

THOMAS MILLS HIGH SCHOOL & SIXTH FORM



TRUSTEE POLICY DOCUMENT 5

Whole-School Equality, Equity, Diversity and Inclusion Policy

Date approved by Board of Trustees	24 th March 2026
Next review due:	Spring term 2029
Policy review cycle:	Every 3 years
Policy Owner:	Deputy Headteacher

Vision Statement

'Together we aim high, discover talents, and build a brighter future'

Thomas Mills High School is an Academy and a company limited by guarantee incorporated in England & Wales under number 7605059

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1. Statement of intent

Thomas Mills High School & Sixth Form is committed to eliminating unlawful discrimination, harassment and victimisation; advancing equality of opportunity; and fostering good relations across our whole community. We are dedicated to ensuring every pupil receives an education that enables them to fulfil their potential, to promoting mental health and wellbeing, and to creating a working environment where all staff and applicants are treated with dignity and respect and can be their authentic selves. We celebrate diverse identities and take a zero-tolerance approach to discrimination.

The national context informs our equality objectives. We are conscious of tackling racism, anti-Semitism, Islamophobia, misogyny, homophobia, biphobia, transphobia, ableism.

2. Legal framework

- Human Rights Act 1998
- Equality Act 2010 and the Equality Act 2010 (Specific Duties) Regulations 2011
- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Protection from Harassment Act 1997
- Worker Protection (Amendment of Equality Act 2010) Act 2023

This policy should be read alongside: SEND Policy; Supporting Pupils with Medical Conditions Policy; Attendance Policy; RSHE Policy; School Uniform Policy; Admissions Policy; Anti-bullying Policy; Child Protection and Safeguarding Policy; Complaints Policy; Grievance Policy; Disciplinary Policy and Procedure; Flexible Working Policy; Teacher Performance Management Policy; Support Staff Performance Management Policy.

3. Public Sector Equality Duty (PSED)

We will have due regard to the need to: (a) eliminate unlawful discrimination, harassment, victimisation and other prohibited conduct; (b) advance equality of opportunity between people who share a protected characteristic and those who do not; and (c) foster good relations between people who share a protected characteristic and those who do not.

4. Scope and principles

This policy applies to all aspects of our work and learning environment for pupils, staff, job applicants, parents/carers, governors/trustees, volunteers, contractors and visitors. We will:

- Create an environment free from bullying, harassment, victimisation and unlawful discrimination.
- Apply principles of equity to ensure equality of opportunity for pupils and staff.
- Take proportionate positive action where lawful to alleviate disadvantage and widen participation.
- Make reasonable adjustments for disabled pupils, staff and applicants.
- Implement policies and procedures on a fair and impartial basis.
- Use data to understand needs, monitor impact and inform action plans.

5. Roles and responsibilities

Trust board

- Ensure compliance with equality legislation and this policy.
- Publish annual equality information and set/update equality objectives at least every four years.
- Monitor workforce composition and pupil data, and assess policy effectiveness.
- Approve and review this policy and related action plans every 3 years.

Headteacher

- Champion and implement this policy and ensure fair application across the school.
- Ensure training, guidance and resources are in place.
- Monitor and report progress to the board.
- Ensure appropriate support for pupils and staff, including referral to support services where needed.

Senior Management Team (SMT)

- Lead by example and set appropriate standards of behaviour.
- Ensure decisions on recruitment, development and promotion are based on merit and are free from discrimination.
- Review practices and update them in line with changes in law and guidance.
- Oversee day-to-day operation of staff-related elements of this policy.
- Provide advice, organise training and keep records for monitoring.
- Ensure recruitment and employee relations processes align with this policy.
- Complete appropriate training on equal opportunities and inclusive recruitment.
- Support staff with reasonable adjustments and development opportunities.

All staff

- Treat colleagues, pupils and stakeholders with dignity and respect at all times.
- Avoid discrimination, harassment and victimisation and report concerns promptly.
- Support inclusion in the classroom and wider school life.

6. Protected characteristics

We will not discriminate against, harass or victimise anyone because of: age (staff only), disability (including mental health), gender reassignment, marriage and civil partnership (staff only), pregnancy and maternity, race, religion or belief, sex, or sexual orientation. We also protect against discrimination by association and by perception.

7. Forms of discrimination

- Direct discrimination (including associative and perception discrimination).
- Indirect discrimination.
- Harassment (including sexual harassment).
- Victimisation.
- Disability discrimination, including failure to make reasonable adjustments.

8. Staff-specific provisions

Recruitment and selection

- Conduct recruitment and promotion on merit against objective criteria that avoid discrimination, taking steps to broaden and diversify candidate pools.
- Avoid discriminatory wording and stereotyping in adverts; advertise to reach a diverse labour market.
- Do not ask about health or disability until after a conditional offer, other than permitted exceptions (e.g., intrinsic job requirements, assessment adjustments).
- Verify right to work in the UK fairly and consistently.
- Monitor anonymised applicant data to identify and address under-representation.

Staff training, progression and conditions of service

- Provide regular training on equality, diversity, inclusion, unconscious bias and the Staff Bullying and Harassment Policy.
- Identify development needs through appraisal/performance management and provide equitable access to opportunities.
- Monitor workforce composition, promotions, pay and access to benefits to ensure equality of opportunity.

Disability and reasonable adjustments (staff)

Encourage disabled staff to discuss adjustments with their line manager or HR. Consider requests carefully and implement reasonable adjustments wherever possible; where an adjustment is not reasonable, explain why and explore alternatives. Monitor the physical environment and make improvements where reasonable.

