the employment relationship and covers job advertisements, recruitment and selection, training and development, opportunities for promotion, conditions of service, pay and benefits, conduct at work, disciplinary and grievance procedures, and termination of employment. It also applies to former employees for example in the provision of employment references. This policy focuses on employment and does not cover the provision of services to our pupils/students.

2.3 The purpose of this policy is to set out our approach to equal opportunities, how we will tackle discrimination and how we will put our commitment into action and comply with the law, to ensure that equality and diversity is promoted in the workplace and our employees are not subject to and do not commit unlawful acts of discrimination.

Definitions

2.4 Equality is not about treating everyone the same.

2.4.1 Equality recognises that:

- everyone has individual needs and the right to have those needs respected;
- inequality exists and that unlawful discrimination needs to be tackled;
- employment and Trust services should be accessible to all; and
- It is about treating people fairly where everyone can participate and have the opportunity to fulfil their potential.

2.5 Diversity is about respecting and valuing individual differences.

2.5.1 Diversity recognises that: A diverse approach aims to recognise, value and manage differences to enable all patients, service users and employees to contribute and realise their full potential. Diversity challenges us to recognise and value all sorts of differences in order to make the Trust a better working environment and to ensure that we provide an excellent service for all people.

3.3 Inclusion is about embracing people regardless of their characteristics and ensuring equality of opportunity and removal of discrimination.

3. Roles and responsibilities

3.1 Our Board has overall responsibility for the effective operation of this policy and for ensuring compliance with equality legislation. Day-to-day operational responsibility including regular review of this policy, has been delegated to the CEO.

3.2 All senior leaders must set an appropriate standard of behaviour, lead by example and ensure that those they manage adhere to the policy and promote our aims and objectives with regard to equal opportunities. Senior leaders will be given appropriate training on equal opportunities awareness, and recruitment and selection best practice.

3.3 All employees must be aware of this policy and have a duty to act in accordance with this policy and not to discriminate against or harass other people including employees, former employees and job applicants treating them with dignity at all times. They should also apply this to how they treat members of the public in the provision of services and should support the Trust in meeting its commitment to provide equal opportunities for all and promoting diversity in the workplace.

3.4 If you are involved in management or recruitment, or if you have any questions about the content or application of this policy, you should contact a member of the People Team.

3.5 Staff are invited to comment on this policy and suggest ways in which it might be improved by contacting the People Team.

4. Forms of discrimination

4.1 Discrimination by or against an employee is generally prohibited unless there is a specific legal exemption. Discrimination may be direct or indirect and it may occur intentionally or unintentionally.

4.2 Direct discrimination occurs where someone is treated less favourably because of one or more of the protected characteristics as set out above. In limited circumstances, employers can directly discriminate against an individual for a reason related to any of the protected characteristics where there is an occupational requirement. The occupational requirement must be crucial to the post and a proportionate means of achieving a legitimate aim. It will only be exceptional circumstances that this will apply in our Trust.

4.3 Indirect discrimination occurs where someone is disadvantaged by a provision, criterion or practice that applies to everyone but puts people with a protected characteristic at a particular disadvantage. Such a requirement will need to be objectively justified.

4.4 Harassment related to any of the protected characteristics is prohibited. Harassment is unwanted conduct that has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. Pregnancy and maternity, and marriage and civil partnership are not protected directly under the harassment provisions. However, pregnancy and maternity harassment would amount to harassment related to sex, and harassment related to civil partnership would amount to harassment related to sexual orientation. Harassment is dealt with further in our Anti-Bullying and Harassment Policy and in our Preventing Sexual Harassment at Work Policy.

4.5 The law protects employees, workers, contractors, self-employed staff, apprentices, those undertaking vocational training, volunteers, former workers and job applicants from sexual harassment and the Trust has a duty to take reasonable steps to prevent sexual harassment of its staff at work.

Examples of sexual harassment include, but are not limited to:

- Flirting, gesturing, making sexual remarks about someone's appearance in any means of communication.
- Asking questions about someone's sex life.
- Telling sexually offensive jokes/pranks and or sharing pornographic or sexual images.
- Unwanted touching, kissing or assault.

To report an incident of sexual harassment or to raise a concern please refer to the Preventing Sexual Harassment at Work Policy for details of how the Trust responds to a report of sexual harassment.

