Non-Discrimination and Inclusion Policy Including EYFS

Godstowe School

Document control

Field	Details
School	Godstowe School
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1. Purpose, status and scope

This policy explains how the school prevents unlawful discrimination, harassment and victimisation; identifies and removes barriers; makes reasonable adjustments; responds to prejudice and disadvantage; and monitors whether its arrangements operate fairly in practice. It applies to every school-controlled activity, including admissions, teaching, assessment, behaviour, boarding, trips, sport, clubs, transport, events, employment and services to parents or the public.

The proprietor is the responsible body for an independent school under the school provisions of the Equality Act 2010.
The legal duties differ according to whether the person is an applicant or pupil, employee, parent, visitor, contractor or service user. This policy identifies those differences rather than assuming one rule applies to every context.
Equality does not always mean identical treatment. Disabled people may require more favourable treatment or reasonable adjustments, and lawful positive action may address disadvantage, different needs or under-representation.

2. Legal and regulatory framework

Source	Application
Equality Act 2010, including Parts 3, 5 and 6 and Schedules 10 and 11	Non-discrimination, harassment, victimisation, reasonable adjustments, admissions and school exceptions; employment and services duties; accessibility planning.
For Women Scotland Ltd v The Scottish Ministers [2025] UKSC 16	For Equality Act purposes, sex, man and woman refer to biological sex; protection from gender reassignment discrimination remains.
EHRC Technical Guidance for Schools in England, current version last updated September 2025	Current detailed guidance on the Equality Act in school education, pending the outcome of the EHRC 2026 consultation.
EHRC Schools in England Technical Guidance consultation, June 2026	Draft future guidance and implementation horizon only. It is not final or a statutory code at the date of this policy.
Education (Independent School Standards) Regulations 2014, as amended	Curriculum, teaching, welfare, behaviour, premises, parent information and leadership standards, including respect for protected characteristics and accessibility-plan publication.
Independent School Standards Guidance, April 2026	Current DfE interpretation and evidence expectations for independent schools.
Keeping Children Safe in Education 2026	Safeguarding, discriminatory bullying, vulnerable children, children questioning gender, sex-based facilities, child-on-child abuse and information sharing from 1 September 2026.
Working Together to Safeguard Children 2026	Inclusive and anti-discriminatory organisational culture, challenge to racism and discrimination, and analysis of disproportionality.
Children and Families Act 2014 and SEND Code of Practice: 0 to 25 years	SEND and EHC plan framework, participation and coordinated support where applicable.
EYFS statutory framework for group and school-based providers, September 2026	Inclusive learning and development, equality, SEND, safeguarding and welfare requirements in registered EYFS provision.
Relationships Education, RSE and Health Education statutory guidance, September 2026	Age-appropriate teaching about respectful relationships, protected characteristics, discrimination, stereotypes and inclusion.
Restrictive interventions, including the use of reasonable force, in schools	Prevention, proportionality, individual needs, recording, parent notification and review of restraint, seclusion and force.
Human Rights Act 1998 and relevant Convention rights	Respect for private and family life, freedom of thought, conscience and religion, expression and non-discrimination, as applicable.
UK GDPR, Data Protection Act 2018 and Data (Use and Access) Act 2025	Lawful and proportionate handling of equality, disability, health, sex and safeguarding information.
DfE Workforce equalities requirements in schools and colleges: an outline, February 2026	Current overview of workplace equality law and practice for education employers.

