

Equal Opportunities Policy for Pupils

We promote an environment in which diversity is recognised, valued and encouraged. We acknowledge the multicultural and diverse nature of our pupil community and society in general. We are committed to principles of fairness and mutual respect where everyone accepts the concept of individual responsibility. It is therefore all our responsibility to make sure pupils observe and adhere to this policy at all times. We view any breach seriously in line with our behaviour and anti bullying policies.

We recognise that discrimination in a school in any form is unacceptable and in most cases unlawful. Our policy seeks to ensure pupils are treated fairly and without favour or prejudice. We are committed to applying this throughout all areas of the school.

Our policy complies with current legislation. We review it regularly and will update it if the law changes. However, we recognise that equality of opportunity is best achieved by day to day commitment throughout the Foundation community. We offer support and training where necessary to achieve and maintain this.

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1 Objectives

1.1 This is the equal opportunities policy of The Stephen Perse Foundation (the **Foundation**).

1.2 The objectives of this policy are as follows:

1.2.1 to promote equal treatment within the Foundation for all members of the Foundation community;

1.2.2 to welcome, understand and value diversity in our community

1.2.3 to communicate the commitment of the Foundation to the promotion of equal opportunities;

1.2.4 to create and maintain an open and supportive environment which is free from discrimination, harassment and victimisation;

1.2.5 to foster mutual tolerance and positive behaviours, practices and attitudes so that everyone can feel valued within the Foundation.

2 Scope and application

2.1 This policy applies to all the schools and nurseries of Foundation including the Early Years Foundation Stage (**EYFS**) and boarding.

3 Regulatory framework

3.1 This policy has been prepared to meet the Foundation's responsibilities under:

3.1.1 Equality Act 2010;

3.1.2 Education (Independent School Standards) Regulations 2014;

3.1.3 National Minimum Standards for boarding schools (Department for Education (**DfE**), 2022);

3.1.4 *Statutory framework for the Early Years Foundation Stage* (DfE, March 2021);

3.1.5 Education and Skills Act 2008;

3.1.6 Childcare Act 2006;

3.1.7 Data Protection Act 2018 and UK General Data Protection Regulation (UK GDPR); and

3.1.8 Children and Families Act 2014.

3.2 This policy has regard to the following guidance and advice:

3.2.1 [Equality Act 2010: explanatory notes \(2010\)](#);

3.2.2 [Special educational needs and disability code of practice: 0 to 25 years \(DfE, May 2015\)](#);

3.2.3 [Technical guidance for schools in England \(Equality and Human Rights Commission, September 2023\)](#);

3.2.4 [The Equality Act 2010 and schools: departmental advice for school leaders, school staff, governing bodies and local authorities \(DfE, updated June 2018\)](#);

3.2.5 [Gender separation in mixed schools \(DfE, June 2018\)](#);

- 3.2.6 [Working together to safeguard children \(HM Government, July 2018 as amended in December 2020\)](#);
- 3.2.7 [Keeping children safe in education \(DfE 2023\)](#); and
- 3.2.8 [Relationships education, relationships and sex education \(RSE\) and health education guidance \(DfE, updated September 2021\)](#).

3.3 The following Foundation policies, procedures, documents and resource material are relevant to this policy:

- 3.3.1 Admissions policy;
- 3.3.2 English as an Additional Language policy;
- 3.3.3 Behaviour, Rewards and Sanctions policy;
- 3.3.4 Individual School Rules, Boarding Rules and Codes of Conduct;
- 3.3.5 Anti-bullying policy;
- 3.3.6 Disability policy;
- 3.3.7 Three Year Accessibility Plan;
- 3.3.8 Special Educational Needs and Learning Difficulties policy;
- 3.3.9 Relationships and Sex Education policy;
- 3.3.10 Risk Assessment Policy for Student Welfare;
- 3.3.11 Transgender Guidance; and
- 3.3.12 the terms and conditions of the contract for educational services made between the Foundation and the parents.