4.6 Victimisation is also prohibited. This is less favourable treatment of someone who has complained or given information about discrimination or harassment, or supported someone else's complaint.

4.7 Discrimination by association is where an individual is directly discriminated against or harassed for association with another individual who has a protected characteristic.

4.8 Discrimination by perception is where an individual is directly discriminated against or harassed based on a perception that a person has a particular protected characteristic irrespective of whether they do have that protected characteristic (this does not include marriage and civil partnership and pregnancy and maternity).

4.9 Third-party harassment occurs where an employee is harassed and the harassment is related to a protected characteristic (other than marriage and civil partnership, and pregnancy and maternity), by third parties such as parents and carers, clients or customers.

4.10 Part-time and fixed-term staff should be treated the same as comparable full-time or permanent staff and enjoy no less favourable terms and conditions (on a pro-rata basis where appropriate), unless different treatment is justified.

5. Applying our policy to recruitment and selection

5.1 We aim to ensure that no job applicant suffers discrimination because of any of the protected characteristics. Our recruitment procedures are reviewed regularly to ensure that individuals are treated on the basis of their relevant skills and abilities. Our inclusive recruitment processes are set out in our Recruitment and Selection Policy.

5.2 Job selection criteria as set out in the person specification will be regularly reviewed to ensure that they are relevant to the job. Short listing of applicants should be done by more than one person wherever possible and will be carried out objectively against the requirements of the job.

5.3 Job advertisements should avoid stereotyping or using wording that may discourage groups with a particular protected characteristic from applying.

5.4 We will take reasonable steps, where appropriate depending on the situation, to ensure that our vacancies are advertised inclusively and to a diverse labour market.

5.5 Applicants will not be asked about health or disability before a job offer is made, other than where it is necessary to;

- (a) establish if an applicant can perform an intrinsic part of the job (subject to any reasonable adjustments).

- (b) establish if any reasonable adjustments need to be made to enable an applicant to have a fair interview or assessment.

- (c) carry out equal opportunities monitoring (which will not form part of the decision making process).

Job offers will be conditional upon a satisfactory medical check in accordance with our obligation under Keeping Children Safe in Education, where a school must verify the candidate's mental and physical fitness to carry out their work responsibilities in accordance with the Education (Health Standards) (England) Regulations 2003.

5.6 Applicants will not be asked about past or current pregnancy or future intentions related to pregnancy. Applicants will not be asked about matters concerning age, race, religion or belief, sexual orientation, or gender reassignment.

5.7 We are required by law to ensure that all employees are entitled to work in the UK. Assumptions about immigration status should not be made based on appearance, name or apparent nationality. All prospective employees, regardless of nationality, must be able to produce original specified documents before employment starts to satisfy current immigration legislation.

5.8 To ensure that this policy is operating effectively, and to identify groups that may be underrepresented or disadvantaged in our Trust, we monitor diversity data as part of the recruitment process. Provision of this information is voluntary and it will not adversely affect an individual's success at recruitment or any other decision related to their employment. The information is removed from applications before short listing, and kept in an anonymised format solely for the purposes stated in this policy. Analysing this data helps us take

appropriate steps to avoid discrimination and improve equality and diversity.

6. Applying our policy to training, promotion, pay decisions and conditions of service

6.1 Employees training needs will be identified through the appraisal process. All employees will be given appropriate access to training for their job and in order to enable them to progress within the Trust.

6.2 Pay and promotion decisions will be based on an employee's performance (where relevant), skills and experience and as detailed in our Pay policy.

6.3 Our benefits and facilities are reviewed regularly to ensure that they are available to all employees who should have access to them and that there are no unlawful obstacles to accessing them.

6.4 Relevant national and local conditions of service as applied to our employees, will meet the requirements of equal opportunities.

7. Applying our policy when terminating employment

7.1 We will ensure that redundancy criteria and procedures are fair and objective and are not directly or indirectly discriminatory.

7.2 We will also ensure that disciplinary procedures and penalties are applied without discrimination, whether they result in disciplinary warnings, dismissal or other disciplinary action.

8. Disability discrimination

8.1 Disability discrimination includes direct or indirect discrimination, any unjustified less favourable treatment because of the effects of a disability, and failure to make reasonable adjustments to alleviate the effects caused by a disability.