3. Definitions

Term	Meaning in this policy
Applicant	A person for whom admission to the school is being considered.
Pupil	A person registered at the school. A child is anyone under 18 for safeguarding purposes.
Parent	A parent, carer, person with parental responsibility or person who has day-to-day care of the child, as appropriate.
Protected characteristic	A characteristic protected by the Equality Act. The characteristics applying to pupils under the schools provisions are disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
Disability	A physical or mental impairment with a substantial and long-term adverse effect on normal day-to-day activities, subject to statutory rules and deemed disabilities.
Gender reassignment	The protected characteristic applying where a person proposes to undergo, is undergoing or has undergone a process, or part of a process, to reassign sex by changing physiological or other attributes of sex. Medical treatment is not required.
Sex	For Equality Act purposes, biological sex, meaning the sex recorded at birth, following the Supreme Court judgment in For Women Scotland. A Gender Recognition Certificate does not change sex for Equality Act purposes.
Reasonable adjustment	A reasonable step to avoid a disabled person being placed at a substantial disadvantage, including changes to provisions, criteria or practices and the provision of auxiliary aids or services where required.
Positive action	Lawful, proportionate action to reduce disadvantage, meet different needs or increase participation by a group sharing a protected characteristic.
Indirect discrimination	Applying a provision, criterion or practice to everyone which puts people sharing a protected characteristic at a particular disadvantage and cannot be justified as a proportionate means of achieving a legitimate aim.
Victimisation	Subjecting a person to a detriment because they have done, may do or are believed to have done a protected act under the Equality Act.
Inclusion	The practical removal of barriers so that people can access, participate, belong, learn, work and progress safely and with dignity.

4. Core principles

- Every person will be treated with dignity, fairness and respect. Difference will not be treated as deficiency.
- The school will maintain high expectations while providing the adjustments and support needed for fair access and meaningful participation.
- Decisions will be based on relevant evidence and individual circumstances, not stereotypes, assumptions, pressure from others or a desire for administrative convenience.
- Safeguarding and equality duties will be considered together. Neither will be used as a slogan to avoid careful assessment of the other.
- The school will challenge prejudice, racism, misogyny, misandry, homophobia, biphobia, transphobia, ableism, religious hatred and other discriminatory conduct.
- Pupils will not be penalised because they or their parent raise a concern in good faith or request an adjustment.

5. Protected characteristics and the legal context

- For applicants and pupils under the schools provisions, the protected characteristics are disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
- Age and marriage or civil partnership do not apply as pupil protected characteristics under the schools provisions, although they may apply in employment or service contexts.
- Parents and members of the public are generally protected under the services provisions where the school provides them with a service. Employees and applicants for work are protected under the employment provisions.
- Where the Public Sector Equality Duty applies to the school or a particular function, leaders will meet it. The school will in any event use proportionate equality-impact review and data analysis as good governance.
- Lawful exceptions for single-sex schools, religious character, collective worship, curriculum content, boarding accommodation, competitive sport, charities and positive action will be used only where the exact statutory conditions are met.

6. Forms of unlawful conduct

Conduct	School response
Direct discrimination	Do not treat a person less favourably because of a protected characteristic, including by perception or association where the law provides.
Indirect discrimination	Review apparently neutral rules for group disadvantage and justify only where the rule is a proportionate means of achieving a legitimate aim.
Discrimination arising from disability	Do not treat a disabled person unfavourably because of something arising from disability unless objectively justified and the school did not know and could not reasonably have known of the disability.
Failure to make reasonable adjustments	Anticipate common barriers and respond promptly to individual need. The school will not charge a disabled pupil or parent for a required reasonable adjustment.
Harassment	Prevent and respond to unlawful unwanted conduct. The statutory harassment provisions have technical limits in school education, but harmful conduct will still be addressed under equality, safeguarding, behaviour and anti-bullying duties.
Victimisation	Protect pupils, parents, staff and witnesses from retaliation or disadvantage after an equality concern, complaint or protected act.
Instruction or inducement	No person may instruct, cause, induce or knowingly help another person to discriminate unlawfully.

