



## Equality, Diversity and Inclusion Policy

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## Contents

<b>1.</b>	<b>Introduction</b>	<b>3</b>
<b>2.</b>	<b>Scope and Purpose</b>	<b>3</b>
<b>3.</b>	<b>Legal Framework</b>	<b>3</b>
	<b>3.1 Roles and Responsibilities</b>	<b>4</b>
	<b>3.2 Public Sector Duty</b>	<b>5</b>
	<b>3.3 Academies</b>	<b>6</b>
	<b>3.4 Employment</b>	<b>6</b>
<b>4.</b>	<b>General Principles</b>	<b>7</b>
<b>5.</b>	<b>Framework</b>	<b>7</b>
<b>6.</b>	<b>Public Reports</b>	<b>8</b>
	<b>6.1 Equality Action Plan</b>	<b>8</b>
	<b>6.2 Gender Pay Gap</b>	<b>8</b>
<b>7.</b>	<b>Policies and Practice</b>	<b>8</b>
<b>8.</b>	<b>Academy/School Admissions</b>	<b>8</b>
<b>9.</b>	<b>Competitive Sport and Sex Discrimination</b>	<b>9</b>
<b>10.</b>	<b>Occupational Requirement</b>	<b>9</b>
<b>11.</b>	<b>Academy/School Curriculum</b>	<b>9</b>
<b>12.</b>	<b>Religious Observance</b>	<b>9</b>
	<b>12.1 Collective Religious Worship</b>	<b>9</b>
<b>13.</b>	<b>Pupils with a Declared Disability</b>	<b>9</b>
<b>14.</b>	<b>Reporting an Allegation</b>	<b>10</b>
	<b>14.1 Resolving Disputes</b>	<b>10</b>
	<b>Appendix 1 – Language and Definitions</b>	<b>12</b>
	<b>Appendix 2 – Equality Action Plan Guidance</b>	<b>16</b>
	<b>Appendix 3 – Equality Analysis</b>	<b>20</b>
	<b>Appendix 4 – Accessibility Plan</b>	<b>22</b>

## 1. Introduction

The University of Chichester Academy Trust ('the Trust') recognises and celebrates the diversity of its academies and the communities they serve. We are committed to fostering a culture of respect, inclusivity, and equity where all individuals can thrive. This policy supports a vibrant, inclusive and aspirational learning environment that values diversity and promotes equality.

## 2. Scope and Purpose

This Policy covers all individuals working at all levels, including staff, consultants, contractors, trainees, home-workers, part-time and fixed-term staff, volunteers, the governing board, casual workers, and agency staff. It also applies to the wider community such as children, job applicants, ambassadors, and parents/guardians.

The purpose of this policy is to set out our approach to promoting equality, diversity and inclusivity and how we will tackle discrimination and challenge social exclusion. It explains how we will put our commitment into action and comply with the law to ensure that equality and diversity are promoted in our academies and that our staff, children, and community are not subject to, and do not commit, unlawful acts of discrimination.

## 3. Legal Framework

This policy complies with the Equality Act 2010, which introduced the Public Sector Equality Duty and protects people from discrimination and incorporates additional statutory and best-practice guidance including;

- Online Safety Act 2023
- SEND Improvement Plan 2023–2025
- ICO and Equality and Human Rights Commission and guidance on algorithmic fairness and responsible use of AI

This policy is also based on the Department for Education (DfE) advice for academies on the Equality Act, the technical guidance for academies from EHRC and guidance from the Government Equalities Office on meeting the specific duties that support the Public Sector Equality Duty.

The legal duties to eliminate harassment and foster good relations make it clear that Academies must address bullying and prejudice-related incidents, based on a protected characteristic, such as racism or homophobic bullying. The expectation in law is not only for academies to respond when an incident occurs, but to also take steps to prevent those incidents from occurring or escalating under the Workers Protection (Amendment of Equality Act 2010) Act 2023

The Trust will ensure that it follows its legal obligations in respect of the Equality Act 2010 and associated statutory duties including; having measures to encourage good behaviour and prevent all forms of bullying amongst children. These measures should be part of the academy's behaviour or relational policy which must be communicated to all children, staff and parents/guardians.

Determining the measures to be taken with a view to regulating the conduct of pupils at a time when they are not on the premises of the academy and are not under the lawful control

or charge of a member of the staff of the academy., these incidents may be reported to the local authority.

The DfE's Keeping Children Safe in Education guidance reiterates the expectations and obligations of academies:

- All staff are to be aware of systems within their Academy which support safeguarding and these need to be explained as part of staff induction. This should include a behaviour policy that should outline measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying.
- To focus on key issues of concern and how to improve children's outcomes. Some children may be more at risk of harm from specific issues such as sexual violence, homophobic, biphobic, or transphobic bullying or racial discrimination. Such concerns will differ between academies, but it is important all academies are conscious of disproportionate vulnerabilities and integrate this into their safeguarding policies and procedures.
- It is important that academies consider sexual harassment in broad terms. Sexual harassment (as set out in Appendix 1) creates a culture that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence.

