

Equalities Policy

January 2026

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0. Document Control

The table below contains the changes made between the different final editions of this document set for approval. This is to help provide information to those reviewing and approving the document of the changes being made.

Document Edition	Section	Details of change
January 2025	3	Updated text
January 2024	3	Updated text
	4	Amended cycle of review Updated links to legislation and guidance documents
	4.1	Amended relevant internal documents
August 2022	All	Update to new brand

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1. Definitions

The “Trust” refers to the company known as the University Schools Trust, East London and all Trustees, Governors and Staff who work within it.

A “School” refers to an individual academy within the Trust, as denoted by their Unique Reference Number. As such a ‘school’ may span one or several phases of education to the individual academies within the Trust. Depending on the context the term “School” may refer to a singular academy or to all of the academies within the Trust but as separate entities.

“Staff” refers to any individual who is employed by the Trust or who operates on the Trust’s behalf, e.g. Trustees and Governors.

A “Parent” includes the natural or adoptive parent of a pupil as well as any non-parent / carer who has parental responsibility including being involved in the day to day care of a pupil.

A “Pupil” includes any incoming or current pupil at any School within the Trust. It also includes any individual who was previously a pupil at any School within the Trust and who has left within the appropriate timeframe for consideration as necessary, e.g. complaints. The term pupil is used as standard by the UST in its policy documents but can be replaced with the term “student” or “child” with no change of definition.

The “Headteacher” is defined as the individual who has ultimate responsibility for a school in line with UST strategy, approach, ethos and values. Individual schools may have alternative titles for this position such as Executive Headteacher or Principal.

2. Scope of the Policy

This policy applies to all members of the current and prospective school communities within UST.

3. Policy Aims and Ethos

We recognise the benefits of having a diverse school community, with individuals who value one another, and the different contributions everyone can make. We are committed to being an equal opportunities education provider and employer and are committed to equality of opportunity for all members of the Trust and school community.

The Trust Equality Policy is based on our values as expressed in our vision statement:

Guided by and working with our Trust Partners:

The Trust is a family of inclusive schools where collaborative partnerships deliver a transformational education which empowers our pupils and the communities they come from to realise their full potential. A culture of high expectations nurtures a drive to achieve excellence and to take ownership of future academic and vocational learning paths in order to equip our pupils as global citizens and inspire their communities.

We consider all learners and their parents/carers to be of equal value, irrespective of disability, ethnicity, gender, gender identity, pregnancy, religion/beliefs and sexual orientation.

We welcome our responsibility to foster a culture of respect for others within a caring, cohesive environment. All members of the Trust community are encouraged to develop positive relationships reflecting their status as members of a diverse global community. It is our duty to ensure that the aims and values outlined here apply to the full range of our policies and practices.

We aim to create a working environment in which all individuals can 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.

Students will be taught these values and to respect others. In the provision of equal opportunities, we recognise and accept our responsibilities under the law and oppose discrimination on the basis of:

- Age,
- Disability,
- Gender reassignment,
- Gender definition,
- Intersex and non-binary,
- Marital or civil partner status,
- Pregnancy and maternity,
- Race, colour, nationality, ethnic or national origin,
- Religion or belief,
- Sex or sexual orientation; or
- Any combination of those listed above (the protected characteristics).

These include the **Protected Characteristics**, in line with the Equality Act 2010. More detail can be found in Appendix 3.

We also oppose unlawful discrimination on the basis that a person has a special educational need or learning difficulty, or because English is an additional language.

We will ensure that all policies and practices conform with the principle of equal opportunities and comply with the Public Sector Equality Duty set out in the Equality Act 2010.

The Trust and its schools will meet its obligations under the public sector equality duty by having due regard to the need to:

- Eliminate discrimination and other conduct that is prohibited by the Equality Act 2010;
- Advance equality of opportunity between people who share a protected characteristic and people who do not share it;
- Foster good relations across all characteristics – between people who share a protected characteristic and people who do not share it.

Through the operation of this policy we aim to:

- Communicate the commitment of the Trust and each school to the promotion of equal opportunities;
- Promote equal treatment across the Trust and in each school for all members of the school community;
- Create and maintain an open and supportive environment which is free from discrimination.

4. Links to Legislation and Guidance Documents

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

The Trust Board is responsible for ensuring that the Trust/school complies with legislation, and that the equality scheme and its related procedures and action plans are implemented.