Part-time, zero hours, fixed-term employees and agency workers

Monitor conditions of service, access to benefits, training, progression and opportunities for permanency to ensure equity.

Termination of employment

Ensure decisions are fair, objective and non-discriminatory, in line with this policy and relevant procedures (e.g., Disciplinary, Capability).

Breaches of this policy (staff)

Handle alleged breaches under the Disciplinary and/or Grievance Procedures. Serious or deliberate discrimination, harassment or victimisation may constitute gross misconduct. Allegations raised in good faith will be treated seriously and without victimisation; false allegations made in bad faith may themselves be subject to disciplinary action.

9. Pupil-specific provisions

Sex

We will not single out pupils of one sex for less favourable treatment. Separation by sex will only occur where lawful and objectively justified (e.g., addressing disadvantage, different needs, disproportionately low participation), and will be regularly reviewed.

Race and ethnicity

We will not separate or treat pupils less favourably based on race or ethnicity. We may take proportionate positive action to alleviate disadvantage and address particular challenges affecting specific groups. Pupils with English as an Additional Language will be supported and treated fairly.

Disability (including mental health)

We will avoid rules that adversely affect disabled pupils unless objectively justified. We will make reasonable adjustments and provide auxiliary aids where necessary, including where a pupil has SEND with or without an EHC plan. We will implement and review our Accessibility Plan and our SEND Policy.

Religion and belief

We will not treat pupils less favourably because of their religion/belief or lack thereof. We will provide appropriate space and consideration for religious observance and handle related absence in line with our Attendance and Absence Policy.

Sexual orientation

We will ensure pupils are taught about relationships and families in line with law and our RSHE Policy, in an age-appropriate and inclusive way. We will support LGBTQ+ pupils and provide safe spaces to discuss issues without fear of discrimination.

Gender reassignment

We recognise gender reassignment as a social and/or medical process. We will ensure pupils are not treated less favourably because they are trans or associated with trans people. We will follow the guidance in Keeping Children Safe in Education and are mindful about safeguarding and parental responsibilities.

Pregnancy and maternity (pupils)

We will not treat pupils less favourably due to pregnancy, maternity, having children or breastfeeding. We will make reasonable adjustments. Where a pupil cannot attend, the LA retains the duty to arrange suitable education (Education Act 1996, s.19).

Looked-after and previously looked-after children (LAC/PLAC)

Admissions will follow our Admissions Policy. We will implement and monitor Personal Education Plans and provide appropriate transition and catch-up support. SEND will be identified and met in line with our SEND Policy.

Curriculum and teaching

We will deliver a balanced curriculum that promotes equality, diversity and acceptance and avoids prejudicial stereotypes. Inclusive teaching strategies will be observed and reviewed as part of our leadership monitoring programme. Parents retain the right to withdraw their child from sex education (where applicable).

Promoting inclusion and school culture

- Use pupils' preferred names and pronunciations.
- Seek diversity across governance and staffing where possible.
- Challenge prejudiced assumptions, attitudes and behaviours.
- Value cultural experiences and contributions of all pupils.
- Ensure equal access to opportunities (curriculum and extracurricular).

- Communicate this policy to parents/carers and discuss equality via pupil voice mechanisms (e.g., school council).

Bullying, discrimination and safeguarding

We will use the Anti-bullying Policy alongside this policy to prevent and address discriminatory incidents. Incidents with safeguarding implications will be handled in line with the Child Protection and Safeguarding Policy, involving external agencies (e.g., social care, police) where appropriate. Concerns about how incidents are handled will be addressed via the Complaints Procedure.

Pupils who have left school

Our duty not to discriminate, harass or victimise continues in relation to actions connected to former pupils, such as the provision of references.

Publication under the PSED

We will publish annual information evidencing compliance with the PSED and set/update equality objectives at least every four years. We will not pressure pupils to provide sensitive data; we will collect and use data lawfully and proportionately.

10. Equality Impact Assessment (EIA)

The EIA will help to ensure that:

- we understand the potential effects of the policy by assessing the impacts on different groups both external and internal
- any adverse impacts are identified and actions identified to remove or mitigate them
- decisions are transparent and based on evidence with clear reasoning.

An EIA should be completed when the need for a new policy or practice is identified, or when an existing one is reviewed.

11. Monitoring and review

This policy will be reviewed every 3 years. Next review due: Spring term 2029. We will assess effectiveness through data on applications, recruitment, retention, progression, pay, complaints and incident handling (staff), as well as attendance, behaviour, attainment/progress, wellbeing and participation (pupils). We will use findings to target training and update our action plans, and invite feedback from staff, pupils and stakeholders to support continuous improvement.

Appendix A: Equality Act 2010—Protected characteristics (summary)

- Age: protects people of all ages (employment context).
- Disability: physical or mental impairment with substantial, long-term adverse effect on normal day-to-day activities.
- Gender reassignment: proposing to undergo, undergoing or having undergone a process to reassign sex.
- Marriage and civil partnership: protects married and civil-partnered people (employment context).
- Pregnancy and maternity: protects during pregnancy and statutory/contractual maternity leave.
- Race: includes colour, nationality, and ethnic or national origins.
- Religion or belief: any religion or philosophical belief, or lack of religion/belief.
- Sex: male or female.
- Sexual orientation: attraction towards the same sex, opposite sex or both.