It also reminds us to recognise, by providing suitable CPD, the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from bullying, grooming and radicalisation, and are confident they have the capability to support children.

### **3.1. Roles and Responsibilities**

#### **Executive Team**

- Ensure that the equality information as set out in this statement is published and communicated throughout the Trust, including to staff, pupils/children, governors and parents/carers.
- Ensure that the published equality information is updated at least every year, and that the objectives are reviewed and updated at least every four years.
- Delegate responsibility for monitoring the achievement of the objectives in each academy on a daily basis to the Headteacher / Head of academies and delegate responsibility for monitoring progress of the objectives to the Local Governing Body.

#### **Local Governing Board**

- Discuss regularly with the Headteacher / Head of Academy any issues and how these are being addressed, ensuring that the academy is complying with equality-related legislation.
- Ensure that the policy and its procedures are implemented by the Headteacher.
- Ensure all other academy policies promote equality.
- Agree and monitor the equality objectives and monitor the progress of the academy's equality objectives as set out in their action plan.
- Attend appropriate equality and diversity training.
- Report back to the Executive Team regarding any issues.

### Headteacher

- Write and implement equality information and objectives statement and academy action plan.
- Implement the policy and its related procedures among the staff and pupils to ensure they understand the objectives and are aware of the process for reporting any bullying and prejudice-related incidents, ensuring the staff complete the appropriate training where applicable.
- Take appropriate action in any case of actual or potential discrimination.
- Ensure staff understand their duties regarding recruitment and providing reasonable adjustments. It is unlawful for an employer to enquire about the health of an applicant for a job until a job offer has been made unless the questions are specifically related to an intrinsic function of the work.

### All staff

- Enact this policy, its commitments and procedures to achieve the objectives set in the academy's action plan.
- Deal with bullying and discriminatory incidents and know how to identify and challenge prejudice and stereotyping.
- Promote equality and good relations and not discriminate on any grounds.
- Attend such training and information opportunities as necessary to enact this policy and keep up to date with equality legislation.
- To be models of equal opportunities through their words and actions.

### Children

- Refrain from engaging in discriminatory behaviour or behaviour that contravenes this policy.

### Visitors (e.g. parent/ carers, contractors)

- To be aware of, and comply with, the Trust Equality, Diversity and Inclusion Policy.
- To refrain from engaging in discriminatory behaviour or language on academy premises.

### 3.2. Public Sector Duty

- The Trust is committed to the public sector duty or 'general duty' to have due regard to the need to:
- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equalities Act.
- Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

As further set-out in the Act, the Trust in its commitment to advance equality of opportunity must have due regard to:

- remove or minimize disadvantage suffered by persons who share a relevant protected characteristic and that are connected to that characteristic.
- take steps to meet the needs of persons who share a relevant protected characteristic which are different from the needs of persons who do not share that characteristic;
- encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

In order to address this duty, the Trust will exercise its right to take positive action where it can evidence that specific groups are disadvantaged in their learning, or under-represented in the workplace or in other areas that can influence school activity, e.g. Local Governing Body and parent focus groups.

### **3.3. Academies**

Part 6, Chapter 1 of the Act covers all academy activities such as extracurricular and leisure activities, afterschool and homework clubs, sports activities and academy trips, as well as academy facilities such as libraries and IT facilities. The Act also covers arrangements of tests, assessments or examinations, or in the way in which the academy provides career education, information, advice or guidance, or work placements.

The protected characteristics of Age, Marriage and Civil Partnerships do not apply to academies in regard to it being unlawful for an academy to discriminate against, whether directly or indirectly, harass or victimise a pupil or potential pupil:

- in the way in which it provides education for the pupil;
- in the way in which it affords the pupil access to a benefit, facility or service;
- by not providing education for the pupil;
- by not affording the pupil access to a benefit, facility or service; or
- by subjecting the pupil to any other detriment.

### School Centered Initial Teacher Training (SCITT)

Portsmouth SCITT operate an additional policy for EDI which aligns with our Trust. The EDI policy operated by SCITT can be accessed by request to Director: Teacher Education and Development.

### **3.4. Employment**

The Trust is committed to ensuring:

- it will not discriminate against a person, or victimise a person, in the arrangements of both deciding who is offered employment and who is not.
- it will not discriminate against an employee, or victimise an employee in terms of their employment including opportunities for promotion, transfer, training or any other benefit, facility or service, or in dismissing an employee.
- it will support and make reasonable adjustments where required.
- a candidate or employee is not harassed by, nor harasses, another employee, nor is an employee subject to harassment by a third party.
- contract workers receive the protection afforded to them under para. 41 of the Act.