4 Responsibility statement and allocation of tasks

4.1 The Proprietor has overall responsibility for all matters which are the subject of this policy.

4.2 To ensure that efficient discharge of its responsibilities under this policy, the Board of Governors has allocated the following tasks:

Task	Allocated to	When / frequency of review
Ensure implementation and adherence to policy and procedures related to this policy	All staff and pupils	At all times
Review policy and practice and act as a critical friend in relation to equal opportunities at the Foundation	Equity Diversity and Inclusion (EDI) Committee	As required, and at least annually
Keeping the policy up to date and compliant with the law and best practice	Compliance Team	As required, and at least annually

Monitoring the implementation of the policy (ensuring its accessibility and availability), relevant risk assessments and any action taken in response and evaluating effectiveness	Heads of School for their own school	As required, and at least termly
Maintaining up to date records of all information created in relation to the policy and its implementation as required by the UK GDPR	Heads of School	As required, and at least termly
Seeking input from interested groups (such as students, staff and parents) to consider improvements to the Foundation's processes under the policy	Principal	As required, and at least annually
Formal annual review	Policy owner	Annually

5 Publication and availability

- 5.1 This policy is published on the Foundation website.
- 5.2 This policy is available in hard copy on request from the school and nursery offices.
- 5.3 A copy of the policy is available for inspection from the relevant school or nursery office during the school day.
- 5.4 This policy can be made available in large print or other accessible format if required.

6 Definitions

- 6.1 Where the following words or phrases are used in this policy:
 - 6.1.1 reference to **EHC Plan(s)** is to Education and Health Care Plan(s);
 - 6.1.2 references to **Protected Characteristics** are as defined in Chapter 1 of the Equality Act 2010;
 - 6.1.3 reference to **PSHEE** is the personal, social, health and economic education programme;
 - 6.1.4 references to the **Foundation community** includes staff, supply staff, governors, students, parents, carers, visitors and volunteers.

7 Policy statement

- 7.1 The Foundation recognises the benefits of having a diverse Foundation community, with individuals who value one another, and the different contributions everyone can make. Students will be taught to value and respect others and other cultures. The Foundation is committed to being an equal opportunities education provider and is committed to equality of opportunity for all members of the Foundation community.

- 7.2** In the provision of equal opportunities, the Foundation recognises and accepts its responsibilities under law to oppose discrimination on the basis of the following Protected Characteristics:
- 7.2.1 disability;
 - 7.2.2 gender reassignment;
 - 7.2.3 pregnancy and maternity;
 - 7.2.4 race;
 - 7.2.5 religion or belief (including lack of religion or belief);
 - 7.2.6 sex;
 - 7.2.7 sexual orientation;
 - and (in the case of adult members of the Foundation community)
 - 7.2.8 marital and civil partnership; and
 - 7.2.9 age.
- 7.3** The Foundation also opposes all bullying and unlawful discrimination on the basis that a person has a special educational need or learning difficulty, or because English is an additional language.
- 7.4** The Foundation aims to ensure that all policies and practices conform with the principle of equal opportunities. The Foundation will tackle inappropriate attitudes, behaviours and practices through staff leading by example, through the PSHEE, Relationships and Sex Education policy and programmes, through the supportive Foundation culture and through the Foundation's wider policies.

8 Discrimination

- 8.1** Discrimination may be direct or indirect, or arising from disability and it may occur intentionally or unintentionally. This policy covers the following forms of discrimination:
- 8.1.1 **Direct discrimination:** direct discrimination occurs when a person is treated less favourably than another person because of a Protected Characteristic. For example, rejecting an applicant of one race because it is considered they would not "fit in". This would be a decision based on grounds of their race and would be direct discrimination. Direct discrimination also occurs when a person is treated less favourably because of their association with another person who has a protected characteristic (other than pregnancy or maternity). For example, if a student is harassed or victimised because a sibling is disabled, this would be direct discrimination against that student.
 - 8.1.2 **Indirect discrimination:** indirect discrimination occurs where an individual is subject to an unjustified provision, criterion or practice which puts them at a particular disadvantage because of, for example, their sex or race. For example, a minimum height requirement would be likely to eliminate proportionately more women than men. If these criteria cannot be objectively justified for a reason unconnected with sex, they would be indirectly discriminatory on the grounds of sex.
 - 8.1.3 **Discrimination arising from disability:** discrimination arising from disability occurs when a disabled person is treated unfavourably because of something connected