The Trust delegates' responsibility to the Local School Committee for ensuring and monitoring that individual schools are compliant with their responsibilities.

The Trust Board and the Local School Committee will keep aspects of the school's commitment to the Equality Duty under review, for example, in terms of standards, curriculum, admissions, exclusions, personnel issues and the school environment. The Trust will provide information on the organisation's compliance with the general duty every year and will ensure the school's evaluate their Equality objectives every four years.

The Trust will:

- publish information to demonstrate how we are complying with the Public Sector Equality Duty
- prepare and publish equality objectives.

Each school's equality information and objectives are published on the school website.

4.1. Relevant Internal Policies

This policy should be read in conjunction with the following policies;

- | | |
|---------------------------|---|
| • Accessibility Policy | • Performance Appraisal Framework |
| • Admissions Policy | • PHSE and SMSC Policy |
| • Anti-Bullying Policy | • Safer Recruitment Policy |
| • Behaviour Policy; | • SEND Policy |
| • Complaints Policy | • Teacher Appraisal and Capability Policy |
| • Disability Policy | • Whistleblowing Policy |
| • Flexible Working Policy | |

5. Roles and Responsibilities

The Trust/school will actively seek to:

- Promote equality of opportunity for all pupils, staff, parents and stakeholders
- Eliminate harassment and discrimination that is unlawful under the Equality Act 2010
- Promote positive attitudes towards all – This means not representing people in a demeaning way; not pretending they do not exist; and not representing them anywhere at all
- Encourage participation by disabled persons in public life - It is also important to respect the wishes of disabled children in an educational setting so that they do not feel pushed into activities they do not wish to take part in.
- Take steps to take account of disabled persons' disabilities, which may mean treating disabled persons more favourably than other persons in particular circumstances.

5.1. Trust Board

The Trust board will;

- approve Trust wide approach and relevant policies and practice

5.2. School Committee

The School Committee will;

- review and monitor school implementation of the Equality Policy

5.3. Headteacher

The headteacher will;

- prepare and deliver for school, informed by Trust strategy;
- deliver any recommendations from audits and reviews;
- has delegated day-to-day responsibility for operating the policy and ensuring its accessibility, availability, maintenance and review;
- maintain and monitor agreed Trust KPIs and statutory information in relation to equality legislation

5.4. All Staff

All staff will;

- ensure that they have read this policy and the associated documents;
- lead by example and to promote the aims and objectives of the Trust with regard to equal opportunities in light of the Public Sector Equality Duty.

6. Approval Signature

Signature of (enter position e.g. Chair) _____

Print name _____

Date _____

7. Appendix 1 – Key Members of Staff Referenced

Role	Current Member of Staff
Trust Leader	Gillian Kemp
Headteacher, Cyril Jackson Primary School	Hodo Dirir
Executive Headteacher, St Pauls Way Primary School and Sir William Burrough	Siobhan Fehim
Head of School, St Pauls Way Trust Secondary School	Firdusi Uddin
Executive Headteacher, St Paul's Way Trust School and Royal Greenwich Trust School	Cath Smith
Royal Greenwich Trust School	Asma Khan

8. Appendix 2 – Glossary

Discrimination may be direct or indirect, or arising from disability and it may occur intentionally or unintentionally. The examples presented below are intended to act as guidance to illustrate the type of event that is relevant to each area. They are not meant to represent an exhaustive list.

8.1. Direct discrimination

Direct discrimination occurs when someone is treated less favourably than another person because of a protected characteristic.

Direct discrimination could involve a decision not to employ someone, to dismiss them, withhold promotion or training, offer poorer terms and conditions or deny contractual benefits because of a protected characteristic.

Example: Not employing a woman because she is pregnant.

8.2. Discrimination by Perception

Discrimination by Perception is where an individual is directly discriminated against or harassed based on a perception that he/she has a particular protected characteristic when he/she does not, in fact, have that protected characteristic. Discrimination by perception does not apply, in law to marriage and civil partnership or pregnancy and maternity.

Example: A heterosexual employee is taunted about his sexuality by colleagues who perceive him to be gay.

8.3. Discrimination by Association

Discrimination by Association is discrimination against a person because they have an association with someone with a particular protected characteristic. Discrimination by Association applies to race, religion or belief, sexual orientation, age, disability, gender reassignment and sex.