### **3.5. Services and Public Functions**

Noting the exceptions as detailed in the Act, the Trust will uphold its commitment to Part 3 of the Act, in its activities in providing services and facilities.

**Appendix 1** outlines the language and definition of discrimination, harassment, victimisation and positive action for the purpose of the Act.

## 4. General Principles

The Trust believes:

- There is no place for discrimination within its Trust, be it in relation to employment, education, research or in its learning environment. This includes all contractual service providers and collaborative partners, who are required to adhere to equality legislation when providing goods, facilities or services.
- Promoting equality of opportunity will better enable staff and pupils to reach their full potential.
- For the benefit of the Trust, employees and pupils should feel able to express their own identity without fear of abuse or discrimination.
- It is important to acknowledge and celebrate the breadth of experience and intellectual resources that people from diverse backgrounds bring to the life of the Trust.
- Creating an ethos which promotes equality, develops understanding and challenges myths, stereotypes, misconceptions and prejudices is important.
- Monitoring, evaluating and reviewing progress and impact of actions will create a cycle of continuous improvement to advance equality, diversity and inclusivity.
- Mandatory training will raise awareness and enable individuals to be equipped to recognise and challenge assumptions, stereotyping and undertake action that will actively develop the Trust as a culturally diverse and inclusive organisation.

## 5. Framework

To meet our legal obligations and drive the equality agenda forward, the Trust has established a framework. Headteachers and Senior Leaders will consider how best to embed a culture in which equality of opportunity, diversity and inclusivity is valued and celebrated, taking the lead to 'champion' the equality agenda.

Each Local Governing Body will review and challenge its leaders in regard to their equality action plan and level of progress in advancing the EDI agenda, ensuring compliance with its obligations.

The Curriculum and Standards Committee will monitor and review the progress and actions to address equality, diversity and inclusivity related to the curriculum, extra curricula activity and pupil provision and resources. The Curriculum and Standards Committee will receive an overview each year from the academy in order to hold Trust leaders to account.

The Finance and Audit Committee will monitor and review the progress and actions connected with the workforce and service provision. The Finance and Audit Committee will receive an overview each year in order to hold Trust leaders to account.

The Curriculum and Standards Committee and the Finance and Audit Committee represent the Board who are the responsible body liable for any breaches of the Act.

Each academy will complete an equality action plan on a four-year cycle to address the specific needs of their academy and community that:

- Addresses inequalities of outcome which result from socio-economic disadvantage, which will differ in each academy.
- Creates a culture in which discrimination, unfair treatment and disadvantage is not tolerated.
- Focuses on diversity, taking pro-active measures to address under-representation, or in activities that inform or influence the academy's Journey to Excellence Plan.

Any information on equality matters published on academy websites needs to be reviewed and updated on an annual basis.

**Appendix 2** provides guidance and a template for academies to complete.

The Trust will utilise data to help inform its EDI strategy and future development of any policies, guidance and action plans. The data will be collected from a range of resources, including but not limited to staff surveys, data collation from recruitment campaigns, DfE data, census data, pupil and parental questionnaires, and research and information drawn from a broad range of known expertise in specific areas of EDI. In relation to data concerning pupils, this would be resourced from attainment, attendance, suspensions and exclusions data.

## 6. Public Reports

### 6.1 Equality Action Plan

The Act sets out a specific requirement for academies:

- (a) to publish information to demonstrate how they are complying with the Public Sector Equality Duty, and
- (b) to prepare and publish equality objectives

This will be achieved through the academies producing an equality action plan, as detailed in this policy.

In setting out this requirement, the government has stated that it should not be overly burdensome on academies and will not be required to collect any statistical data which they do not already collect routinely. **Appendix 2** provides information to guide academies.

### 6.2 Gender Pay Gap

To advance gender equality, the Trust will complete an annual analysis and report to the Trust's Finance and Audit Committee on the Gender Pay Gap for the Trust as a whole. In line with statutory reporting, the Trust will submit a return to the DfE and publish its summary report on its website.

## 7. Policies and Practice

The Trust is committed to the equality, diversity and inclusivity movement and believes that, in order to fully effect change, the principles of equality, diversity and inclusion should be reflected in its ethos and embedded in its policies and practices; not delivered as a 'tick box exercise' to satisfy regulations.

To enable all staff and pupils to reach their full potential, the Trust further reflects on the Act when considering certain practices.

## **8. Academy/School Admissions**

The discrimination provisions on age do not extend to academy admissions. Current approaches in which admissions and transition between academies are determined by a child's age will not be open to challenge.