7. Roles and responsibilities

- The proprietor will ensure compliance, approve this policy, receive assurance, challenge unexplained disparity and ensure leaders have sufficient authority and resources.
- The Headteacher will establish an inclusive culture, allocate responsibilities, ensure decisions are lawful and act on monitoring, complaints and incidents.
- The Inclusion Lead will coordinate implementation, advice, training, equality review and action tracking.
- The SENCO will coordinate SEND support and reasonable adjustments, while recognising that the Equality Act duty is owed by the responsible body and is not confined to the SENCO.
- The DSL will ensure discrimination, prejudice, bullying or exclusion is considered as a possible safeguarding indicator and that vulnerable pupils receive help or protection.
- Curriculum and pastoral leaders will review curriculum, options, grouping, assessment, resources, sanctions and participation for barriers and stereotypes.
- All staff must model respect, make agreed adjustments, report discriminatory conduct and seek advice rather than making assumptions.
- Pupils and parents are expected to treat others respectfully, provide relevant information and engage constructively with support and review arrangements.

8. Admissions and access to the school

- Admissions criteria, forms, assessments, interviews, taster days and decision-making will be accessible, published and applied consistently.
- The school will ask about disability, SEND, medical, communication and access needs so that reasonable adjustments and safe support can be considered, not to screen out applicants unlawfully.
- Reasonable adjustments will be considered for visits, assessments and interviews, including format, timing, communication, environment, assistance and auxiliary aids.
- Where the school concludes that it cannot meet need, it will identify the evidence, adjustments and support considered and the lawful reason for the decision.
- Single-sex, religious or selective admissions arrangements will be used only within the relevant statutory exception and the school's registered provision.
- The Admissions and Exclusions Policy contains the detailed decision and review route.

9. Curriculum, teaching, assessment and careers

- The curriculum will provide suitable breadth and progression and prepare pupils for life in a diverse British society without undermining fundamental British values.
- Teaching, grouping, options, examinations, careers, work experience and enrichment will not be restricted by stereotyped assumptions about ability, sex, race, disability, religion, family background or future pathways.
- Materials will reflect diverse people and experiences accurately and avoid tokenism, demeaning stereotypes or the erasure of lawful perspectives.
- Reasonable adjustments, access arrangements and auxiliary aids will be provided where required. Alternative activities will be educationally meaningful and not a routine substitute for inclusion.
- Achievement and participation will be reviewed by relevant pupil groups where lawful and proportionate, with action where patterns cannot be explained by legitimate factors.
- The Curriculum Policy, RSE Policy, and PSHE / PSHCE Policy set out detailed delivery expectations.

10. Benefits, facilities, services and school activities

- The equality duty applies across school life, including clubs, trips, meals, transport, prizes, leadership roles, sport, performances, libraries, IT, boarding and pastoral support.
- A pupil will not be excluded from an activity merely because adjustments require planning, additional communication, modified supervision or proportionate cost.
- Where full participation is not reasonably possible, the school will involve the pupil and parent in identifying the closest safe and meaningful alternative.
- External providers acting for the school will be selected, instructed and monitored so that the school does not outsource discrimination or failure to adjust.

11. Disability and reasonable adjustments

- The school will anticipate common barriers for disabled pupils and parents rather than waiting for every person to encounter them.
- The duty includes reasonable changes to provisions, criteria and practices and reasonable auxiliary aids or services.
- The school must not pass the cost of a required adjustment to the disabled pupil or parent.
- Reasonableness depends on effectiveness, practicability, cost, resources, disruption, health and safety, the person's views and other relevant circumstances. Cost alone does not decide the question.
- A risk assessment will support inclusion and identify controls. It will not be used to justify a blanket exclusion without evidence and individual consideration.
- Requests may be verbal or written and will not be rejected merely because a particular form was not used.
- The school will record the barrier, information considered, pupil and parent views, professional advice, options, decision, reasons, owner and review date.
- Adjustments may include timetable, teaching, seating, sensory environment, communication, uniform, attendance, behaviour response, transport, equipment, personal assistance, exam access and participation arrangements.
- Staff who need to know will receive clear instructions. Confidential information will be shared only as necessary for safe and effective support.

A request for a reasonable adjustment may be raised with any relevant member of staff and will be referred to the Inclusion Lead or SENCO as appropriate. Significant, disputed or resource-sensitive decisions will be escalated to the Headteacher. Where a pupil or

parent remains dissatisfied with the School's response, the matter may be raised through the Complaints Procedure or another applicable statutory route.