Example: Not offering a job to the parent of a disabled child because the employer thinks they will need more time off due to the child's disability and there is no evidence to support this.

8.4. Indirect discrimination

Indirect discrimination is where a provision, criteria, policy or practice in the Trust is applied to everyone but particularly disadvantages people who share a protected characteristic compared with people who do not. Indirect discrimination can be justified if the Trust can show it acted reasonably, for example that it is a 'proportionate means of achieving a legitimate aim'.

Indirect discrimination applies to age, race, religion or belief, sex, sexual orientation, marriage and civil partnership, disability discrimination and gender reassignment. Pregnancy and maternity are covered by indirect sex discrimination.

Example: Having a policy not to employ anyone with facial hair in a kitchen for health and safety reasons. This policy may indirectly discriminate against certain religious groups.

8.5. Discrimination arising from disability

Discrimination arising from disability occurs when a person with a disability is treated unfavourably because of something connected with their disability and the treatment cannot be shown to be proportionate means of achieving a legitimate aim.

Example: 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.

8.6. Positive Action

Positive action describes measures targeted at a particular group that are intended to redress past discrimination or to offset the disadvantages arising from existing attitudes, behaviours and structures. The Trust may use lawful measures which can include:

- Encouraging applications from people of particular racial groups or gender, who have been under-represented in certain occupations or grades during the previous 12 months.
- Providing facilities to meet any specific educational, training, or welfare needs identified for a specific racial group.
- Measures to provide training and special encouragement for returnees to the Trust after a period of time discharging domestic or family responsibilities.

Positive action is different from positive discrimination which is illegal. Positive discrimination generally means choosing (or not choosing) someone solely on the grounds of a protected characteristic (e.g. gender or racial group) and not on their abilities.

8.7. Genuine Occupational Requirements

Employers can exercise the powers available under the Equality Act 2010 to appoint a person from a particular group, where there is a genuine occupational requirement.

An example of a genuine occupational requirement would be appointing a female to work in a shelter for female victims of domestic violence.

8.8. Harassment

Harassment can be defined as “improper, offensive and humiliating behaviour, practices or conduct, which may threaten a person’s job security, create an intimidating, unwelcoming and stressful workplace, or cause personal offence or injury.” (ACAS)

Harassment can often be identified by a series of what seem to be trivial incidents. It is the impression of the harassed person, not the intentions or motivations of the harasser, which are important.

Harassment applies to all protected characteristics except for pregnancy and maternity and marriage and civil partnership. Employees can complain of behaviour that they find offensive even if it is not directed at them, and the complainant need not possess the relevant characteristic themselves. Employees are also protected from harassment because of perception and association (see 7.1 above).

8.9. Victimisation

Victimisation is where an employee is subjected to a detriment, such as being denied a training opportunity or a promotion because he/she is suspected of, or has:

- made, or supported, a complaint of discrimination;
- raised a grievance;
- brought proceedings under the Equality Act 2010; or
- done any other thing for the purposes of, or in connection with, the Equality Act 2010.

An employee is not protected from victimisation if they have maliciously made or supported an untrue complaint.

8.10. Unconscious Bias

Unconscious bias occurs when people favour others who look like them and/ or share their values and we should be aware that everyone has an unconscious bias.

Where unconscious bias is against a protected characteristic, it can be unlawfully discriminatory. The Trust therefore aims to challenge stereotyping and prejudice openly and to mitigate this through:

- being aware of unconscious bias;
- not rushing to make decisions and considering issues fully;
- justifying decisions based on evidence and recording the reasons for decisions, e.g. recruitment, promotion and disciplinary outcomes;
- encouraging staff to work with diverse groups of people and getting to know them as individuals, such as working within different teams, premises, etc wherever possible;
- focusing on positive behaviour of people and not the negative stereotypes; and
- implementing Policies and Procedures which limit the influence of individual characteristics and preferences.

9. Appendix 3: The Protected Characteristics; examples

9.1. Age

The Equality Act 2010 protects people of all ages from unlawful discrimination.

9.1.1. Direct discrimination

Treating someone less favourably because of their actual or perceived age, or because of the age of someone with whom they associate.

For example, advertising for job applicants under 25 years old only. This treatment can only be justified if it is a proportionate means of achieving a legitimate aim.

9.1.2. Indirect discrimination

This can occur where there is a provision, criteria or practice which applies to all employees, but particularly disadvantages people of a particular age.