When determining admissions, the academies where they are able to will also consider if pupils from a protected group receive less favourable treatment.

## **9. Competitive sport and sex discrimination**

The Act includes an exception for sex discrimination in relation to a competitive sport, game or other competitive activity. It will therefore be for the academy to determine whether for sporting competitions in which physical strength, stamina or physique are significant factors in determining success or failure, that separate events for boys and girls are held. However, academies must not preclude participation in a given sport on the grounds of sex.

## **10. Occupational Requirement**

The Equalities Act further allows discrimination because of a person's sex if someone of a particular sex is required for reasons of privacy and decency, or where personal services are provided.

## **11. Academy Curriculum**

Whilst the content of the taught curriculum is outside of the Act, the way in which our academies provide education and the delivery of the curriculum is included. Each academy takes active steps to ensure that content and resources in all areas of the curriculum are inclusive, representative of modern Britain and promote a greater understanding of equality and diversity. There is acknowledgement of the importance of challenging stereotyping and discrimination in all areas of the curriculum.

Academies monitor pupils' attainment and progress by socio-economic background, ethnic group, by gender, EAL, SEND and other focus groups, believing that no group should be regarded higher than another, and tracking these groups help to ensure equity and target positive action.

## **12. Religious Observance**

The Trust will be supportive and enable, where it is able to, the needs of both pupils and staff to participate in religious observance where it is a fundamental part of their faith.

### **12.1 Daily Collective Worship**

The religion or belief provisions of the Act do not cover the daily act of collective worship. To raise awareness and for inclusivity, however, the Trust encourages its academies to celebrate a range of religious festivals and non-religious events to raise pupil awareness of differing faiths and non-religious beliefs.

## **13. Pupils with a declared disability**

The Trust understands that the definition of disability is not the same as the definition of special education needs in s20 of the Children and Families Act 2014, and recognises the

importance of the need to treat pupils with a disability differently where it would put the pupil on more level footing with pupils without a disability.

Academies will consider providing auxiliary aids and services as a reasonable adjustment for pupils where these are not supplied through EHCPs, or from other sources in line with EHRC published guidance. When considering reasonable adjustments, it is understood that the duty is anticipatory.

Academies will take responsibility to undertake accessibility planning (**Appendix 4**) for pupils including emergency evacuation plans.

Although ordinarily, the interests of other pupils regarding the reasonable adjustments required by a disabled pupil will be irrelevant, the Trust recognises there may be limited circumstances in which the provision of a particular reasonable adjustment for a disabled pupil will disadvantage other pupils. In such a case, the academy may decide that it is not reasonable to make the adjustment.

## 14. Reporting an Allegation

Individuals should feel able to inform an appropriate person wherever inappropriate or discriminatory practice occurs, without fear of retribution and in the knowledge that the matter will be handled effectively under the Trust's policies and procedures. The Academy will be responsible for informing individuals of the named contact.

The Trust will treat any contravention or breach of this Policy very seriously and take appropriate action wherever it is justified.

Where a staff member, pupil or any other stakeholder covered by this policy who, in bad faith, gives false information or evidence (that is, information or evidence that he or she knew was false), or alleges that was false and made in bad faith, they would not be protected against victimisation. The original complaint or claim would not be affected, provided that it was not made in bad faith.

### 14.1. Resolving Disputes

Whilst the Trust would encourage, in the best interests of everyone, to attempt to resolve any disputes informally, where this may not be possible, the following policies should be referred to:

<b>Related to Pupils</b>	Complaints Policy	Available from the Academy or from <a href="http://unicat.org.uk">unicat.org.uk</a>
<b>Related to Employees</b>	Grievance Policy Disciplinary Policy Whistleblowing Policy	Available from the Business Manager or from <a href="mailto:unicathr@chi.ac.uk">unicathr@chi.ac.uk</a>

The Policies will be available in different languages or formats, if appropriate and requested.

If the dispute relates to alleged discrimination, it must be reported within six months of the alleged discrimination. Where there has been a continuing process of discrimination taking place over a period of time, the six months will begin at the date of the last discriminatory act.

Guidance documents to help navigate disputes and helping employees return to work have been produced by the Women and Equalities Unit and can be found on the link below.  
<https://www.gov.uk/government/organisations/women-and-equalities-unit>

Parents/Carers can make a complaint to Ofsted if the complaint affects the academy as a whole rather than an individual pupil. Ofsted will not deal with complaints where there is an alternative legal remedy.

### **Further information**

[The Equality Act 2010 and schools, DfE](#)

[Equality Act 2010: guidance, GOV.](#)

[Technical Guidance for Schools in England, EHRC.](#)

[Gender separation in mixed schools \(Non-statutory guidance\), DfE.](#)

[SEND code of practice: 0 to 25 years, DfE/DoH.](#)

Under the Act, it is unlawful to discriminate against, harass or victimise someone because they have or are perceived to have a 'protected characteristic' or are associated with someone who has a protected characteristic.

