ST ALBANS
EDUCATION GROUP

Equal Opportunities

September 2026

A group of sector-leading Independent Schools

STAHS Policies

P13: EQUAL OPPORTUNITIES

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Contents

Legal Framework 3

1. Equal Opportunities: Pupils 3

2. Roles and Responsibilities 4

3. Protected Characteristics 4

4. Sex 5

5. Race and Ethnicity 5

6. Disability 5

7. Religion and Belief 6

8. Sexual orientation 6

9. Gender reassignment 6

10. Pregnancy and maternity 7

11. Looked after children (LAC) 7

12. The Curriculum 8

13. Promoting inclusion 8

14. Supporting pupils with medical conditions 8

15. Bullying and discrimination 9

16. Staff training 9

17. Equal Opportunities and Dignity at Work: Staff 10

18. Who is covered by this policy? 10

19. Responsibilities 10

20. Scope and Purpose 10

21. Forms of discrimination 11

22. Recruitment and selection 11

23. Staff training and promotion and conditions of service 12

24. Termination of employment 12

25. Disability discrimination 12

26. Zero hours, Fixed-term employees and agency workers 13

27. Part-time work 13

28. Breaches of this policy 13

Policy Information 14

Legal Framework

This policy has due regard to statutory legislation, including, but not limited to, the following:

- Human Rights Act 1998
- The Equality Act 2010
- Data Protection Act 2018

This policy has due regard to statutory guidance, including, but not limited to, the following:

- DfE (2014) 'The Equality Act and schools'
- DfE (2018) 'Promoting the education of looked after children and previously looked after children'
- DfE (2018) 'Gender Separation in mixed schools'
- DfE (2014) 'Equality Act 2010: advice for schools'
- DfE (2018) 'Mental health and wellbeing provision in schools'

This policy is related to the following other school policies:

- P01: Safeguarding and Child Protection Policy
- P04: Behaviour Management Policy
- P05: Anti-bullying Policy
- P08: Teaching, Learning and Assessment Policy
- P11: Complaints Policy
- P14: Data Protection Policy

1. EQUAL OPPORTUNITIES: PUPILS

1.1. STAHS understands that, under the Equality Act 2010, all schools have a duty to:
- Eliminate unlawful discrimination, harassment and victimisation;
- Advance equality between different groups;
- Foster good relations between different groups; and
- Promote mental health and wellbeing.

1.2. Our School's overall values are underpinned by our statutory duties under the Equality Act 2010. We are dedicated to ensuring that every pupil receives an education that offers them the best chance at fulfilling their potential, and to promoting mental wellbeing amongst our pupils. We have developed this policy to provide a clear framework for how we will achieve our School's aims.

1.3. Our school's demographic state is directly linked to our overall aims for achieving equality. Specifically, we aim to:
- Ensure that no pupil is subject to racist behaviour, language or actions;
- Ensure that no pupil is subject to abuse or discrimination based on their LGBTQ+ identity;
- Ensure that all pupils are treated fairly and with dignity and have equal access to education and services regardless of disability.

1.4. To achieve our aims, we will adopt the following methods:
- Embedding equality within teaching and resources
- Using key data indicators to understand the needs and characteristics of our school
- Promoting community cohesion
- Promoting parental engagement
- Investing in regular staff training
- Using key data, such as measures of wellbeing, to monitor the progress of pupils with protected characteristics

- Regularly reviewing our equality policy to ensure it reflects current trends and issues

2. Roles and Responsibilities

2.1. Governors and the Principal will:

- Be responsible for ensuring the School complies with the appropriate equality legislation and regulation.
- Take all reasonable steps to ensure pupils and prospective pupils will not be discriminated against, harassed or victimised in relation to:
  - Admissions.
  - The way the School provides education for pupils.
  - How pupils are provided with access to benefits, facilities and services.
  - The exclusion of pupils or subjecting pupils to any other detriment.

2.2. The Head will:

- Implement this policy, ensuring that all staff and pupils apply its guidelines fairly in all situations.
- Conduct regular training sessions to ensure all members of staff are aware of their responsibilities, as well as to develop their skills and knowledge.
- Review and amend this policy, considering new legislation and government guidance, and previously reported incidents, in order to improve procedures.
- Ensure that appropriate support is made available for pupils who require immediate interventions, parental assistance and personal counselling.