12. Accessibility planning and the physical environment

- The school will maintain and publish a current accessibility plan covering access to the curriculum, the physical environment and accessible information over a defined period.
- The plan will identify actions, timescales, resources, responsible persons and review arrangements, and will be informed by the needs of current and prospective disabled pupils.
- The schools reasonable-adjustment duty does not generally require alterations to physical features under Part 6, but the separate accessibility-planning duty requires planned improvement of physical access.
- Emergency evacuation, lockdown, alarms, signage, wayfinding, lighting, acoustics, toilets, changing and boarding access will consider disability and communication need.

13. SEND, EHC plans and medical needs

- SEND and disability overlap but are not identical. A pupil may be disabled without having SEN, or may have SEN without meeting the statutory disability definition.
- The school will not assume that an EHC plan or SEN support replaces the duty to make reasonable adjustments.
- Where an EHC plan applies, the school will cooperate with lawful consultation, implement provision for which it is responsible and raise any inability to deliver provision promptly with the responsible local authority and parent.
- Medical, mental-health and allergy needs will be supported through the relevant healthcare, first-aid and allergy policies and will not be treated as misconduct or lack of commitment.
- Attendance, reduced timetables, behaviour, exclusion and restrictive intervention decisions will consider whether disability, SEN, communication or unmet need is relevant.

14. English as an additional language and communication access

- Multilingualism is an asset. Limited English must not be confused with limited ability, low aspiration or SEN.
- The school will assess language proficiency and learning need separately and use interpreters, translations, visual support, assistive technology or other communication support where reasonably required.
- Important admissions, safeguarding, medical, complaints and contractual information will be made accessible where reasonable and necessary for informed participation.
- A pupil will not be disadvantaged in assessment merely because the assessment measures English proficiency rather than the knowledge or skill it is intended to assess, subject to the rules of the awarding body or statutory assessment.

15. Looked-after, previously looked-after and other vulnerable pupils

- The school will avoid deficit assumptions about children in care, previously in care, in kinship care, young carers, service children, refugees, children with social workers and children affected by poverty, housing insecurity or family adversity.
- Support will be discreet, ambitious and coordinated, with strong induction, trusted relationships, participation in wider school life and careful transition planning.
- The DSL will consider whether discrimination, racism, disability, care experience or past involvement with services is affecting trust, disclosure, attendance or engagement.
- Where a Personal Education Plan or other statutory plan applies, the school will contribute appropriately and monitor impact.

16. Race, ethnicity, culture and hair discrimination

- Working Together to Safeguard Children 2026 strengthens expectations that leaders create inclusive, anti-discriminatory cultures and that practitioners challenge racism and discrimination.
- Racist incidents, microaggressions, stereotypes and unequal expectations will not be dismissed as banter or cultural misunderstanding.
- Uniform, appearance and behaviour policies will be reviewed for indirect race discrimination.
- The school will examine disproportionality in sanctions, exclusions, attainment, sets, leadership opportunities, referrals and complaints and will act where differences are not credibly explained.
- The curriculum will include accurate representation of different ethnic, national and cultural experiences without presenting any group as monolithic.
- Racist incidents will be recorded, investigated, supported and followed up under the Anti-Bullying, Behaviour and Safeguarding policies.

17. Religion or belief, collective worship, dress and uniform

- The school will respect genuine religion or belief and non-belief, while maintaining safeguarding, education and lawful school requirements.
- Uniform and appearance rules will allow reasonable flexibility for religious dress, jewellery, hair, dietary observance and modesty unless a restriction is justified, proportionate and clearly explained.
- Requests relating to religious observance, fasting, prayer, absence or participation will be considered individually, taking account of the pupil's welfare, education, age and the school's lawful ethos or religious character.
- Curriculum content and collective worship have specific statutory exceptions, but teaching and delivery must not subject pupils to unlawful discriminatory treatment.
- Protected beliefs do not give a right to harass, threaten or discriminate against another person. Equally, disagreement expressed lawfully and respectfully will not automatically be treated as bullying.