For example, a requirement for job applicants for a teaching post to have 5 years teaching experience may disadvantage younger people. Indirect discrimination can only be justified if it is a proportionate means of achieving a legitimate aim, e.g. if the Trust can demonstrate this level of experience is necessary to achieve the desired knowledge and skills.

9.2. Disability

Under the Equality Act 2010, a person is disabled if they have 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. These include things like using a telephone, reading a book or using public transport. Long term means that the impairment has lasted or is likely to last for at least 12 months or for the rest of the affected person's life. Substantial means more than minor or trivial. In most circumstances, a person will have the protected characteristic of disability if they have had a disability in the past, even if they no longer have the disability. Individuals who are HIV positive, have cancer or MS are automatically protected.

Employers must make reasonable adjustments in the recruitment and employment of disabled people. This can include, for example, adjustments to recruitment and selection procedures, to terms and conditions of employment, to working arrangements and physical changes to the premises or equipment. In assessing the reasonableness of the adjustment, the employer should consider:

- proportionality and impact of the adjustment on the role;
- the costs/financial support available;
- medical opinion from the employee's doctor and the occupational health advisor; and
- impact on the operational requirements of the MAT.

9.2.1. Direct discrimination

For example not offering a job because someone is a wheelchair user.

9.2.2. Indirect discrimination

This is where a provision, criterion or practice is applied that is discriminatory in relation to individuals who have a particular disability such that it would be to the detriment of people who share that particular disability compared with people who do not, and it cannot be shown to be a proportionate means of achieving a legitimate aim.

Discrimination arising from disability - occurs where an individual has been treated unfavourably because of something arising in consequence of a disability. There is no need for a comparator, and the reason for the unfavourable treatment is irrelevant.

For example, not considering a teacher for promotion as they have been diagnosed with depression without considering whether the condition would actually impact on their ability to do the job and if it would, whether reasonable adjustments could be made to negate that impact.

This type of discrimination is unlawful where the employer or other person acting for the employer knows or could reasonably be expected to know that the person has a disability.

There is an obligation on employers to make reasonable adjustments where a physical feature or a provision, criterion or practice puts a disabled person at a substantial disadvantage compared with someone who does not have the protected characteristic or disability. The duty to make reasonable adjustments aims to make sure that a disabled worker has the same access to everything that is involved in doing and keeping a job as a non-disabled person.

All the relevant individual circumstances must be considered when deciding what adjustments to make and the individual must be involved in discussions to ensure they are as effective as possible.

9.3. Sharing health and absence information

In accordance with the Equality Act 2010, employers may not request information concerning an individual's sickness and attendance record prior to the selection stage. Once the preferred candidate has been selected, then sickness and attendance records can be obtained from the referee and applicant, as part of the pre-employment checks prior to a firm offer. The applicant must give their explicit consent for this information to be released. The interview panel may not ask general questions about the individual's sickness and attendance record but may ask relevant questions to establish whether the applicant will be able to carry out a function that is intrinsic (e.g. majority of the work involves manual handling) to the work concerned once reasonable adjustments are in place.

9.4. Gender reassignment

Gender reassignment is a protected characteristic under the Equality Act 2010. This applies to people who are proposing to undergo, are undergoing, or have undergone a process (or part of a process) to reassign their gender by changing physiological or other attributes of sex. Gender reassignment is a personal process, that is moving away from one's birth sex to the preferred gender, rather than a medical process. The law does not require a person to undergo a medical procedure to be recognised under the protected characteristic of gender reassignment.

Protection is provided where, as part of the process of reassigning their gender, an individual lives in a gender identity, which is different to the gender they were assigned at birth, for at least two years. Throughout this period they are protected by the Equality Act 2010.

In order to be protected under the Equality Act 2010, there is no requirement for an employee to inform their employer of their gender reassignment status or their gender at birth. However, if an employee is proposing to undergo gender reassignment or is still in the process of transitioning, they may want to discuss their needs with their employer so the employer can support them during the process. Once a transgender person has received gender reassignment surgery and is fully living in the gender they identify with there is no requirement to inform an employer of their gender at birth.

9.4.1. Direct discrimination

This is treating someone less favourably than other employees because of their gender reassignment, whether actual or perceived, or because they associate with someone who intends to undergo, is undergoing or has undergone gender reassignment.