2.3. Staff will:

- Be alert to the possible harassment of pupils, both inside and outside of the school, and to deal with incidents of harassment/discrimination as the highest priority.
- Carry out their statutory duties relating to equal opportunities, inclusivity and pertaining to their specific roles.
- Have due regard to the sensitivities of all pupils and not provide material that may cause offence.

3. Protected Characteristics

3.1. We will not discriminate against, harass or victimise a pupil, or prospective pupil, because of their:

- Sex.
- Race.
- Disability, which includes mental health, encompassing prejudiced assumptions, attitudes or behaviours related to mental health.
- Religion or belief.
- Sexual orientation.
- Gender reassignment.
- Pregnancy or maternity.

3.2. We will not discriminate against a pupil, or prospective pupil, because of a characteristic related to a person, such as a parent, with whom the pupil or prospective pupil is associated.

3.3. We will not discriminate against a pupil, or prospective pupil, because of a characteristic which they are believed to have, even if the belief is mistaken.

3.4. We will regularly review our school practices to ensure that they are fair with regard to all the protected characteristics listed in 4.1.

4. Sex

4.1. For the purpose of this policy, sex refers to the pupils' biological assignment at birth depending on their reproductive organs. We understand some pupils may wish to identify with another gender, and we will support pupils through their transitioning phases.

5. Race and Ethnicity

5.1. We will ensure that pupils of all races and ethnicities (including those who have English as an Additional Language) are not singled out for different and less favourable treatment from that given to other pupils, regularly reviewing our school practices to ensure that they are fair.

5.2. We will not segregate pupils on the basis of their race or ethnicity, understanding that claims of 'separate but equal' will not be tolerated, and that such actions will always be viewed as direct discrimination.

5.3. We may, however, take positive action to address the particular challenges affecting pupils of one racial or ethnic group, where this can be shown to be a proportionate way of dealing with such issues.

6. Disability

6.1. We will ensure that pupils with disabilities are not singled out or treated less favourably than other pupils simply because they have a disability, which includes any mental health issue, regularly reviewing our school practices to ensure they are fair.

6.2. We will ensure that we do not discriminate against pupils with a disability by implementing a rule for all pupils that could have an adverse effect on pupils with disabilities only, unless it is for a legitimate reason and is a proportionate way of achieving that legitimate aim.

6.3. We will ensure that we do not discriminate against pupils with disabilities because of something which is a consequence of their disability, unless it is for a legitimate reason and is a proportionate way of achieving that legitimate aim.

6.4. We will make any reasonable adjustments required. Depending on the circumstances, either the School or the family will be responsible for providing necessary auxiliary aids, to ensure the full inclusion of pupils with disabilities. This applied to all pupils with disabilities, including those who do not have a SEND statement or Education, Health and Care (EHC) plan.

6.5. We will meet our duty to undertake accessibility planning for pupils with disabilities and ensure that an Accessibility Plan is implemented and reviewed where necessary.

6.6. The school adheres to our Teaching, Learning and Assessment Policy containing further information addressing equal opportunities for pupils with SEND.

7. Religion and Belief

7.1. We will ensure that pupils are not singled out or treated less favourably because of their religion or belief, regularly reviewing our school practices to ensure that they are fair.

7.2. We will ensure that pupils are provided with the appropriate space in which they can practice their faith, e.g. to perform their daily prayers.

7.3. Absences in relation to religious observances will be handled in accordance with the school's Attendance Policy.

8. Sexual orientation

8.1. We will ensure that all gay, lesbian and bi-sexual pupils, or the children of gay, lesbian or bi-sexual parents, are not singled out for different or less favourable treatment from that given to other pupils, regularly reviewing our school practices to ensure that they are fair.

8.2. In the Senior School, we will ensure that pupils are taught about the nature of marriage, including same-sex marriage by presenting the facts of English law – teachers will not offer personal opinions when discussing marriage in Relationships and Sex Education (RSE) lessons.

8.3. We will ensure that any religious beliefs with regards to sexual orientation are taught to pupils in an educational context, in a manner that is not prejudicial or discriminatory.

8.4. RSE lessons will be taught in accordance with our Pastoral Care and Personal Development Policy.

8.5. We will ensure that there is a designated safe space within our school where pupils can discuss issues of sexual orientation without fear of discrimination.

9. Gender reassignment

9.1. We will ensure that pupils are not singled out or treated less favourably because they have undergone, or are proposing to undergo, gender reassignment, social transition or have trans*[1] parents, regularly checking our school practices to ensure that they are fair.