with their disability and the treatment cannot be shown to be a proportionate means of achieving a legitimate aim. For example, where a student with cerebral palsy who is a wheelchair user is told they will be unable to attend a school trip because there is no wheelchair access available and other options are not investigated.

9 Harassment

9.1 This policy covers the following forms of harassment:

9.1.1 Harassment related to a Protected Characteristic: Harassment may occur where someone engages in unwanted conduct related to a Protected Characteristic that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading or offensive environment for that person. This covers unpleasant and bullying behaviour, but potentially extends also to actions which, whether intentionally or unintentionally, cause offence to a person because of a Protected Characteristic.

9.1.2 Sexual harassment: Harassment may also occur where a person engages in unwanted conduct of a sexual nature and that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading or offensive environment for that person. It is also harassment to treat someone less favourably because they have either rejected, or submitted to, sexual harassment.

9.2 The Foundation will not tolerate harassment for any reason. Further information relating to the following types of harassment can be found in the relevant school policies below:

9.2.1 Harassment relating to a protected characteristic by a student is likely to be contrary to the Foundation's Anti-Bullying Policy and Behaviour, Rewards and Sanctions Policy.

9.2.2 Sexual harassment relating to students and the Foundation's response will be dealt with in accordance with the Safeguarding and Child Protection Policy.

10 Victimisation

10.1 Victimisation may occur where a person is treated less favourably than otherwise may be the case, because of some action (referred to as a 'protected act') that they have taken, they may take or they are believed to have taken in connection with the Equality Act 2010. Protected acts are, broadly, any actions taken by a person in good faith in connection with the Equality Act, such as making or supporting an allegation of discrimination or harassment.

10.2 It is also unlawful to victimise a child for anything done in relation to the Equality Act by their parent or sibling.

10.3 It is important that no one is afraid to raise genuine concerns about discrimination because of fear of retaliation. Further information may be found in the Foundation's Anti-Bullying Policy and Behaviour, Rewards and Sanctions Policy.

11 Admission

11.1 Applicants: the Foundation accepts applications from, and admits students irrespective of their sex, gender reassignment, race, disability, sexual orientation, pregnancy and maternity or religion or belief or special educational needs (**SEND**) and will not discriminate on these grounds in the terms on which a place is offered. The Foundation will treat every application in a fair, open-minded way.

11.2 Selection: every application will be considered on its merits within the Foundation's criteria for selection on grounds of the student's ability and aptitude, but this will not be done as a way of excluding students with a disability or special educational needs, subject to section 12 below.

11.3 Admissions policy: the Foundation's Admissions Policy reflects the Foundation's approach towards equal opportunities for prospective students and is consistent with this policy.

12 Education and associated services

12.1 Equal access: the Foundation will afford all students equal access to all benefits, services, facilities, classes and subjects including all sports, irrespective of their sex, gender reassignment, race, disability, sexual orientation, pregnancy and maternity or religion or belief or special educational needs, subject to overriding considerations of safety and welfare. For those year groups where the diamond model is already in place, although opportunities of the same range and quality will be available, they may not be identical or occurring at the same time.

12.2 Positive action: the Foundation may afford students of a particular racial group, or students with a disability or special educational needs, access to additional education or training to meet the special needs of the students in that group, for example, special language training for groups whose first language is not English.

12.3 Exclusions: the Foundation will not discriminate against any student by excluding them from the Foundation, or by subjecting them to any other detriment, on the grounds of their sex, gender reassignment, race, disability, sexual orientation, pregnancy and maternity or religion or belief, or special educational needs.