9.4.2. Indirect discrimination

For example, an employer starts an induction session for new staff with an ice-breaker designed to introduce everyone in the room to the others. Each employee is required to provide a picture of themselves as a toddler. One employee is a trans woman who does not wish her colleagues to know that she was brought up as a boy. When she does not bring in her photo, the employer criticises her in front of the group for not joining in.

It would be no defence that it did not occur to the employer that this employee may feel disadvantaged by the requirement to disclose such information. Indirect discrimination can only be justified if it is a proportionate means of achieving a legitimate aim.

9.5. Marriage and civil partnership

The Equality Act 2010 protects employees from discrimination on the grounds of being married or in a civil partnership.

Marriage covers any formal union of a man and woman which is legally recognised in the UK as a marriage. It also covers same sex couples who opt for a marriage. A civil partnership refers to a registered civil partnership under the Civil Partnership Equality Act 2010 2004, including those registered outside the UK. This is only open to same sex couples.

Only people who are married or in a civil partnership are protected against discrimination on this ground. The status of being unmarried or single is not protected. People who only intend to marry or form a civil partnership, or who have divorced or had their civil partnership dissolved, are not protected on this ground.

9.5.1. Direct Discrimination

This is where someone is treated less favourably than other employees on the grounds of them being married or in a civil partnership, actual or perceived, or because they are associated with a person who is married or in a civil partnership.

For example, this could be where an applicant for a job is treated less favourably because it is considered that they will not be as committed to the job as a single person because they have marital or partnership commitments.

9.5.2. Indirect Discrimination

This occurs if an employer has a policy or way of working that puts people who are married or in a civil partnership at a disadvantage.

9.6. Pregnancy and maternity

A woman is protected against discrimination on the grounds of pregnancy and maternity during the period of her pregnancy and any maternity leave to which she is entitled. During this protected period, pregnancy and maternity discrimination cannot be treated as sex discrimination.

9.6.1. Direct discrimination

Covers the unfavourable treatment of a woman, during the "protected period" in relation to her pregnancy or any illness suffered by her as a result of that pregnancy. Unfavourable treatment during the protected period because a woman is on compulsory maternity leave or she is exercising or seeking to exercise, or has exercised or sought to exercise, the right to ordinary or additional maternity leave, is also covered.

For example, an employee has been off work because of pregnancy complications since early in her pregnancy. Her employer has dismissed her in accordance with the sickness absence management policy. This policy is applied regardless of sex. The dismissal is unfavourable treatment because of her pregnancy and would be unlawful even if a man would be dismissed for a similar period of sickness absence, because the employer took into account the employer's pregnancy related sickness absence in deciding to dismiss.

Discrimination on the grounds of pregnancy/maternity can only be justified if it is a proportionate means of achieving a legitimate aim.

For example, it would be legitimate to dismiss a pregnant employee who had been found to have committed an act of gross misconduct as the reason for the dismissal was unconnected to the pregnancy.

9.7. Race

For the purposes of the Equality Act 2010, 'race' includes colour, nationality or ethnic or national origin. A person has the protected characteristic of race if they belong to a particular racial group. A racial group can be made up of two or more different racial groups (for example Black Britons).

9.7.1. Direct discrimination

Treating someone less favourably because of their actual. The less favourable treatment can also relate to the person's perceived race, even where the perception is wrong, or to the person's association with someone who has, or is perceived to have, the protected characteristic.

9.7.2. Indirect discrimination

This can occur where there is a provision, criterion or practice which applies to all employees, but particularly disadvantages people of a particular race.

For example, a requirement for all job applicants to have GCSE Maths and English. People educated in countries which don't have GCSEs would be discriminated against if equivalent qualifications were not accepted. Indirect discrimination can only be justified if it is a proportionate means of achieving a legitimate aim.

9.8. Religion or belief

In the Equality Act 2010, religion includes any form of religion which has a clear structure and belief system. It also includes a lack of religion - in other words employees or jobseekers are protected if they do not follow a certain religion or have no religion at all. Discrimination because of religion or belief can occur even where both the discriminator and recipient are of the same religion or belief.

Belief means any religious or philosophical belief and also covers non-belief. To be protected, a belief must satisfy various criteria, including that it is a weighty and substantial aspect of human life and behaviour. Denominations or sects within a religion can be considered a protected religion or religious belief. Political beliefs are not protected.