18. Sex, pregnancy and maternity, sexual orientation and gender reassignment

- The Supreme Court held in April 2025 that sex, man and woman in the Equality Act 2010 refer to biological sex. A Gender Recognition Certificate does not change sex for Equality Act purposes.
- This interpretation does not remove protection for trans people. Gender reassignment remains a protected characteristic, and discrimination may also arise through perception, association or sex discrimination principles.
- School decisions must protect the rights, safety, privacy and dignity of all affected pupils and must not rely on hostility, stereotypes or blanket assumptions.
- Girls and boys will have equal access to curriculum, options, leadership, careers, enrichment and recognition, subject only to lawful and proportionate arrangements.
- A pregnant pupil or pupil who is a parent will not be excluded from education, treated unfavourably or denied support because of pregnancy or maternity. Safeguarding, health, attendance and reintegration support will be coordinated.
- Lesbian, gay and bisexual pupils, and pupils perceived to be lesbian, gay or bisexual, will be protected from discriminatory bullying and supported without assumptions about identity or family circumstances.
- Pupils with the protected characteristic of gender reassignment will be protected from discrimination and prejudice. Records and disclosures will be handled sensitively and lawfully.

19. Children who are questioning their gender

- The school will not initiate social transition. Staff will not make informal changes relating to social transition unless the school has completed its decision process and parents or carers have been involved in accordance with KCSIE 2026.
- The school will take time to understand the child's thoughts, feelings, wider experiences, mental health, neurodiversity, relationships, bullying and safeguarding context.
- The first question is what is in the best interests of the child and other children. The outcome may not be identical to the child's request.
- Parents or carers will be engaged as a matter of priority and, in the vast majority of cases, the School will work with them to determine what is in the best interests of the child. Their views will be treated with importance and considered alongside the child's views, any available clinical evidence or advice and other relevant professional input. In the rare circumstances where involving parents or carers would create a greater risk to the child than not involving them, the DSL will determine what safeguarding action is required before parents or carers are contacted or any decision is taken.
- Social transition is treated as an active intervention. The school will take a very careful, evidence-informed approach, with particular caution for primary-aged and pre-pubertal children.
- Every decision, information source, consultation, safeguarding assessment, agreed support and review date will be documented.
- If a child discusses feelings but asks for no school change, staff will respect appropriate confidentiality unless there is a related safeguarding or welfare concern.
- Support may include a trusted adult, anti-bullying action, pastoral or mental-health support, SEND assessment, flexible non-stereotyped uniform options and sensitive communication.
- The School will be conscious of the rights of pupils and staff in relation to religion or belief when considering language associated with social transition. It will seek respectful and practical solutions that protect pupils from bullying or harassment while respecting applicable rights, which may include using a person's name rather than pronouns.

Requests for School support relating to social transition will be referred to the Headteacher. The Headteacher will coordinate a documented decision-making process involving the DSL and, where relevant, the SENCO or Inclusion Lead, the child, parents or carers and any available clinical or other professional advice. No member of staff will make an informal change relating to social

transition before the School's decision-making process has been completed. The decision, reasons, information considered, agreed support and review arrangements will be recorded.

Any agreed support relating to social transition will be reviewed at appropriate points and whenever the child's circumstances, needs or safeguarding context materially change. The DSL will be involved promptly where a review raises a safeguarding issue.

Where a child wishes to reverse or change arrangements previously agreed in relation to social transition, the School will respond flexibly and sensitively and will work with the child, parents or carers and relevant professional advisers as appropriate.