12.4 Teaching and Foundation materials: efforts are made to recognise and be aware of the possibility of bias (for example, on the grounds of sex or race), so that this can be eliminated in both the Foundation's teaching and learning materials and teaching styles. Materials are carefully selected for all areas of the curriculum so as to avoid stereotypes and bias. This is also shown in our curriculum where teaching content reflects diversity and equity.

12.5 Student interaction: all students are encouraged to work and play freely with, and have respect for, all other students, irrespective of their sex, gender reassignment, race, disability, sexual orientation, religion or belief or pregnancy and maternity or special educational needs, subject to considerations of safety and welfare. Positive attitudes are fostered towards all groups in society through the curriculum and ethos of the Foundation, and students will be encouraged to question assumptions, stereotypes and negative behaviours and practices. The Foundation's PSHEE and Relationships and Sex Education curriculum encourages respect for other people, with particular regard to the Protected Characteristics.

12.6 Bullying: the Foundation will not tolerate bullying (including cyberbullying and prejudice-based bullying) for any reason. Specific types of bullying include:

12.6.1 bullying relating to race, religion, belief or culture;

12.6.2 bullying related to SEND, learning difficulties or disabilities;

12.6.3 bullying related to appearance or health conditions;

12.6.4 bullying relating to sexual orientation;

12.6.5 bullying related to misogyny;

12.6.6 bullying of young carers or looked after children or otherwise related to home circumstances;

12.6.7 sexist or sexual bullying or bullying related to gender reassignment.

See the Foundation's Anti-bullying Policy.

13 School uniform

13.1 The Foundation's school uniform rules are consistent with this policy: in each school, the same school uniform rules apply equally to all students, irrespective of their sex, gender reassignment, race, disability, sexual orientation, pregnancy and maternity or religion or belief or special educational needs, subject to considerations of safety and welfare. However, the Foundation will consider reasonable requests to alter the school uniform, for example, for genuine religious requirements and reasonable adjustments for disabled children.

13.2 Symbols of faith: School uniform should be worn on all school occasions unless special permission has been given to the contrary. Students may not wear jewellery with school uniform, except for a watch, one plain, simple stud or 1 cm hoop in each ear, and a simple chain and cross, or other equivalent religious emblem. If a student feels that it is essential for them to wear a particular piece of jewellery, for religious or cultural reasons this should be agreed with the Head of School in advance of doing so.

13.3 Disabled students: reasonable adjustments may be required to the Foundation uniform for disabled students who require them. Where possible, we will modify our teaching and learning to reflect individual pupils' needs. The student or their parents should refer the matter to the relevant Head of School to ensure all reasonable adjustments are made to accommodate the student.

14 Religious belief

14.1 Religion: the Foundation respects the right and freedom of individuals to worship in accordance with any faith, or no faith, subject always to their respecting the rights and freedoms of the Foundation community as a whole and considerations of safety and welfare.

15 Disability and special educational needs

15.1 Our approach: we are an inclusive school which welcomes members of the Foundation community with disabilities and special educational needs. We maintain and drive a positive culture towards inclusion of disabled people and those with special educational needs in all the activities of the Foundation and we will not treat a member of the Foundation community less favourably on these grounds without justification. At present, our facilities, physical and otherwise, for the disabled and those with special educational needs are limited. However, we will do all that is reasonable to ensure that the Foundation's curriculum, ethos, culture, policies, procedures and premises are made accessible to everyone. Our Disability Policy and policy on special educational needs are consistent with this policy. For a copy of these policies, please contact the relevant School Office.