A belief need not include faith or worship of a God but must affect how a person lives their life or perceives the world. A belief which is not a religious belief may be a philosophical belief.

Examples of philosophical beliefs include Humanism and Atheism. For a philosophical belief to be protected under the Equality Act 2010:

- it must be genuinely held;
- it must be a belief and not an opinion or viewpoint based on the present state of information available;
- it must be a belief as to a weighty and substantial aspect of human life and behaviour;
- it must contain a certain level of cogency, seriousness, cohesion, and importance;
- it must be worthy of respect in a democratic society, not incompatible with human dignity and not conflict with the fundamental rights of others.

9.8.1. Direct discrimination

This is where, because of the protected characteristic of religion or belief, a person treats another person less favourably than that person treats or would treat other persons. The less favourable treatment can relate to the person's actual or perceived religion or belief, even where the perception is wrong, or to the person's association with someone who has, or is perceived to have, the protected characteristic.

9.8.2. Indirect discrimination

This can occur where there is a provision, criterion or practice which applies to all employees, but particularly disadvantages people of a particular religion or belief and which the employer cannot show to be a proportionate means of achieving a legitimate aim.

For example, an employer announces that staff cannot wear their hair in dreadlocks, even if the locks are tied back.

A policy amounts to a provision, criterion, or practice. The decision to introduce the policy could be indirectly discriminatory because of religion or belief, as it puts Rastafarian employees at a particular disadvantage. The employer must show that the provision, criterion, or practice can be objectively justified and is a proportionate means of achieving a legitimate aim.

9.9. Sex

A person's sex refers to the fact that they are male and female.

9.9.1. Direct discrimination

Treating someone less favourably because of their actual or perceived sex, or because of the sex of someone with whom they associate.

9.9.2. Indirect discrimination

This can occur where there is a provision, criterion or practice that applies to all employees, but particularly disadvantages employees of a particular sex.

For example, a requirement that job applicants must be six feet tall could be met by significantly fewer women than men.

9.10. Sexual orientation

Sexual orientation is a protected characteristic. It means a person's sexual orientation towards:

- persons of the same sex (i.e. the person is a gay man or a lesbian);
- persons of the opposite sex (i.e. the person is straight/heterosexual); or
- persons of either sex (i.e. the person is bisexual)

Sexual orientation relates to how people feel as well as to their actions. Sexual orientation discrimination includes discrimination because someone is of a particular sexual orientation and it also covers discrimination connected with manifestations of that sexual orientation. These may include someone's appearance, the places they visit or the people they associate with. It also includes a perception that someone has a particular sexual orientation based on their appearance, regardless of whether they do or do not.

9.10.1. Direct discrimination

Treating someone less favourably because of their actual or perceived sexual orientation, or because of the sexual orientation of someone with whom they associate.

9.10.2. Indirect discrimination

This can occur where there is a provision, criterion or practice which applies to all employees, but particularly disadvantages people of a particular sexual orientation and which the employer cannot show to be a proportionate means of achieving a legitimate aim.

For example, a particular family friendly policy that does not apply to same sex couples.

10. Appendix 4: Equality and Pay

10.1. Equal Pay

The Equality Act 2010 provides that men and women should receive equal pay for equal work. This means that in most circumstances a challenge to pay inequality and other contractual terms and conditions still has to be made by comparison with a real person of the opposite sex in the same employment. However, the Equality Act 2010 allows a claim of direct pay discrimination to be made, even if no actual comparator can be found. This means that a claimant who can show evidence that they would have received better remuneration from the Trust if they were of a different sex may have a claim, even if there is no-one of the opposite sex doing equal work with the Trust. This would be a claim under sex discrimination.

10.2. Pay Secrecy

The Trust will not prevent or restrict its employees from having discussions to establish if they believe pay differences exist that are related to a protected characteristic. The Trust may require its employees to keep pay rates confidential outside the workplace e.g. a competitor organisation.

10.3. Gender pay gap reporting

The gender pay gap reporting duty for public-sector employers in England is set out in the Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017 which came into force on 31 March 2017.

The Regulations include a requirement for public sector employers with 250 or more employees to publish:

- the difference in mean and median pay between male and female employees;
- the difference in mean and median bonus pay between male and female employees and the proportions of male and female employees who were paid bonus pay; and
- the proportions of male and female employees in each quartile of their pay distribution.