## **1. Protected Characteristics**

### **Age**

A person belonging to a particular age or range of ages.

### **Disability**

A person is defined under the Act as disabled if he or she has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.

The length of time for which the effect of the condition has lasted or will continue must be 'long term', which means that an impairment is likely to last for the rest of the person's life, or has lasted at least 12 months, or the total period for which it lasts is likely to be at least 12 months. If the person no longer has the condition, but it is likely to recur, or if the person no longer has the condition, he or she will be considered to be a disabled person.

The activities upon which the impairment has a substantial adverse effect must be 'normal day-to-day activities'. Just because the activity is mainly undertaken at work does not mean that it is not a normal day-to-day activity.

'Substantial' means more than minor or trivial. The condition must have this impact without taking into account the effect of any medication that the person is taking, or any aids or assistance or adaptations that he or she uses, like a wheelchair, walking stick, assistance dog or special computer software. The exception to this is the wearing of glasses or contact lenses, for which it is the effect while the person is wearing the glasses or contact lenses that is considered.

The Act's definition of disability is not the same as the definition of special educational needs in section 20 of the Children and Families Act 2014. The Children and Families Act 2014 states that, 'a child or young person has special educational needs if he or she has a learning difficulty or disability which calls for special educational provision to be made for him or her'. In relation to school-age children, the learning difficulty could mean that they have much greater difficulty in learning than the majority of their peers, and/or that a disability stops or hinders them from using the educational facilities typically available in schools in the area. There will be some pupils who are covered by the Equality Act 2010's definition of disability, but not the Children and Families Act 2014's definition of special educational needs, and vice versa, although a significant number of pupils are covered by both.

### **Gender reassignment**

Refers to a process where an individual's gender identity differs from the sex they were assigned at birth, and they take steps to align their outward presentation and/or physical characteristics with their preferred gender.

By law someone has the protected characteristic of gender reassignment if they:-

- Are proposing to transition or partly transition
- Are transitioning
- Have transitioned or partly transitioned

### **Race**

Race refers to a group of people defined by their race, colour and/or nationality (including citizenship), ethnic or national origins.

Racial groups can comprise two or more distinct racial groups, such as 'British Asians'.

### **Religion or belief**

This refers to any religion, including a lack of religion. Belief refers to any religious or philosophical belief and includes a lack of belief.

A belief need not include faith or worship of a god or gods but must affect how a person lives his or her life or perceives the world.

### **Sex**

A person's sex refers to the fact that he or she is male or female.

### **Sexual orientation**

Sexual orientation means the attraction that a person feels towards one sex or another (or both), which determines with whom he or she forms intimate relationships or to whom he or she is attracted.

Sexual orientation discrimination also covers discrimination connected with manifestations of that sexual orientation, such as someone's appearance, the places that he or she visits or the people with whom he or she associates.

## **2. Meanings**

### **Discrimination**

The forms of **discrimination** that are unlawful under the school provisions are:

- Direct discrimination (including discrimination based on perception or association)
- Indirect discrimination
- Discrimination arising from disability
- Failure to make reasonable adjustments (for disabled people)
- Pregnancy and maternity discrimination

Protected characteristics for the school provisions in regard to harassment are:

- Disability
- Race
- Sex

It is not possible to justify direct discrimination, so it will always be unlawful, irrespective of the academy's motive or intention and regardless of whether the less favourable treatment is conscious or unconscious. In order for someone to show that he or she has been directly discriminated against, he or she must compare what has happened to him or her to the treatment that a person without his or her protected characteristic is receiving, or would receive. A 'hypothetical comparator' may be considered.

### **Objective Justification**

If there is evidence to show that the provision, criterion or practice is justifiable, i.e. it is a 'proportionate means of achieving a legitimate aim', also known as objective justification, then it will not amount to unlawful indirect discrimination.

Whilst the financial cost of using a less discriminatory approach cannot, by itself, provide a justification, cost can be taken into account as part of the academy's justification, if there are other good reasons for adopting the chosen practice.

### **Discrimination arising from disability**

Discrimination arises from disability when a disabled person is treated unfavourably because of something connected with his or her disability and such treatment cannot be . The motive for the treatment does not matter; the question is whether the disabled person has been treated unfavourably because of something arising from his or her disability.