9.2. We will not initiate any action regarding social transition and will only respond to requests for social transition from a pupil or her parents, in consultation with relevant clinicians. Members of staff will not adopt any changes relating to social transition (such as a name change) unless a decision has been made by the School.

[1] Trans* is an umbrella term that refers to all of the identities within the gender identity spectrum.

9.3. A pupil's parents will be involved from the outset in discussions where a pupil is considering social transition and their views given weight, except when it is decided by the DSL that informing parents could place the pupil at risk of harm.

9.4. We will take time to understand the thoughts and feelings of pupils who are questioning their gender and remain aware of their potential vulnerabilities, including the possibility of complex mental health needs and discriminatory bullying

9.5. Any agreed course of action for a gender questioning pupil will take into account the welfare of all those impacted. We recognise that decisions relating to social transition that protect pupil welfare may not be the same as a pupil's wishes. We recognise evidence that children who socially transition before puberty and / or prior to receiving clinical advice are more likely to proceed to a medical pathway and will factor this into decision making.

9.6. We will maintain clear and contemporaneous records of decisions involving gender-questioning pupils, including the factors considered and the professionals involved.

9.7. In consultation with parents, we will make reasonable adjustments to accommodate absence requests for treatment and support of gender questioning pupils by external sources.

9.8. The School Dress Code provides adequate flexibility for gender expression.

9.9. The school will provide female only toilets and changing spaces for pupils, and female only accommodation on trips. Where a pupil does not wish to use the female only toilets or changing spaces, the school will consider alternative arrangements on a case-by-case basis but will not allow biologically female pupils into toilets or changing spaces designated for males.

9.10. We will ensure that there is a designated safe space within our school where gender questioning pupils or pupils who have socially transitioned can discuss issues of gender without fear of discrimination. We will provide the same support to pupils who wish to de-transition.

10. Pregnancy and maternity

10.1. We will ensure that pupils are not singled out or treated less favourably because they become pregnant, or have recently given birth, or because they are breastfeeding.

10.2. We will make reasonable adjustments to accommodate absence requests for the treatment and support of pupils who are pregnant or have just given birth.

11. Previously Looked after children (LAC)

11.1. LAC, and previously LAC (PLAC), will be given the highest priority for admissions, as per the requirements of our Admissions Policy.

11.2. We will ensure that pupils are not singled out or treated less favourably because they are looked after, or have previously been looked after, by the state.

11.3. A personal education plan will be created, and implemented, for all LAC and PLAC, to ensure that their education and development needs are fully covered, including appropriate transition and catch-up support to ensure that they do not fall behind.

11.4. We will ensure that any SEND that a LAC or PLAC has, are duly taken into account and addressed, whether this is with or without a SEND statement or EHC plan.

12. The Curriculum

12.1. We believe that pupils should be exposed to thoughts and ideas of all kinds, however challenging or controversial, and will not make any unjustified changes to our curriculum content on the grounds of any protected characteristics that a pupil may have.

12.2. We will ensure, however, that the curriculum is as balanced as possible, and delivered in such a way that prevents discrimination, and the promotion of prejudicial stereotypes.

12.3. To ensure equality, diversity and tolerance is taught and promoted throughout each subject area.

12.4. The observation of inclusive teaching strategies is a key aspect of the SLT's annual programme of monitoring.

12.5. We will respect the right of parents to withdraw their child from RSE.

13. Promoting inclusion

13.1. We will promote inclusion and equality at our school through:

- Ensuring that pupils are called by their preferred names, taking into account the correct spelling, structure and pronunciation.
- Ensuring, as far as possible, that our governing board and staff reflect the full diversity of our local community.
- Providing an environment where prejudiced assumptions, attitudes and behaviours are continually challenged.
- Instilling in pupils an awareness of prejudice, giving them confidence that it can, and must, be eradicated.
- Providing a variety of educational and residential visits that expose pupils to a wide range of cultural experiences.
- Ensuring equal access to opportunities, such as extra-curricular activities and the curriculum.
- Taking care in the use of language and the choice of resources, so that teaching and non-teaching staff avoid reinforcing stereotypical views of society.
- Valuing the cultural experiences and contributions of all pupils, regardless of any protected characteristic that they may have.
- Communicating our policy to parents to gain their understanding, agreement and support for its provisions.
- Promoting equality of opportunity within the wider society.