At their discretion, employers can also publish a supporting narrative and action plan to explain their gender pay gap. The snapshot date for gathering data each year is 31st March. Employers are required to publish their gender pay gap report within the period of 12 months (beginning with the snapshot date) on the GOV.UK website. Employers should also publish this information on their own website in an easily accessible format and in a prominent place. Once published the information must remain there for at least three years.

The Equality and Human Rights Commission is responsible for enforcing public sector equality duties including failure to comply with gender pay gap reporting duties.

11. Appendix 5: Supporting organisations and documentation

11.1. Equality and Human Rights Commission

The Equality and Human Rights Commission is the independent advocate for equality and human rights in Britain. It aims to reduce inequality, eliminate discrimination, strengthen good relations between people, and promote and protect human rights. It provides guidance for employers and education providers.

<https://www.equalityhumanrights.com/>

11.2. Department for Education Non-statutory Advice

Non-statutory Guidance is available from the Department for Education relating to the Equality Act 2010 in the following publication:

The Equality Act 2010 and schools. Departmental advice for school leaders, school staff, governing bodies and local authorities

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/315587/Equality_Act_Advice_Final.pdf

11.3. Other organisations offering support and information:

ACAS provides information, advice, training, conciliation and other services for employers and employees to help prevent or resolve workplace problems, include detailed guidance on Equality and Diversity at Work.

<http://www.acas.org.uk/index.aspx?articleid=1363>

Age - <http://www.ageuk.org.uk/>

Gender (sex) - <http://www.fawcettsociety.org.uk/>

Sexual orientation and gender identity - <http://www.stonewall.org.uk>

Disability

For more information on disability, you may be interested in looking at the following websites:

[ECL Sensory Team - www.eclsensoryservice.org](http://www.eclsensoryservice.org)

[Support4sight - www.support4sight.org.uk](http://www.support4sight.org.uk)

[Deafblind UK - www.deafblind.org.uk](http://www.deafblind.org.uk)

[Disability Rights UK - https://www.disabilityrightsuk.org](https://www.disabilityrightsuk.org)

[Scope - www.scope.org.uk](http://www.scope.org.uk)

[MIND - www.mind.org.uk](http://www.mind.org.uk)

Government Equalities Office - <https://www.gov.uk/government/organisations/government-equalities-office>

12. Appendix 6 - Equal Opportunities Education Provider

Admissions

Each school accepts applications from and admits students irrespective of their Protected Characteristics and will not discriminate on these grounds in the terms on which a place is offered. Every application will be treated in a fair, open-minded way. Each school's admissions policy reflects our approach towards equal opportunities and is consistent with this policy.

Equal access

Each school will afford all students equal access to all benefits, services, facilities, classes and subjects including all sports, irrespective of their Protected Characteristics, subject to considerations of safety and welfare as set out below.

Exclusions

We will not discriminate against any student by excluding him or her from school, or by subjecting him or her to any other detriment, on the grounds of his or her Protected Characteristics.

Teaching and school materials

Efforts are made to recognise and be aware of the possibility of bias (for example gender or racial), so that this can be eliminated in both teaching and learning materials and teaching styles. Materials are carefully selected for all areas of the curriculum so as to avoid stereotypes and bias.

Bullying

We will not tolerate bullying or cyberbullying for any reason. Specific types of bullying include:

- Bullying relating to race, religion, belief or culture;
- Bullying related to SEN, learning difficulties or disabilities;
- Bullying related to appearance or health conditions;
- Bullying relating to sexual orientation;
- Bullying of young carers or looked after children or related to home circumstances;
- Sexist or sexual bullying.

Each school's anti-bullying policy contains more details about the school's anti-bullying practices.

School Uniform

Each school's school uniform policy is consistent with this policy.

The same school uniform policy applies equally to all students, irrespective of their gender, gender reassignment, race, disability, sexual orientation, pregnancy or maternity, religion or belief or special educational needs, subject to considerations of safety and welfare.

However, we will consider reasonable requests to alter the school uniform, for example reasonable adjustments for children with a disability. The student or his or her parents should refer the matter to the Headteacher to ensure all reasonable adjustments are made to accommodate the student.

Students with SEN

Each schools' policy on special educational needs includes details about the welfare and educational provision for students with EHCPs.

13. Appendix 7: Equal Opportunities Employer

Employment

This policy applies to all aspects of employment from the advertisement of jobs, recruitment, terms and conditions of employment, career development, counselling, training, promotion, grievance and disciplinary procedures, through to reasons for termination of employment.