### **Unfavourable Treatment**

Unfavourable treatment refers to any action or omission that places an individual or group at a disadvantage or causes them harm, detriment, or distress due to a protected characteristic as defined by the Equality Act 2010. This may include, but is not limited to, being denied opportunities, subjected to negative or unfair criticism, overlooked for advancement, or treated less favourably than others in comparable situations. Unfavourable treatment can be intentional or unintentional and may occur in any aspect of employment, education, or service provision. It undermines the principles of equality, diversity and inclusion and is not tolerated under this policy.

### **Harassment**

There are three different types of harassment that are unlawful under the Act:

- harassment related to a 'relevant protected characteristic'
- sexual harassment
- less favourable treatment because of a submission to, or a rejection of, sexual harassment and harassment related to sex.

Harassment occurs when a school, through its staff and/or agents, engages in unwanted behaviour that is related to a relevant protected characteristic and which has the purpose or effect of violating a pupil's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for the pupil.

The word unwanted means unwelcome or uninvited. It is not necessary for the person to say that he or she objects to the behaviour for it to be unwanted.

The harassment provisions of the Act do not protect pupils from harassment by other pupils. However, the provisions on discrimination mean that academies have an obligation to ensure that bullying by pupils that is related to a protected characteristic is treated with the same level of seriousness as any other form of bullying.

### **Sexual Harassment**

When considering sexual harassment in the context of pupils, it is likely to result in criminal proceedings and raise safeguarding issues which are beyond the scope of the Equality Act.

Sexual harassment occurs when an individual engages in unwanted behaviour of a sexual nature. This can include verbal, non-verbal or physical conduct, including unwelcome sexual advances, inappropriate touching, forms of sexual assault, sexual jokes, displaying pornographic photographs or drawings, or sending emails with material of a sexual nature.

### **Victimisation**

The Act protects people from being subjected to a detriment (which is, in effect, the same as a disadvantage) because they have carried out what is called a 'protected act', or because the

school believes that a person has carried out or is going to carry out a protected act. ss27, 27(1) 5.72

There are additional victimisation provisions for schools that extend the protection to pupils who are victimised because their parent or sibling has carried out a protected act. s86(2) 5.73

A 'protected act' is:

- Making a claim or complaint of discrimination (under the Act).
- Giving evidence or information in a claim under the Act.
- Making an allegation that the school or someone else has breached the Act.
- Doing anything else in connection with the Act.

### **Positive Action**

'Positive action' is the term used to describe action that the Act allows academies to take to counter the effects of past or present discrimination experienced by groups of pupils who share a protected characteristic, to meet the particular needs of pupils in such groups, or to facilitate their participation in activities in which participation by members of their group is disproportionately low.

It is necessary for academies, when considering positive action, to draw up an action plan that sets out:

- evidence of the disadvantage, particular needs and/or disproportionately low levels of participation, as appropriate, and an analysis of the causes;
- specific outcomes that the school is aiming to achieve;
- an identification of possible steps;
- an assessment of the proportionality of those possible steps.

## Appendix 2 Equality Action Plan Guidance

### Information

As detailed in this Policy, it is a statutory requirement for academies to:

- (a) publish information to demonstrate how they are complying with the Public Sector Equality Duty, and
- (b) prepare and publish equality objectives

When considering and reviewing your plan, as an academy, you should include evidence of the steps already set, steps being taken and progress made towards meeting the equality objectives.

The regulations are not prescriptive and it will be up to each academy to decide how, and in what format, the information is published, so long as it is accessible to those members of the school community and the public who want to see it.

When publishing information, it does not necessarily have to be statistical data. The EHRC suggest that many other kinds of information can be used to show how the school is promoting equality, such as publishing policies online, or publishing minutes of Governors' meetings.

The following are further examples, including examples suggested by The Key:

### Eliminating discrimination

- Staff and governors are regularly reminded of their responsibilities under the Equality Act, for example during meetings. Where this has been discussed during a meeting it is recorded in the meeting minutes.
- New staff receive training on the Equality Act as part of their induction, and all staff receive refresher training every two years
- The school has a designated member of staff for monitoring equality issues, and an equality link governor. They regularly liaise regarding any issues and make senior leaders and governors aware of these as appropriate.

### Advancing equality of opportunity

- Removing or minimising disadvantages suffered by people which are connected to a particular characteristic they have (e.g. pupils with disabilities, or gay pupils who are being subjected to homophobic bullying)
- Taking steps to meet the particular needs of people who have a particular characteristic (e.g. enabling Muslim pupils to pray at prescribed times)
- Encouraging people who have a particular characteristic to participate fully in any activities (e.g. encouraging all pupils to be involved in the full range of school societies)
- Assessing what a safe learning environment looks like for pupils with a protected characteristic
- Consider the impact of significant decisions on particular groups. For example, when a school trip or activity is being planned, the school considers whether the trip:
  - Cuts across any religious holidays
  - Is accessible to pupils with disabilities
  - Has equivalent facilities for boys and girls