14. Supporting pupils with medical conditions

14.1. We will ensure that any medical conditions related to a pupil with a protected characteristic is fully supported in line with our Pupil Mental and Physical Health Policy.

15. Bullying and discrimination

15.1. Our Anti-bullying Policy will be used in conjunction with this policy in order to prevent, and effectively deal with, any discriminatory incidents.

15.2. Any incidents of a child protection or safeguarding nature will be reported, recorded and dealt with in line with the process in our Child Protection and Safeguarding Policy.

15.3. It the responsibility of the Head in consultation with the DSL to decide whether it is appropriate to notify social services, and/or the police, of any incident.

15.4. Concerns with regards to the handling of bullying and discrimination incidents will be dealt with via the procedures outlined in our Complaints Procedures Policy.

16. Staff training

16.1. New staff will receive relevant training on the provisions of this policy during their HR induction.

16.2. Whole-school staff training for will be delivered in-house on a termly basis.

16.3. Staff will receive the appropriate equalities training that will:

- Focus on staff specialisms in relation to equality, for example, a focus on homophobic bullying to address a planned approach towards inclusion.
- Ensure all staff are aware of, and comply with, current equalities legislation and government recommendations.
- Ensure all staff are aware of their responsibilities and how they can support pupils with protected characteristics.
- Provide support for teachers to effectively manage any discrimination towards pupils with protected characteristics.
- Provide up-to-date information on the terms, concepts and current understandings relating to each of the protected characteristics.
- Develop appropriate strategies for communication between parents, educators and pupils about any issues related to a protected characteristic.
- Ensure that the school is aware of, and participates in, relevant awareness days, such as Black History Month, PRIDE, and International Women's Day.

17. EQUAL OPPORTUNITIES AND DIGNITY AT WORK: STAFF

17.1. STAHS is committed to promoting equality of opportunity for all staff and job applicants. We aim to create a working environment in which all individuals are able to make best use of their skills, free from discrimination or harassment, and in which all decisions are based on merit.

17.2. We do not discriminate against staff on the basis of age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation (protected characteristics) in line with the Equality Act 2010.

17.3. The principles of non-discrimination and equality of opportunity also apply to the way in which staff treat students, parents, governors, third party organisations and former staff members.

17.4. All staff have a duty to act in accordance with this policy and treat colleagues with dignity at all times, and not to discriminate against or harass other members of staff, regardless of their status.

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

18.Who is covered by this policy?

18.1. This policy covers all individuals working at all levels and grades, including members of the Executive and Senior Leadership Teams, teachers, teaching assistants, support staff, trainees, home workers, part-time and fixed-term employees, volunteers, interns, casual workers and agency staff (collectively referred to as staff in this policy).

19.Responsibilities

19.1. Our Board of Governors (The Council) has overall responsibility for the effective operation of this policy and for ensuring compliance with discrimination law. Day-to-day operational responsibility, including regular review of this policy, has been delegated to the Executive Team.

19.2. All members of the Executive and Senior Leadership Teams within the School must set an appropriate standard of behaviour, lead by example and ensure that those they manage adhere to the policy and promote our aims and objectives with regard to equal opportunities. Managers will be given appropriate training on equal opportunities awareness and equal opportunities recruitment and selection best practice. The Group HR Director has overall responsibility for equal opportunities training.

20.Scope and Purpose

20.1. This policy applies to all aspects of our relationship with staff and to relations between staff members at all levels. This includes job advertisements, recruitment and selection, training and development, opportunities for promotion, conditions of service, pay and benefits, conduct at work, disciplinary and grievance procedures, and termination of employment.

20.2. We will take appropriate steps to accommodate the requirements of different religions, cultures, and domestic responsibilities. Please refer to the School's HR and Employment Policies, including Flexible Working, for further details.

21. Forms of discrimination

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

21.2. Direct discrimination occurs where someone is treated less favourably because of one or more of the protected characteristics set out above. For example, rejecting an applicant on the grounds of their race because they would not "fit in" would be direct discrimination.

21.3. Indirect discrimination occurs where someone is disadvantaged by an unjustified provision, criterion or practice that also puts other people with the same protected characteristic at a particular disadvantage. For example, a requirement to work full time puts women at a particular disadvantage because they generally have greater childcare commitments than men. Such a requirement will need to be objectively justified.

21.4. Harassment related to any of the protected characteristics is prohibited. Harassment is unwanted conduct that has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.

