

INCLUSIVE | MULTI ACADEMY TRUST

DIVERSITY, EQUITY AND INCLUSION POLICY AND PLAN

DOCUMENT DETAIL

Approving Body	Trust Board
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Scheduled Review	Yearly
Date of Policy	December 2023
Next review	December 2024

Summary

The Inclusive Multi Academy Trust is committed to promoting equity and diversity across its schools. Its aim is to create an environment where staff and students feel welcomed, valued and able to fully participate, regardless of background or identity. The Trust does not tolerate any discrimination or harassment on the basis of protected characteristics like age, disability, gender identity, race, religion, or sexual orientation. Intersecting identities are also recognised.

All staff must treat colleagues and students with dignity and respect. The school commits to fostering an inclusive culture, seeking diverse representation in its workforce, removing barriers to access and opportunity, equipping its community to challenge prejudice, and regularly assessing policies and practices to drive continuous improvement on equity and inclusion.

The policy covers recruitment, selection, training, promotion, conditions of service, and termination of employment. It aims to ensure no discrimination occurs at any stage and that workforce diversity is proactively monitored. Requirements relating to immigration status checks are outlined. Disability discrimination is addressed through encouraging disclosure to enable support, monitoring premises accessibility, and making reasonable adjustments. Part-time, zero-hours and agency workers have appropriate access to benefits and opportunities.

Breaches are treated seriously, with disciplinary action taken for misconduct. Staff believing they have faced discrimination should raise a grievance. Monitoring and annual review ensures the policy remains up-to-date and effective.

For the purpose of this policy, the term school and schools refer to schools that are part of the Inclusive Multi Academy Trust

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Statement of intent

The Inclusive Multi Academy Trust is committed to promoting equity 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. We are committed to supporting our staff and applicants to be their authentic selves in the workplace without judgement and ensuring that diverse communities are celebrated.

We do not discriminate against staff on the basis of age, disability, gender identity and/or reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex, or sexual orientation (the protected characteristics), amended in line with the Equality Act 2010. More detail on each of the protected characteristics can be found in Appendix A.

We are also mindful of intersecting identities within our Trust environment and will work with our communities to better understand the experience of multiple minority identities for individuals.

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

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

This policy covers all individuals working at all levels and grades, including members of the SLT, teachers, TAs, learning mentors, 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).

Additionally, the policy covers all pupils, parents and community members who are attached to the school.

Legal framework

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

- Human Rights Act 1998
- Equality Act 2010
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Protection from Harassment Act 1997

This policy operates in conjunction with the following school policies:

- Grievance Policy
- Disciplinary Policy and Procedure
- Appraisal Policy

Public Sector Equality Duty (PSED)

PSED requires public bodies to have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act.
- Advance equality of opportunity between people who share a protected characteristic and people who do not share it.
- Foster good relations between people who share a protected characteristic and people who do not.

Principles underlying this policy

The Inclusive Multi Academy Trust was established in 2016 as a group of primary schools working in collaboration as one charitable entity, to improve and maintain high educational standards and offer life opportunities for our children and the community as a whole. Our schools all share the belief that a nurturing approach is at the heart of success.

We believe that:

- happy children learn
- happy staff thrive
- happy parents build a community

We promise that children in the Inclusive Multi Academy Trust will:

- feel welcome, valued and **safe**
- develop outstanding academic and social **skills**
- have **fun** whilst fostering an intrinsic love of learning
- **respect** and celebrate everyone's similarities and differences
- build lasting, healthy **relationships** and support networks
- engage with and contribute substantially to their local **community**

In accordance with this policy, the Trust commits to:

1. Foster an inclusive culture where all individuals feel welcomed, valued and empowered to fully participate and achieve their potential, regardless of background or identity.
2. Actively seek diversity and equitable representation across our workforce, leadership and governance that reflects the communities we serve.
3. Embed practices that eliminate discrimination and remove barriers to equal access, opportunity and advancement for students and staff.
4. Equip our community with the awareness, compassion and skills to challenge prejudice and understand different experiences and perspectives.
5. Teaching all aspects of DEI without personal bias, religious beliefs or political opinion.
6. Regularly assess our progress on equity, diversity and inclusion through stakeholder engagement, data analysis and review of policies and practices to drive continuous improvement.

This policy applies to all aspects of the Trust's 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.

Instances of bullying, harassment, victimisation and unlawful discrimination will be dealt with as misconduct, in line with the school's Grievance Policy and/or Disciplinary Policy and Procedure, and appropriate action will be taken. Particularly serious complaints could amount to gross misconduct and lead to dismissal without notice.

Sexual harassment may amount to both an employment rights matter and a criminal matter, such as in sexual assault allegations. Harassment under the Protection from Harassment Act 1997 – which is not limited to circumstances where harassment relates to a protected characteristic – is a criminal offence.