8.2 If you are disabled or become disabled, we encourage you to tell us about your condition so that we can support you as appropriate.

8.3 If you experience difficulties at work because of your disability, you may wish to contact your line manager or Headteacher to discuss any reasonable adjustments that would help overcome or minimise the difficulty. Your line manager or Headteacher may wish to consult with you and your medical adviser(s) about possible adjustments. We will consider the matter carefully and try to accommodate your needs within reason. If we consider a particular adjustment would not be reasonable we will explain our reasons and try to find an alternative solution where possible.

8.4 We will monitor the physical features of our premises to consider whether they place disabled employees or job applicants at a substantial disadvantage compared to other employees. Where reasonable, we will take steps to improve access for employees who have a disability.

8.5 As a Disability Confident Employer, we are committed to inclusivity and accessibility. We guarantee to interview a disabled applicant, provided they meet the minimum criteria for the job. This applies to all internal and external vacancies.

9. Staff Network Support Groups

In order to support and encourage staff to value diversity we provide staff opportunity to join forums focussed on a particular aspect of equality, diversity and inclusion. The primary focus of these groups is to raise awareness, provide support and to encourage knowledge and understanding.

10. Equality Impact Assessments (Appendix 1)

10.1 The Trust has an equality assessment process which assesses services, employment policies, business practices and change management to determine any adverse impact on the protected characteristics.

The assessment will be in line with the Equality Act 2010, the Mental Capacity Act 2005, and other relevant equalities legislation.

11.0 Reasonable Adjustments

11.1 The Trust is committed to supporting employees with disabilities, neurodivergence, long-term health conditions, or those experiencing the menopause to remain in or return to work. This support extends to all stages of the menopause, including perimenopause and post-menopause.

In accordance with Section 20 of the Equality Act 2010, the Trust has a proactive legal duty to make "reasonable adjustments" where a workplace provision, criterion, or practice (PCP) puts a staff member at a substantial disadvantage. New Requirement (April 2027): In line with the Employment Rights Act 2025, the Trust further recognises its duty to provide specific support for employees experiencing menopausal symptoms. This includes the statutory right to a Menopause Action Plan (MAP), which serves as a formal framework for identifying and implementing tailored adjustments.

This duty comprises three requirements:

- **Changing Provisions, Criteria, or Practices:** Adjusting how work is organised, such as amending a Lead Practitioner's specific responsibilities or a teacher's timetable.
- **Physical Features:** Altering the physical environment (e.g., ventilation, temperature control, or proximity to facilities).
- **Auxiliary Aids:** Providing specialised equipment or support services.

11.2 The requirement for adjustments or a Menopause Action Plan (MAP) may be identified through several channels:

- **Return-to-Work Interviews:** Conducted following any long-term sickness absence.
- **Occupational Health (OH) Referrals:** Where an OH report advises on modifications.
- **Self-Referral:** Employees are encouraged to proactively request a MAP or adjustment.
- **Confidential Disclosure:** Staff may choose to speak to a designated Menopause Champion or HR representative if they prefer not to disclose initially to their Headteacher/line manager.
- **Knowledge Trigger:** The legal duty arises as soon as the Trust knows, or could reasonably be expected to know, that an employee has a disability or is experiencing health-related barriers.

11.3 The Process for Implementation:

- **Consultation:** The Headteacher/Line Manager, supported by the People HR team, will meet with the employee to discuss barriers. For menopause-related support, this discussion will form the basis of the Statutory Menopause Action Plan.
- **Joint Risk Assessment:** A Risk Assessment must be completed. For menopause-related adjustments, this should specifically consider workplace temperature, dress code/uniform flexibility, and access to rest areas/hydration.
- To ensure continuity and consistency of support, all agreed adjustments will be recorded in a **Workplace Adjustment Passport**. This document belongs to the employee and should be used to facilitate transitions between roles or managers within the Trust,

ensuring that support remains seamless and that the burden of disclosure is minimised for the staff member.