15.2 Reasonable adjustments: the Foundation has an on-going duty to make reasonable adjustments for disabled students including students with special educational needs where this falls within the definition of "disability" in respect of the education and associated services provided to ensure that such students are not placed at a substantial disadvantage in comparison with other students. This is a broad expression that covers all aspects of Foundation life, for example:

15.2.1 the curriculum;

15.2.2 classroom organisation and timetabling;

- 15.2.3 access to Foundation facilities;
 - 15.2.4 clubs and visits;
 - 15.2.5 Foundation sports; and
 - 15.2.6 Foundation policies.
- 15.3** Reasonable adjustments may typically include (by way of example only):
- 15.3.1 making arrangements for a child in a wheelchair to attend an interview in an accessible ground floor room;
 - 15.3.2 allowing extra time for a dyslexic child to complete an entrance exam;
 - 15.3.3 providing examination papers in larger print for a child with a visual impairment;
 - 15.3.4 rearranging the timetable to allow a student to attend a class in an accessible part of the building;
 - 15.3.5 arranging a variety of accessible sports activities.
- 15.4** In making reasonable adjustments the Foundation is required to provide auxiliary aids and services for disabled students where to do so would be reasonable. The Foundation will carefully consider any proposals made by parents and will not unreasonably refuse any requests for such aids and services.
- 15.5** As well as providing educational services, the Foundation provides services to the public, for example at:
- 15.5.1 open days;
 - 15.5.2 parents' evenings;
 - 15.5.3 concerts and plays;
 - 15.5.4 exhibitions;
 - 15.5.5 conferences/events (including residential during holiday periods);
 - 15.5.6 use of sports facilities.
- 15.6** When providing such services the Foundation will make reasonable adjustments to ensure that disabled people are able to use the Foundation's services as far as is reasonable to the same extent and standard as non-disabled people.
- 15.7** For reasonable adjustments for staff please see the equal opportunities policy for staff.
- 15.8** **Informing the Foundation:** in accordance with the Foundation's terms and conditions, parents of students must notify the relevant Head of School in writing if they are aware or suspect that the student (or prospective student) has a disability or if the student (or prospective student) has a learning difficulty. The registration form enables prospective parents to give details of their child's disability when applying for a place at the Foundation. Parents must provide copies of all written reports and other relevant information upon request. Providing the Foundation with such information will enable the Foundation to support the student as much as possible. Confidential information of this kind will only be communicated on a "need to know" basis. The Foundation will have due regard to any request made by a parent or student (who has sufficient understanding of the nature and

effect of the request) to treat the nature or existence of the person's disability as confidential.

15.9 Admission of children with a disability or special educational need: applications for a place at the Foundation will be considered on the basis that reasonable adjustments have been made by the Foundation in order to cater for the child's disability or other arrangements for a child's special educational need where this does not fall within the definition of "disability". The Foundation will not offer a place if, after all reasonable adjustments or other arrangements have been made, the Foundation will not be able to provide adequately for the student's physical and educational needs. The Foundation shall inform the parents of their decision and give details of the reasonable adjustments or other arrangements they are going to make or give reasons why an offer of a place has not been made.

15.10 Existing students: where the Foundation becomes aware of a disability of an existing student or the special educational need of an existing student where this does not fall within the definition of "disability", the Foundation will do all that is reasonable to assist the student whilst at the Foundation, which may include making reasonable adjustments or other arrangements. If in the professional judgement of the relevant Head of School, and after consultation with the parents and the student (where appropriate), the Foundation cannot provide adequately for the student's physical and educational needs after all reasonable adjustments or other arrangements have been made, parents will be asked to withdraw the student, without being charged fees in lieu of notice and with the acceptance deposit returned. The Foundation will do what is reasonable to help parents to find an alternative placement which will provide their child with the necessary environment and level of teaching and support.

15.11 Access: the Foundation will monitor the physical features of its premises to consider whether disabled users of the premises are placed at a substantial disadvantage compared to other users. Where possible and proportionate, the Foundation will take steps to improve access for disabled users of the premises. The Foundation has an Accessibility Plan, which is kept under review and revised as necessary. The plan is available on request from the Vice Principal.

16 Students with EHC Plans

16.1 The Foundation's policy on special educational needs includes details about the welfare and educational provision for students with EHC Plans.