Roles and responsibilities

The Trust Board will be responsible for:

- Ensuring the effective operation of this policy.
- Ensuring compliance with discrimination law.
- Carry out their statutory duties relating to equal opportunities and inclusivity and pertaining to their specific roles.
- Assessing how this policy, and any supporting action plans, are working in practice, reviewing them annually, and considering and taking action to address any issues.
- Monitoring the composition of the Trust workforce regarding information such as age, sex, ethnic background, sexual orientation, religion or belief, and disability. (Resources committee)

The Local Governing Committees will be responsible for:

- Ensuring the effective operation of this policy.
- Ensuring compliance with discrimination law.
- Carry out their statutory duties relating to equal opportunities and inclusivity and pertaining to their specific roles.
- Monitoring the composition of the school workforce regarding information such as age, sex, ethnic background, sexual orientation, religion or belief, and disability.
- Reviewing how the supporting action plans, are working in practice.

The Headteacher will:

- Implement and champion this policy, ensuring that all staff and pupils apply its guidelines fairly in all situations.
- Consider this policy, taking into account new legislation and government guidance, and previously reported incidents, in order to recommend improve procedures to the Board.
- Carry out their statutory duties relating to equal opportunities and inclusivity and pertaining to their specific roles.
- Ensure that appropriate counselling is made available for pupils who require immediate interventions, parental assistance and personal counselling.

The SLT will be responsible for:

- Setting an appropriate standard of behaviour and leading by example.
- Ensuring that those they manage adhere to this policy and promote the school's aims and objectives with regard to equal opportunities.
- Taking appropriate steps to accommodate the requirements of different religions, cultures, and domestic responsibilities.
- Carry out their statutory duties relating to equal opportunities and inclusivity and pertaining to their specific roles.
- Ensuring staff are helped and encouraged to develop their full potential, so their talents and resources can be fully utilised to maximise the efficiency of the organisation.
- Making staff progression decisions based on merit (apart from in any necessary and limited exemptions and exceptions allowed under the Equality Act 2010).
- Reviewing employment practices and procedures where necessary to ensure fairness.
- Updating employment practices and procedures, and this policy, to take account of changes in the law.

All staff will be responsible for:

- Conducting themselves to help the Trust provide equal opportunities in employment, and prevent bullying, harassment, victimisation and unlawful discrimination.

- Understanding that they, as well as their employer, can be held liable for acts of bullying, harassment, victimisation and unlawful discrimination, in the course of their employment, against their colleagues, customers, suppliers, visitors and the public.
- Taking seriously complaints of bullying, harassment, victimisation and unlawful discrimination by their colleagues, customers, suppliers, visitors, the public and any others in the course of the school's work activities.
- Be alert to the possible harassment of pupils, both inside and outside of the school, and to deal with incidents of harassment and/or discrimination as the highest priority.
- Carry out their statutory duties relating to equal opportunities and inclusivity and pertaining to their specific roles.
- Have due regard to the sensitivities of all pupils, and not provide material that may cause offence.
- Act as a role model for equity, diversity and inclusion across the whole school community.

Forms of discrimination

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.

Direct discrimination occurs where someone is treated less favourably because of one or more of the protected characteristics outlined in [Appendix A](#). For example, rejecting an applicant on the grounds of their race because they would not "fit in" would be direct discrimination.

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.

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.

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.

Recruitment and selection

The Trust will aim to ensure that no job applicant suffers discrimination because of any of the protected characteristics. Our recruitment procedures will be reviewed regularly to ensure that individuals are treated on the basis of their relevant merits and abilities. Job selection criteria will be regularly reviewed to ensure that it is relevant to the job and not disproportionate. The shortlisting of applicants will be done by more than one person wherever possible.

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

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 head of HR's approval, such as:

- 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).

The Trust is 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, e.g. a passport, before employment starts, to satisfy current immigration legislation. The list of acceptable documents is available from the UK Border Agency.

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

Staff training and promotion and conditions of service

Staff training needs and associated development opportunities will be identified through regular staff appraisals, in line with the school's Appraisal Policy. All staff will be given appropriate access to training to enable them to progress within the organisation and all promotion decisions will be made based on merit. The school will adopt good practice in terms of data collection and use this data to monitor and measure the attraction, recruitment, retention and progression of staff.

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 needs of disadvantaged or underrepresented groups.

The Trust's conditions of service, benefits and facilities are reviewed regularly to ensure that they equal opportunities for all.

Termination of employment

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

We will also ensure that disciplinary procedures and penalties are applied without discrimination, whether they result in disciplinary warnings, dismissal or other disciplinary action, in line with the school's Disciplinary Policy and Procedure.

Disability discrimination

The Trust will encourage staff who are disabled or become disabled to inform the headteacher or their line manager about their condition so that the school can support them as appropriate.