### **Fostering good relations**

- Promoting tolerance, friendship and understanding of a range of religions and cultures through different aspects of our curriculum. This includes teaching in RE, citizenship and personal, social, health and economic (PSHE) education, but also activities in other curriculum areas. For example, as part of teaching and learning in English/reading, pupils will be introduced to literature from a range of cultures
- Holding assemblies dealing with relevant issues. Pupils will be encouraged to take a lead in such assemblies and we will also invite external speakers to contribute
- Working with our local community. This includes inviting leaders of local faith groups to speak at assemblies, and organising school trips and activities based around the local community
- Encouraging and implementing initiatives to deal with tensions between different groups of pupils within the school. For example, our school council has representatives from different year groups and is formed of pupils from a range of backgrounds. All pupils are encouraged to participate in the school's activities, such as sports clubs. We also work with parents to promote knowledge and understanding of different cultures
- We have developed links with people and groups who have specialist knowledge about particular characteristics, which helps inform and develop our approach

### **Equality Objectives**

Setting objectives may be very specific to your Academy following a review of data. However, the following are some examples of areas for consideration and objectives set by schools

#### **Staff Focus:**

- Introduce positive action to address areas of under representation
- Identify how recruitment and internal promotion can support and address under representation.
- Increasing the confidence levels of staff to recognise and challenge racial and other discrimination in resources and in remarks made in class or the school grounds.
- Consider the facilities and office environment to promote an inclusive workplace
- Have in place a reasonable adjustment agreement and PEEP for all staff who have declared a disability, to meet their needs better and ensure that any disadvantages they experience are addressed.
- Increase the representation of teachers from local black and minority ethnic communities over a 4-year period (from this July to July in 4 years' time), so that this group increases from 10% to 25% of the teaching workforce.

#### **Pupils Focus:**

- Publish attainment data each academic year showing how pupils with different characteristics are performing.
- Analyse the above data to determine strengths and areas for improvement, implement actions in response and publish this information.
- Make evidence available identifying improvements for specific groups (e.g. declines in incidents of homophobic or transphobic bullying).
- Publish further data about any issues associated with particular protected characteristics, identifying any issues which could affect our own pupils.

**Equality Analysis**

Consider a written equality analysis for policies, school trips and activities or where a strategic decision has been taken that could have a significant impact on a protected group. Refer to **Appendix 3** for further guidance.

## Template Equality Action Plan

Name of Academy:

Date:

Period:

This Action Plan forms part of the XXX Academy's Equality, Diversity and Inclusivity Policy.

Monitoring the impact of this policy will help highlight any differences between pupils/students and staff from different protected groups and decide if any further action will be necessary to meet particular needs and to improve the performance and attendance of pupils and welfare of staff from different groups in our commitment to the equality and diversity agenda, creating an inclusive environment.

Objective
Rationale for this objective
Actions required to achieve objective
How success of the objective will be measured
Timeframe outline

*Copy the table depending on the number of objectives set.*

**Progress against Objectives**

Objective 1:

Review Date:	Summary	Impact

Objective 2:

Review Date:	Summary	Impact

*Copy the table depending on the number of objectives set.*

Signed:

Date:

Headteacher:

## Appendix 3 Equality Analysis

### What does “equality analysis” mean?

Equality analysis is simply a process in which consideration is given to the implications that a policy or practice may have on a protected characteristic, so as to eliminate any negative impact that may create discrimination or disadvantage.

The process can also help to identify actions that advance equality more effectively and enable good practice to be shared. Equality analysis also helps us to establish whether our policies and practices have (or would) further the aims of the general equality duty. A protected characteristic can also be referred to as a protected group.

You may be better familiar with the term “Equality Impact Assessment” which has been a legal requirement on the grounds of disability, race and gender for a number of years. Equality Impact Assessment to Equality Analysis is a change in terminology, designed to emphasise the importance of the quality of analysis and how it is used in decision-making, rather than be seen as a process, or “tick-box” exercise.

### What is a Policy or Practice?

Policy or practice is used as an abbreviated term for what needs to be analysed. Policy or practice should be considered in the wider context, to incorporate not only the full range of policies and practices, but also activities and decisions (sometimes referred to as provision and criteria) for which the organisation is responsible. **In other words, “everything we do”.**

You may identify lots of practices that you carry out, but which cannot be assessed as there is no written procedure, as it is “just the way things are done around here”. In such cases you do still have a responsibility to stop and think about the effect of what you are doing on any particular protected group. This will mean that you have responsibility to ensure that you keep up to date with legislative and Trust policies and procedures/practice.