- **Manager Support:** Managers will be provided with the 'Guidance Note for Facilitating Adjustment Meetings' to ensure a consistent, empathetic, and legally compliant approach across the Trust.
- **Evaluating "Reasonableness":** While Occupational Health provides recommendations, the Trust determines what is "reasonable" based on Section 189 of the Equality Act, considering:
 - The effectiveness of the adjustment in removing the disadvantage.
 - Operational practicability and impact on pupil education.
 - The financial impact and available Trust resources.

**Workplace Adjustment Passport Template is found in the Google Template Documents Library.*

11.4 Adjustments are tailored to the individual and may include temporary or permanent adjustments such as:

- **Phased Returns:** A gradual increase in hours or duties.
- **Environmental Changes:** Provision of fans, desks near windows, or modified uniforms/dress code flexibility, noise-canceling equipment, modified lighting, or designated quiet spaces. Classroom-base.
- **Flexible Working:** Moving to a part-time contract, adjusting start/finish times.
- **Organisational:** Assistance with workload prioritisation, use of assistive software (e.g., speech-to-text), or digital organisers.
- **Communication/Management Styles:** Advance notice of meeting agendas, clear written directives, and the option to contribute to meetings via written form rather than verbal.
- **Alterations to Duties:** Relinquishing specific management responsibilities, or breaktime duties, or adjusted lesson observations.
- *This list is not exhaustive.*

11.5 Where a reasonable adjustment results in a permanent change to an employee's grade, pay, or responsibilities, such as moving from a Leading Practitioner Pay Range to the Upper Pay Scale, this constitutes a formal Variation of Contract.

- In accordance with the STPCD and The Burgundy Book, any such changes will be recorded in an updated Statement of Particulars within one month.
- Voluntary relinquishment of responsibilities to accommodate health or menopausal needs will be processed as a permanent change unless otherwise agreed in writing as a temporary trial.

11.6 All adjustments and Menopause Action Plans will be reviewed at regular intervals (at least each academic year) to ensure they remain effective and sustainable. Menopause-related data is handled as Special Category Data under GDPR 2018 and the Trust's Data Protection Policy.

11.7 Access to Work Scheme:

To supplement the internal reasonable adjustments provided by the School/Trust, staff are encouraged to explore the support available through the government's Access to Work scheme. This scheme can provide practical and financial support, such as:

- Specialist equipment or software.
- Support workers (e.g., BSL interpreters or job coaches).
- Additional travel-to-work costs if public transport cannot be used.
- Mental health support services.
- Specialist Strategy Coaching for neurodivergent employees and their managers to help

develop effective workplace systems.

As the Access to Work grant is personal to the individual, **it is the responsibility of the employee** to initiate the application process. Staff are encouraged to:

- **Check Eligibility:** Visit the [Gov.uk Access to Work portal](#) to confirm eligibility.
- **Lead the Application:** Submit the initial application to the Department for Work and Pensions (DWP).
- **Share Recommendations:** Once an assessment is completed, staff should share the DWP's report and recommendations with their Headteacher/Line Manager and the People HR team so that the school/Trust can facilitate the implementation of the suggested support.

The school/Trust will support staff during the application process by providing any necessary workplace information required by the DWP. We will work collaboratively with the employee to review the Access to Work recommendations and will aim to implement them wherever it is reasonable and practicable to do so.

11.8 Diagnosis and Evidence: The Trust adopts a "Social Model" approach to disability and inclusion. We recognise that both neurodivergent assessments and menopause specialist appointments can have significant waiting times. Therefore, a formal medical diagnosis is not a prerequisite for the commencement of a Menopause Action Plan or Neurodiversity support. The Trust will focus on the functional impact of the barriers an employee faces. While Occupational Health advice may be sought to refine support, the implementation of "low-cost, high-impact" adjustments should not be delayed pending a clinical label.

12. Breaches of this policy

12.1 If you believe that you may have been discriminated against you are encouraged to raise the matter through our Grievance Procedure. If you believe that you may have been subject to harassment you are encouraged to raise the matter through our Anti-harassment policy. If you are uncertain which applies or need advice on how to proceed you should speak to your Headteacher or other senior leader.

12.2 Allegations regarding potential breaches of this policy will be treated in confidence and investigated in accordance with the relevant procedure. Employees who make such allegations in good faith will not be victimised or treated less favourably as a result. False allegations which after investigation are found to have been made in bad faith will, however, be dealt with under our Disciplinary Procedure.