Staff experiencing difficulties at work because of their disability (physical or otherwise) may wish to contact their line manager or the head of HR to discuss any reasonable adjustments that would help overcome or minimise the difficulty. Their line manager or the head of HR may wish to consult with the staff member and a medical adviser about possible adjustments.

The Local Governing Committee will monitor the physical environment of the school premises to consider whether certain features place physically disabled staff, job applicants, service users, or other stakeholders at a substantial disadvantage compared to others. Where reasonable, the school will take steps to improve access for disabled staff and service users.

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

The school will 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.

The school will monitor its use of zero hours 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. The school will, where relevant, monitor their progress to ensure that they are accessing permanent vacancies.

Breaches of this policy

If a member of staff believes that they may have been discriminated against, they will be encouraged to raise the matter through the school's Grievance Policy. If they believe that they may have been subject to harassment, they will be encouraged to raise the matter with their line manager and/or the Trust Chief Operating Officer.

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 Policy and Procedure.

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. The school takes a strict approach to serious breaches of this policy.

Monitoring and review

This policy will be reviewed annually.

Equality Act 2010 Protected Characteristics

The definitions used in this appendix are based on the Equality Act 2010, the full text of which is available [here](#).

Age: The Act protects people of all ages; however, differential treatment because of age is not unlawful direct or indirect discrimination if it can be justified, i.e. if you can demonstrate that it is a proportionate means of achieving a legitimate aim. Age is the only protected characteristic that allows employers to justify direct discrimination.

Disability: The Act protects people who are disabled; the Act defines this as someone who has a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities.

Gender identity and/or reassignment: The Act protects transgender people. The Act no longer requires a person to be under medical supervision to be protected, so a person who does not undergo any medical procedures would be covered by these protections.

Marriage and civil partnership: The Act protects people who are married or in a civil partnership against discrimination. Single people are not protected.

Pregnancy and maternity: The Act protects people against discrimination on the grounds of pregnancy and maternity during the period of their pregnancy and any statutory maternity leave to which they are entitled.

Race: The Act protects people of all races; the Act's definition of race includes colour, nationality, and ethnic or national origins.

Religion or belief: The Act protects people of any religion, including specific denominations or sects, as well as a lack of religion, i.e. employees or jobseekers who do not follow a certain religion or do not follow any religion are protected. The Act protects people of any belief; this is defined as any religious or philosophical belief, or a lack of such belief, that is a weighty and substantial aspect of human life and behaviour.

Sex: The Act protects men and women.

Sexual orientation: The Act protects lesbian, gay, bisexual and heterosexual staff.

Inclusive Multi Academy Trust Equity Plan 2023/24

Our Trust aim is for all children, staff and parents to identify with the following statements:

“No outsiders. All welcome”

Equity Objective	Protected Characteristic	Who	Measurable Success Indicator
Develop and embed a culture that encourages and values equity, diversity and inclusion across our workforce enabling all staff to achieve their very best.	Age Disability Gender reassignment Marriage/Civil Partnership Pregnancy/Maternity Ethnicity and race Religion or belief Sex Sexual orientation	CEO COO HT SLT SBO CoT CoG	<ul style="list-style-type: none"> • To undertake Trust wide training to support the strategic development of the approach to DEI. • To create a safe yet brave space to talk about Equity, Diversity and Inclusion • Staff, pupils and parents apply the following principles: <ul style="list-style-type: none"> ○ To provide an open, safe space for children, staff and parents to discuss DEI. ○ No judgement and it is a brave space to speak freely. ○ To acknowledge we all have sub-conscious bias and different cultural experiences. It is safe to speak up. ○ All have a responsibility to a part of the conversation - be brave and be a voice. ○ Recognise that certain topics may evoke certain emotions. ○ Call people out (choose to challenge) or call people in (support them to understand, with compassion and patience). • DEI survey indicates positive progression in staff feeling
To continue to review recruitment processes, representing the diversity of our Trust	Age Disability Gender reassignment Marriage/Civil Partnership Pregnancy/Maternity Ethnicity and race Religion or belief Sex Sexual orientation	CEO COO HT SLT SBO CoT CoG	<ul style="list-style-type: none"> • Recruitment to positively reflect the diversity of our school community • Enhance diversity on interview panels • Trustee/governor recruitment to positively reflect the diversity of our school community • Acknowledge potential unconscious bias in the recruitment process, prioritising the very best candidate for any role • Consideration given to positive recruitment to specific protected characteristics
To continue to review policies and procedures to ensure that they represent the diversity of our Trust and enable all staff to achieve their very best.	Age Disability Gender reassignment Marriage/Civil Partnership Pregnancy/Maternity Ethnicity and race Religion or belief Sex Sexual orientation	CEO COO HT SLT SBO CoT CoG	<ul style="list-style-type: none"> • Consideration to be given to all policies to ensure they support an inclusive culture which embraces belonging • Introduce a Flexible working policy.