### Examples of policies and practices:

- Strategic Plan
- Curriculum strategy
- Disciplinary Policy
- Purchasing process
- Admissions criteria
- The decision whether or not to outsource catering provision

### When should I complete an equality analysis of my policy or practice?

Equality analysis should be carried out during the development or review of a policy or practice, rather than an exercise that is completed afterwards. By considering the impact from the outset, steps can be taken to ensure the policy or practice is fair for all. This will also save costs,

not just in terms of the time taken to change policies or practices, but in the cost of printing or purchasing materials, or equipment, if relevant to the policy or practice, and in the worst-case scenario avoiding a discrimination claim.

### **How are we going to implement this at the Trust?**

The owner of the Policy or practice should consider whether a written equality analysis should be completed

An equality analysis should be completed by an individual or group of people who are most familiar with the policy or practice. Individuals may form a working group to complete an analysis if the policy or practice applies more widely across the academy or Trust.

To support this, a three-step process has been produced.

### **Step 1 Screening Process**

There are 10 questions, aimed to assist you in considering whether a written equality analysis should be completed.

When considering a policy or practice you should consider its *relevance* to equality. Not all policies or practices will be relevant and, in such cases, you will state “**No**” to a ‘written equality analysis’. You may wish to state your justification as to why you did not think the policy or practice is relevant to equality in case of a challenge.

During the screening process you should also take a *proportionate* approach, which is taking an approach suitable to the importance of the policy or practice to equality.

If you feel a comprehensive equality analysis (written equality analysis) is required you should say ‘**Yes**’, and move to Step 2. It is not expected that you will complete it immediately, as it may take time to gather data and time to engage, as appropriate, with individuals and groups of a protected characteristic. You will be asked to give a rating score to the policy or practice which will help to determine its priority. Refer to the risk score table below.

To access the questions email [unicathr@chi.ac.uk](mailto:unicathr@chi.ac.uk)

### **Step 2 Assessment**

If you answered ‘**Yes**’ to a comprehensive equality analysis, consider the following questions to support the assessment.

The equality analysis will determine one of three outcomes:

1. No change to the policy or practice
2. Adjust the policy or practice
3. Stop and remove the policy or practice

### Step 3 Sign-off

Whilst individuals who complete a written equality analysis should be aware of equality and diversity issues, the knowledge may vary and so when a written analysis of a policy or practice has been completed it should be sent in the case of a practice, to the academy’s Senior Leadership team to consider, or in the case of a Policy, to either or both EDI focus groups to consider with the Chair/s and the Executive Committee reviewing.

***This will not delay the process in submitting your policy or practice to a Group or Committee, where appropriate, although you must indicate on the submitted policy or practice that it has been mapped and screened.***

The sign-off comprises six questions that require completion, as appropriate. The relevant main contact should then enter their name and date to confirm when the equality analysis was considered to have been completed.

Any feedback from the equality focus groups or Executive Committee will be given to the main contact listed against the policy or practice in question. Feedback may include a requirement for action.

### Appendix 4

#### Accessibility plan

Approved by:	[Name]	Date:	[Date]
Last reviewed on:	[Date]		
Next review due by:	[Date]		

Aim	Current good practice include established practice, and practice under development	Objectives state short, medium and long-term objectives	Actions to be taken	Responsible Person	Date to complete actions by	Success criteria
Increase access to the curriculum for pupils with a disability	<p>Explain your Academy's approach here. Examples:</p> <ul style="list-style-type: none"> <li>• Our Academy offers a differentiated curriculum for all pupils</li> <li>• We use resources tailored to the needs of pupils who require support to access the curriculum</li> <li>• Curriculum resources include examples of people with disabilities</li> <li>• Curriculum progress is tracked for all pupils, including those with a disability</li> <li>• Targets are set effectively and are appropriate for pupils with additional needs</li> <li>• The curriculum is reviewed to make sure it meets the needs of all pupils</li> </ul>					
Improve and maintain access to the physical environment	<p>Explain your academy's approach here. Example:</p> <p>The environment is adapted to the needs of pupils as required. This includes:</p> <ul style="list-style-type: none"> <li>• Ramps</li> <li>• Elevators</li> <li>• Corridor width</li> <li>• Disabled parking bays</li> <li>• Disabled toilets and changing facilities</li> <li>• Library shelves at wheelchair-accessible height</li> </ul>					

Aim	Current good practice include established practice, and practice under development	Objectives state short, medium and long-term objectives	Actions to be taken	Responsible Person	Date to complete actions by	Success criteria
<p>Improve the delivery of information to pupils with a disability</p>	<p>Explain your Academy's' approach here. Example: Our Academy uses a range of communication methods to make sure information is accessible. This includes:</p> <ul style="list-style-type: none"> <li>• Internal signage</li> <li>• Large print resources</li> <li>• Braille</li> <li>• Induction loops</li> <li>• Pictorial or symbolic representations</li> </ul>					