20. Single-sex admissions, facilities, accommodation and sport

- Schools must not allow children into toilets designated for the opposite biological sex. Separate toilets are required for boys and girls aged 8 and over, except for individual lockable toilets intended for one pupil at a time.
- A pupil aged 11 or over at the start of the school year must not undress in front of a pupil of the opposite biological sex, and must not use changing rooms designated for the opposite sex.
- Children must not share overnight accommodation with children of the opposite biological sex. Alternative private arrangements should be considered where needed and must protect everyone's safety, comfort, privacy and dignity.
- Where a sport or activity must be organised in single-sex groups from a particular age for safety reasons, there will be no exception to the sex-based grouping. Where safety is not the determining factor, any request relating to participation will be considered individually in accordance with KCSIE 2026, the Equality Act 2010 and the School's documented decision-making process for social-transition requests, taking account of the best interests of the child, the impact on other pupils and the need for safe and fair participation.
- A gender-questioning pupil who does not wish to use facilities for their sex should be offered a suitable individual alternative where possible, without removing or compromising lawful single-sex provision.
- Single-sex admissions will operate only where the school is lawfully registered and entitled to use that exception.
- Facilities, rooming and sport decisions will be recorded, communicated only to those who need to know and reviewed regularly.

21. Behaviour, discipline, attendance, suspension and exclusion

- Behaviour may arise from disability, SEND, trauma, communication, discrimination, bullying, medical need or unmet support. Staff will consider this without assuming that every incident is caused by a protected characteristic.
- Automatic sanctions and zero-tolerance language will not replace individual consideration, reasonable adjustments, safeguarding and proportionality.
- Attendance rewards, punctuality rules and absence interventions will be reviewed so that disability, pregnancy, medical treatment, religious observance or caring responsibilities do not create unlawful disadvantage.
- Suspension, permanent exclusion and required removal decisions will record equality considerations, adjustments, support, comparators and reasons.
- The school will monitor sanctions, internal removals, restrictive interventions and exclusions for disproportionality and repeated patterns.

22. Bullying, harassment, hate incidents and child-on-child abuse

- Prejudice-based and discriminatory bullying will be addressed with the same seriousness as other bullying, and the protected characteristic or perceived characteristic will inform risk, support and prevention.
- The school will distinguish ordinary conflict from bullying, harassment, hate incidents and safeguarding harm while responding to each appropriately.
- Sexual harassment, misogynistic or misandrist abuse, racist abuse, disability-related abuse, homophobic, biphobic or transphobic abuse and religious hatred may also be child-on-child abuse and require DSL involvement.
- Affected pupils will be heard, supported and protected from retaliation. The response will not depend on the pupil proving that the conduct was intended to cause harm.
- Records will identify motive or perceived motive, protected characteristic, action, support, outcome and recurrence so leaders can identify patterns.

23. Restrictive interventions and physical contact

- Restrictive intervention will be lawful, necessary, proportionate and the least restrictive option for the least time.
- Staff will consider disability, SEND, communication, trauma, sensory need, sex, culture, religion, medical needs and relevant plans before, during and after intervention.
- Force will never be used as punishment or because a pupil communicates distress in an unfamiliar way.
- Records will include relevant individual characteristics and adjustments, and leaders will review patterns and disproportionality.

- Detailed procedures, records and parent notification are contained in the Restrictive Interventions and Behaviour policies.

24. Staff employment and workplace equality

- Recruitment, pay, training, promotion, work allocation, performance management, discipline, grievance, flexible working and termination will comply with the employment provisions of the Equality Act.
- All nine protected characteristics may be relevant in employment, with statutory distinctions including marriage and civil partnership and age.
- Reasonable adjustments will be considered for disabled job applicants and employees at every stage, including recruitment, workplace access, duties, hours, equipment, communication and return to work.
- Occupational requirements, single-sex exceptions and positive action will be used only where legal conditions are met and advice is obtained where necessary.
- Pregnancy, maternity, menopause, religion or belief and gender reassignment matters will be handled sensitively, consistently and without stereotyping.
- The Safer Recruitment Policy, Staff Code of Conduct and HR procedures contain the detailed employment process.