Applicants

We accept applications from, and recruit staff irrespective of their Protected Characteristics and will not discriminate on these grounds in the terms on which a position is offered. Every application will be treated in a fair, open-minded way. Our Safer Recruitment Policy reflects our approach towards equal opportunities and is consistent with this policy.

Equal access

We will afford all staff equal access to all benefits, services, facilities, and opportunities for development, irrespective of their Protected Characteristics, subject to considerations of safety and welfare as set out below.

Disabilities and reasonable adjustments

We have an ongoing duty to make reasonable adjustments for individuals with a disability in respect of both employment and the education and associated services provided to ensure that such staff and students are not placed at a substantial disadvantage in comparison with other staff and students. Reasonable adjustments may typically include:

- Making arrangements for an individual in a wheelchair to attend an interview in an accessible ground floor room;
- Allowing extra time for a child with dyslexia to complete an entrance exam;
- Providing examination papers in larger print for a child with a visual impairment;
- Rearranging the timetable to allow a student to attend a class in an accessible part of the building;
- Arranging a variety of accessible sports activities.

We are not legally required to make adjustments which include physical alterations such as the provision of a stair-lift or new ground floor facilities.

In making reasonable adjustments, we are required to provide auxiliary aids and services for students with a disability. We will carefully consider any proposals made by parents and will not unreasonably refuse any requests for such aids and services.

14. School and Trust Based Strategic Equalities Objectives

14.1. Cyril Jackson Primary School

Curriculum

Deliberate links are identified and included to ensure inclusion and equality are integral to the curriculum design and review.

Staff Development

To consider procedure and processes to track progression and succession planning of all staff, in all roles throughout the school.

14.2. Royal Greenwich Trust School

Curriculum

By January 2027, all curriculum areas will evidence meaningful representation of diverse voices, histories and experiences within schemes of learning, ensuring pupils see themselves reflected positively in what they learn.

Outcomes

Reduce disparities in attainment, attendance and behaviour outcomes between pupil groups by systematically identifying gaps and implementing targeted support and inclusive practice.

Student voice

Strengthen student voice so that pupils from all backgrounds feel heard, safe and valued, with clear systems for reporting, responding to and learning from incidents of discrimination or prejudice.

Staff development

Increase staff confidence and consistency in promoting equity, inclusion and anti-racism through structured CPD, shared language and clear school-wide expectations.

14.3. St Paul's Way Primary and Sir William Burrough Primary Schools

Curriculum

Sustain the development of our whole-school curriculum offer in light of subject developments, curriculum reviews, Equalities Actions and feedback from other stakeholders and advisors.

Continue to strengthen partnerships with primary curriculum leaders in other primary schools within the Trust and with secondary colleagues to provide a coherent curriculum from EYFS to Sixth Form

Participation

Continue to track participation of the co-curriculum offer, using this to adjust the strategic direction of co-curriculum and plan for additional opportunities for groups who are less engaged e.g. those with bespoke timetables, girls in sports in KS2, coding club etc.

Continue to engage in well-received co-curriculum projects, such as the Queen Mary identify project, and THEWs projects, to support children's development of character, independence, wellbeing and social skills etc.

To **sustain** Rights Respecting School approach to achieving the Gold Award

Tracking, Intervention and Outcomes

Develop the efficacy and impact of Pupil Progress Meetings as a tool to drive accelerated progress for all pupils

Implement the calendar of events to celebrate projects from both home and school and provide opportunities for parents to engage further in curriculum learning.

14.4. St Paul's Way Secondary School

Objective 1

To strengthen and standardise the follow-up process after a prejudicial incident, ensuring that every student who perpetrates a prejudicial incident receives a restorative and educational follow-up conversation.

Objective 2

To monitor and analyse subject choice data at key transition points to ensure students are empowered to make informed, aspirational and balanced choices, free from gender stereotyping or limitation.

Objective 3

To develop and embed high-quality PSHE resources and assemblies that promote understanding, inclusion and allyship in relation to LGBTQ+ identities.

14.5. UST

Leadership and Culture

To monitor, review and evaluate the Equalities Action Plans for each school

To ensure progress against the Equalities Action Plans

Staff Development and Well-Being

To review the professional development opportunities available to all staff across the Trust, addressing identified need within our schools.