17 Students with English as an additional language

17.1 Students with English as an additional language will receive additional learning support if necessary. The Foundation will consult with the student and the parents as appropriate. The Foundation has appropriate welfare support for all such students through the supportive House culture. See also the Foundation's English as an Additional Language Policy.

18 Provision for students with particular religious, dietary, language or cultural needs

18.1 Individual Needs: The Foundation is keen to respect individual needs and the Foundation will actively:

- promote racial equality and good race relations,
- promote equality of opportunity and access, and
- oppose all forms of prejudice and negative discrimination.

18.2 Catering: The Foundation can provide for most special dietary requirements whether related to allergens, intolerance or for religious or cultural reasons. Individual care plans are created for students with food allergies, if necessary. Allergen Ambassadors are identified within the catering team and students are encouraged to ask the catering team if they have a specific allergy to make sure that they know exactly what each dish contains.

Provision is made in the boarding houses to provide meals outside standard times if required for religious reasons.

18.3 Religious and cultural needs: The Foundation will ensure there is space available on each site to allow students and staff of any belief to carry out their religious observances during break and lunch time, or as required. The Foundation will grant requests of absence wherever possible on grounds of belief. The majority of school assemblies are non-denominational and cater for students of any or no religion. Parents may write to the relevant Head of School if they wish to withdraw their child from assemblies/events or SRE education on religious or cultural grounds. The Foundation, through the pastoral structure, will make every effort to support individual students with particular cultural needs (religious, ethnic, creative, etc.) provided that the same are consistent with the law and the inclusive ethos and tradition of the Foundation.

Boarding students are provided with a list of different places of worship in the local area. The boarding houses are multicultural with students from all around the world and boarding students are encouraged to share their cultural traditions and celebrate festivals with their peers and the boarding house staff.

18.4 Language: The Foundation attempts to use succinct and straightforward language whenever possible. The Foundation will also make reasonable adjustments to ensure that parents and students for whom English is an Additional Language (EAL) will be able to access school material. Students for whom English is not a first language receive support, as appropriate, from specialist EAL teachers. International boarding students have opportunities to speak in their first languages but are encouraged to speak in English when in mixed groups.

19 Training

19.1 The Foundation ensures that regular guidance and training is arranged on induction and at regular intervals thereafter so that staff and volunteers understand what is expected of them by this policy and have the necessary knowledge and skills to carry out their roles.

19.2 The level and frequency of training depends on the role of the individual member of staff.

19.3 The Foundation maintains written records of all staff training.

20 Risk assessment

20.1 Where a concern about a student's welfare is identified, the risks to that student's welfare will be assessed and appropriate action will be taken to reduce the risks identified.

20.2 The format of risk assessment may vary and may be included as part of the Foundation's overall response to a welfare issue, including the use of individual student welfare plans (such as behaviour, healthcare and education plans, as appropriate). Regardless of the form used, the Foundation's approach to promoting student welfare will be systematic and student focused. Please see clause 4 for details of the individuals with responsibility for carrying out, monitoring, implementing and reviewing the effectiveness of risk assessments under this policy. See also the Foundation's Risk Assessment Policy for Student Welfare.

21 Record keeping

21.1 All records created in accordance with this policy are managed in accordance with the Foundation's policies that apply to the retention and destruction of records.

21.2 All reported breaches of this policy will be recorded and this record will be reviewed annually by the Principal and Vice-Principal and reported to the Governing Body.

21.3 The information created in connection with this policy may contain personal data. The Foundation's use of this personal data will be in accordance with data protection law. The Foundation has published privacy notices on its website which explain how the Foundation will use personal data.

Reviewed: September 2023

Version control

Date of adoption of this policy	October 2023
Date of last review of this policy	September 2023
Date for next review of this policy	September 2024
Policy owner	Director of Educational Strategy
Authorised by	Principal and Heads of Section
Circulation	Governors / all staff / parents / students Published on the Foundation's website and available from the relevant School Office on request