25. Parents, visitors, contractors, lettings and external providers

- Parents and visitors will have accessible routes to information, meetings, complaints and school events, including reasonable adjustments for disability and communication need.
- The school will not disadvantage a pupil because of a parent's protected characteristic, complaint, disability, language or family structure.
- Contractors, agents, clubs, transport providers, caterers and visiting speakers acting for the school will receive clear equality and safeguarding expectations.
- Where an independent provider operates on school premises in its own right, the contract will identify its legal responsibility and require appropriate equality, safeguarding and complaints arrangements.
- Lettings will not be approved where the proposed activity is unlawful or would expose pupils or the school community to discriminatory harassment or safeguarding risk.

26. Positive action and targeted support

- The school may take proportionate positive action where it reasonably thinks people sharing a protected characteristic experience disadvantage, have different needs or participate disproportionately less.
- Positive action will be evidence-based, directed at a legitimate need and reviewed for effectiveness and unintended impact.
- Examples may include mentoring, targeted outreach, accessible clubs, support groups, curriculum action, family engagement or encouragement to enter under-represented subjects or activities.
- Positive action is not the same as positive discrimination. Preferential treatment outside the statutory conditions will not be used.
- Disabled pupils may lawfully be treated more favourably than non-disabled pupils.

27. Curriculum resources, external speakers and political impartiality

- Teaching about equality, protected characteristics, relationships, faith, sex, gender, race, disability and contested issues will be accurate, age-appropriate, respectful and consistent with statutory guidance.
- Staff will not present stereotypes as fact, encourage hostility towards protected groups or imply that pupils must adopt a particular political or personal belief.
- The School will preclude the promotion of partisan political views in the teaching of any subject. Where political issues are brought to pupils' attention while attending the School, during extra-curricular activities provided or organised by or on behalf of the School, or through the promotion at School of extra-curricular activities, the School will take such steps as are reasonably practicable to ensure that pupils receive a balanced presentation of opposing views.
- External speakers and resources will undergo proportionate due diligence for expertise, safeguarding, impartiality, accuracy and suitability.
- Pupils may question and debate ideas respectfully. The school will distinguish lawful disagreement from discriminatory abuse.

28. Raising concerns, complaints, safeguarding and external remedies

- A pupil, parent or staff member may raise an equality concern with the Inclusion Lead, Headteacher or another appropriate senior member of staff, verbally or in writing. Immediate support or a reasonable adjustment will not wait for a formal complaint where action is reasonably required.

- Safeguarding concerns will be referred immediately to the DSL and will not wait for the complaints process.
- Complaints about admissions, exclusion, disability discrimination, employment or data protection may have distinct legal routes and time limits. The school will signpost the correct route without giving legal advice beyond its competence.
- The Complaints Procedure will protect confidentiality, fairness and non-victimisation and will record action whether or not the complaint is upheld.
- Nothing prevents a person from seeking independent advice or using an available court, tribunal, regulator or inspectorate route.

29. Information, confidentiality, monitoring and privacy

- Equality monitoring data will be collected only where there is a clear purpose, lawful basis and suitable privacy information.
- The school will distinguish sex data, gender reassignment information, health information, religion, race and other categories and will not infer sensitive information unnecessarily.
- A pupil's biological sex will be recorded accurately wherever KCSIE 2026 and legal requirements require it. Any preferred name or other pastoral information will be recorded separately and shared only where necessary.
- Monitoring will use suitably sized and anonymised groups where possible. Small-number data will not be published or shared in a way that identifies individuals.
- Records of adjustments, complaints, incidents and social-transition decisions will be secure, accurate, access-controlled and retained under the records schedule.

Where lawful, relevant and proportionate, monitoring may include admissions and withdrawals, attainment and progress, attendance, behaviour and exclusions, bullying and safeguarding incidents, participation and leadership opportunities, complaints and reasonable adjustments, and workforce information. The School will use this information to identify unexplained disparity and determine whether action is required.

30. Training, communication and pupil voice

- All staff will receive induction and regular updates on equality duties, reasonable adjustments, discriminatory bullying, safeguarding, inclusive communication and the school's decision routes.
- Staff with specialist responsibilities will receive role-specific training, including admissions, HR, SEND, safeguarding, behaviour, complaints, premises and boarding.
- Pupils will be taught how to recognise discrimination, challenge prejudice safely, report concerns and support respectful relationships.
- Pupil, parent and staff voice will be used to identify barriers that records alone may not reveal. Participation will be accessible and will not require disclosure of private information.
- Key procedures and contacts will be available in accessible formats and explained in age-appropriate language.