12.3 Any member of staff who after investigation is found to have committed an act of discrimination or harassment will be subject to disciplinary action. Such behaviour may constitute gross misconduct and, as such, may result in summary dismissal. We take a strict approach to serious breaches of this policy.

13. Review of policy

This policy is reviewed by the Trust every three years. We will monitor the application and outcomes of this policy to ensure it is working effectively.

APPENDIX - 1

Equality Impact Assessment/ Analysis (EIA)

Step 1: Scoping and Identifying the Aims

School/Service	People Department
Title of Change:	Equality, Diversity, Inclusion Policy
What are you completing this EIA for?	Policy
Is this a new or existing activity or change?	Existing
What are the main aims / objectives of the changes?	Ensure policy is still relevant and the most current legislation is being adhered to.
What is the context for this EIA? e.g., policy, practice, service, curriculum proposal or project?	
Why is the activity/change needed? E.g., The policy or practice affect different “protected groups” differently?, enhancing of services, education	
Name/s of people and Date undertaking analysis:	Shani Davies, Director People & Culture
Who will be affected by this activity/change? eg pupils/students, service users, employees, wider community	All Staff in scope of this policy
Does it relate to an area with known inequalities? E.g., access to service for disabled people, pupils/students, vulnerable pupils/students, SEND, racist bullying etc.	
EIA Schedule When will the EIA be reviewed?	

Step 2: Assessing the Impact

Detail any positive or negative impacts of this document /policy on pupils/students and staff in the box below. If there is no impact, please select “not applicable”

Protected Characteristic	Positive Impact(s)	Negative Impact(s)	NA	Action to address negative impact: (e.g. adjustment to the policy)
Sex consider issues for: men and women, non-binary.	Y			
Gender reassignment E.g. privacy of data and harassment	Y			
Disability e.g., attitudes, physical, social barriers, visible and non-immediately visible disabilities, neurodivergence, learning disability	Y			
Age e.g., consider all ages but there may be some issues that relate for example to older people/younger people	Y			
Sexual Orientation consider heterosexual as well as lesbian, gay and bisexual (and other sexual orientations)	Y			

Pregnancy and maternity e.g., childcare, working arrangements, part time working	Y			
Marriage and civil partnership	Y			
Religion or belief consider religions, beliefs, or no belief	Y			
Ethnicity / Race e.g., language barriers, different ethnic groups/nationalities	Y			
Socio-economic factors e.g., resident status – socio economic/low-income groups, migrants, carers, impacts on children and families (please state)	Y			
Mental health e.g. short term, long term, acute, fluctuating mental health conditions, impacts	Y			

If you answer yes to any of the following, you MUST complete the evidence column explaining what information you have considered which has led you to reach this decision.

Assessment Questions	Yes / No	Please document evidence / any mitigations
In consideration of your document development, did you consult with others, for example, external organisations, employees, pupils/students, carers or community groups?	Yes	Staff and Trade Unions
Have you taken into consideration any regulations, professional standards?	Yes	Equality Act 2010, Mental Capacity Act 2005, Employments Right Act 2025

Step 3: Review, Risk and Action Plans

Low – No major change	Medium - Adjust the policy	High – Stop and remove	
The activity is robust and there is no potential for discrimination, and you have taken all appropriate opportunities to advance and foster relations between groups.	This involves taking steps to remove barriers or to better advance equality. It can mean introducing measures to mitigate the potential effect.	If there are adverse effects that are not justified and cannot be mitigated, you will want to consider stopping the policy/project altogether. If the activity shows unlawful discrimination, it must be removed or changed.	
How would you rate the overall level of impact / risk to the school / service / Trust if no action was taken?	Low x ☐	Medium ☐	High ☐
What action needs to be taken to reduce or eliminate the negative impact?	N/A		
Who will be responsible for monitoring and regular review of the document / policy / change?	Director People & Culture		

Step 4: Authorisation and sign off

I am satisfied that all available evidence has been accurately assessed for any potential impact on pupils/students and employees with protected characteristics in the scope of this project / change / policy / procedure / practice / activity. Mitigation, where appropriate has been identified and dealt with accordingly.

Equality Assessor:

Shani Davies

Date:

19/2/26