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

22. Recruitment and selection

22.1. We aim to ensure that no job applicant suffers discrimination because of any of the protected characteristics above. Our recruitment procedures are reviewed regularly to ensure that individuals are treated on the basis of their relevant merits and abilities. Job selection criteria are regularly reviewed to ensure that they are relevant to the job and are not disproportionate. Short listing of applicants is completed by more than one person wherever possible.

22.2. Job advertisements will avoid stereotyping or using wording that may discourage groups with a particular protected characteristic from applying. We take steps to ensure that our vacancies are advertised to a diverse labour market.

22.3. Applicants will not be asked about health or disability before a job offer is made. There are limited exceptions which will only be used with the HR's approval. For example:

- Questions necessary to establish if an applicant can perform an intrinsic part of the job (subject to any reasonable adjustments).
- Questions to establish if an applicant is fit to attend an assessment or any reasonable adjustments that may be needed at interview or assessment.
- Positive action to recruit disabled persons.
- Equal opportunities monitoring (which will not form part of the decision-making process).

22.4. Applicants will not be asked about past or current pregnancy or future intentions related to pregnancy. Applicants will not be asked about matters concerning age, race, religion or belief, sexual orientation, or gender reassignment without the approval of the Group HR Director (who will first consider whether such matters are relevant and may lawfully be taken into account).

22.5. We are required by law to ensure that all staff are entitled to work in the UK. Assumptions about immigration status will not be made based on appearance or apparent nationality. All prospective employees, regardless of nationality, will be expected to produce original documents (such as a passport) before employment starts, to satisfy current immigration legislation. The list of acceptable documents is available from the UK Border Agency.

22.6. To ensure that this policy is operating effectively, and to identify groups that may be underrepresented or disadvantaged in our organisation, we monitor applicants' ethnic group, gender, disability, sexual orientation, religion and age as part of the recruitment procedure. Provision of this information is voluntary and it will not adversely affect an applicant's chances of recruitment or any other decision related to their employment. The information is removed from applications before short listing, and kept in an anonymised format solely for the purposes stated in this policy. Analysing this data helps us take appropriate steps to avoid discrimination and improve equality and diversity.

23. Staff training and promotion and conditions of service

23.1. Staff training needs will be identified through regular staff performance development. All staff will be given appropriate access to training to enable them to progress within the organisation and all promotion decisions will be made on the basis of merit.

23.2. Workforce composition and promotions will be regularly monitored to ensure equality of opportunity at all levels of the organisation. Where appropriate, steps will be taken to identify and remove unjustified barriers and to meet the special needs of disadvantaged or underrepresented groups.

23.3. Our conditions of service, benefits and facilities are reviewed regularly to ensure that they equal opportunities for all.

24. Termination of employment

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

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

25. Disability discrimination

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

25.2. If you experience difficulties at work because of your disability, you may wish to contact your line manager or Human Resources to discuss any reasonable adjustments that would help overcome or

minimise the difficulty. Your line manager or a member of the HR team may wish to consult with you and a medical adviser(s) about possible adjustments. We will consider the matter carefully and try to accommodate your needs within reason. If we consider a particular adjustment would not be reasonable, we will explain our reasons and try to find an alternative solution where possible.

25.3. We will monitor the physical features of our premises to consider whether they place disabled workers, job applicants or service users at a substantial disadvantage compared to other staff. Where reasonable, we will take steps to improve access for disabled staff and service users.

26.Zero hours, Fixed-term employees and agency workers

26.1. We monitor our use of zero hours guaranteed and fixed-term employees and agency workers, and their conditions of service, to ensure that they are being offered appropriate access to benefits, training, promotion and permanent employment opportunities. We will, where relevant, monitor their progress to ensure that they are accessing permanent vacancies.

27.Part-time work

27.1. We monitor the conditions of service of part-time employees and their progression to ensure that they are being offered appropriate access to benefits and training and promotion opportunities. We will ensure requests to alter working hours are dealt with appropriately under our Flexible Working Policy.

28.Breaches of this policy

28.1. If you believe that you may have been discriminated against you are encouraged to raise the matter through our Grievance Procedure. If you believe that you may have been subject to harassment you are encouraged to raise the matter with your line manager and / or a member of the HR team.

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

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

POLICY INFORMATION

Policy and related documents	
Document title	**Availability**
P13: Equal Opportunities	Yes – on website
Accessibility Plan	Yes – on website

Policies and related documents as indicated are available request from info@STAHS.org.uk.
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This policy can be made available in large print or other accessible format if required.