31. Monitoring, review and proprietor oversight

- The Headteacher will review equality data, incidents, reasonable adjustments, complaints and participation at planned intervals and following significant incidents or identified patterns.
- The proprietor will receive proportionate assurance on legal compliance, key disparities, serious cases, overdue adjustments, accessibility-plan progress and completed actions.
- Leaders will test whether differences are caused by legitimate factors, data quality, policy design, inconsistent practice, bias, unmet need or wider disadvantage.
- Actions will have an owner, deadline, success measure and review. Repeated findings will trigger policy, training, supervision or resource change.
- This policy will be reviewed at least annually and sooner after legal change, final EHRC guidance, a serious incident, inspection finding, pattern of disparity or material change in provision.

32. Policies to be read in conjunction

- Safeguarding and Child Protection Policy
- Admissions and Exclusions Policy
- Anti-Bullying Policy
- Attendance and Punctuality Policy
- Behaviour and Discipline Policy
- Staff Code of Conduct
- Complaints Procedure

- Curriculum Policy
- Relationships and Sex Education Policy
- PSHCE Policy
- SEND Policy and Accessibility Plan
- Supporting Pupils with Medical Conditions Policy
- First Aid Policy and Whole-School Allergy Safety Policy
- Risk Assessment Policy
- Restrictive Interventions Policy
- Internet Policy and Acceptable Use Agreements
- Safer Recruitment Policy
- Data Protection Policy, Data Protection Privacy Notice and Records Retention Schedule
- Educational Visits and Transport procedures
- Boarding policies and procedures, where applicable
- HR equality, grievance, disciplinary and flexible-working procedures

33. Source register

Source	Application
Equality Act 2010	Core schools, services and employment equality duties, reasonable adjustments, positive action and statutory exceptions.
For Women Scotland Ltd v The Scottish Ministers [2025] UKSC 16	Authoritative interpretation of sex, man and woman under the Equality Act; continued gender-reassignment protection.
EHRC Technical Guidance for Schools in England, current version	Detailed current guidance for school education, last updated September 2025.
EHRC draft Schools in England Technical Guidance consultation, June 2026	Emerging guidance only; not final or a statutory code at the policy date.
Education (Independent School Standards) Regulations 2014 and April 2026 guidance	Independent-school curriculum, welfare, premises, information, accessibility and leadership standards.
Keeping Children Safe in Education 2026	Discriminatory bullying, vulnerable children, children questioning gender, sex-based premises and safeguarding arrangements.
Working Together to Safeguard Children 2026	Inclusive and anti-discriminatory culture, anti-racist practice and disproportionality analysis.
Children and Families Act 2014 and SEND Code of Practice	SEND, EHC plans, participation, support and interaction with disability duties.
EYFS statutory framework, September 2026	Inclusive early-years learning, SEND, equality and safeguarding.
RSE and Health Education statutory guidance, September 2026	Relationships Education and RSE requirements, including respectful relationships, protected characteristics, stereotypes and inclusion. The separate statutory Health Education requirement does not apply to independent schools.
Restrictive interventions guidance, April 2026	Equality, individual need, recording and review in force and restraint.
Human Rights Act 1998	Relevant rights and proportionality in sensitive decisions.
UK GDPR, Data Protection Act 2018 and Data (Use and Access) Act 2025	Handling equality, health, sex, adjustment and safeguarding information.
DfE Workforce equalities requirements in schools and colleges, February 2026	Current workplace equality overview.
Independent-school inspection toolkit and operating guide for use from September 2026	Inspection evidence on inclusion, equal access, safeguarding, leadership and implementation.
Boarding schools national minimum standards, May 2026	Equal access, welfare, accommodation, privacy and complaints where boarding is provided.