

The Willows School Academy Trust



Equality & Diversity Policy

Review: January 2026

Next Review: January 2027

Introduction

The Willows School Academy Trust is committed to promoting equality of opportunity, valuing diversity and tackling discrimination in all its forms. We aim to equip children with an awareness of our diverse society and to appreciate the value of difference. This policy is based on the requirements of the Equality Act 2010 and associated statutory guidance.

Our commitment:

At The Willows School, every child and member of our school community matters and is valued, irrespective of their disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, or sexual orientation. For adult members of our community, this also includes age and marriage or civil partnership status. These are known as the 'protected characteristics' under the Equality Act 2010.

We will not tolerate discrimination, harassment or victimisation based on any protected characteristic. We are committed to:

- Eliminating discrimination and other conduct that is prohibited by the Equality Act 2010
- Advancing equality of opportunity between people who share a protected characteristic and people who do not share it
- Fostering good relations across all characteristics, between people who share a protected characteristic and people who do not share it

Equality in everything we do:

Every aspect of The Willows School activity has an equality dimension. This is expressed:

- Explicitly in our teaching materials, curriculum content and displays
- Implicitly in our classroom practice and teaching approaches
- Through the 'hidden curriculum' of social interaction amongst and between staff and pupils
- In our policies, procedures and decision-making processes

The Willows School's environment influences the developing attitudes of the children within it and can be a powerful vehicle for promoting understanding and practice of equality.

Our approach to inclusion:

We recognise that discrimination and prejudice can segregate and isolate people from their communities. The Willows School aims, through its proactive approach to inclusion, to ensure all children have equality of access to our school community and all the opportunities we provide.

We are particularly committed to:

- Making reasonable adjustments for pupils, staff and parents/carers with disabilities
- Addressing prejudices against disability and other protected characteristics in both children and adults
- Creating an environment where everyone feels valued, respected and able to achieve their full potential
- Ensuring our curriculum reflects and celebrates diversity
- Challenging stereotypes and promoting positive attitudes

This policy applies to all members of our school community: pupils, staff, governors, parents/carers and visitors.

Our School Context

The Willows School is situated in the London Borough of Hillingdon and serves a local catchment area within an approximately 1.7-mile radius of the school. As a small academy, we welcome students from many different primary schools and other local authorities.

Our school community:

Our school community is diverse and we are committed to meeting the needs of all our pupils. Our current pupil population includes:

- Students from a range of ethnic backgrounds, with the majority from white heritage backgrounds and an increasing percentage of students from minority ethnic groups
- Pupils with a range of special educational needs and disabilities
- Pupils eligible for pupil premium funding
- Pupils with English as an additional language

Pupil attainment on entry:

When students start at our school, their attainment is broadly below the national average, as evidenced by Key Stage 2 assessment data. This context informs our equality objectives and our commitment to ensuring all pupils, regardless of their starting points or protected characteristics, make strong progress and achieve their full potential.

How we use this information:

We use our understanding of our school context to:

- Identify any groups of pupils who may be at risk of underachievement or disadvantage
- Set appropriate and ambitious equality objectives
- Target resources and interventions effectively
- Monitor the impact of our equality work
- Ensure our curriculum and teaching approaches meet the needs of all our pupils
- Create an inclusive environment that celebrates the diversity of our community

We regularly review our pupil data by protected characteristics (including ethnicity, gender, disability, and disadvantage) to identify any gaps in attainment, progress, behaviour, attendance or participation, and take action to address these.

The Context of the policy

Legal framework:

The Equality Act 2010 replaced all previous equality legislation such as the Race Relations Act, Disability Discrimination Act and Sex Discrimination Act. It protects everyone in England and Wales, so it applies to all schools, regardless of type.

This policy is based on the following legislation and statutory guidance:

- The Equality Act 2010
- The Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017
- DfE guidance: 'The Equality Act 2010 and schools: Departmental advice' (non-statutory)
- Keeping Children Safe in Education (current version)
- Relationships Education, Relationships and Sex Education (RSE) and Health Education statutory guidance
- Special Educational Needs and Disability (SEND) Code of Practice: 0 to 25 years
- PSED (December 2023)

Links to other school policies:

This equality policy should be read in conjunction with our other policies, including:

- Accessibility Plan
- Admissions Policy
- Anti-Bullying Policy
- Behaviour Policy
- Complaints Policy
- Curriculum Policy
- Relationships and Sex Education (RSE) Policy
- Safeguarding and Child Protection Policy
- Special Educational Needs and Disability (SEND) Policy
- Staff Code of Conduct
- Staff Recruitment and Selection Policy
- Whistleblowing Policy

Our approach to equality underpins all aspects of school life and is reflected in all our policies and practices.

Scope of this policy:

This policy applies to:

- All pupils at The Willows School
- All staff (teaching and non-teaching)
- Governors and trustees
- Parents and carers
- Visitors to the school
- Third-party providers delivering services on our behalf

It covers all aspects of school life, including:

- Admissions
- Teaching and learning
- Curriculum content and delivery
- Assessment and pupil progress

- Behaviour management and exclusions
- Extra-curricular activities and school trips
- Staff recruitment, development and wellbeing
- Engagement with parents and the wider community

The Public Sector Equality Duty (PSED)

Under the Public Sector Equality Duty (PSED), sometimes known as the 'general duty', The Willows School is required to 'have 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

This means that whenever we are making a significant decision, or developing a policy, we must give thought to the implications it will have on equality.

Aim

The Willows School aims to foster a sense of community in which all pupils, staff, governors, parents/carers and visitors are valued, respected and can thrive, regardless of their:

- **Disability**
- **Gender reassignment**
- **Pregnancy and maternity**
- **Race**
- **Religion or belief** (including lack of religion or belief)
- **Sex**
- **Sexual orientation**

And, in the case of adult members of the school community:

- **Age**
- **Marriage or civil partnership status**

These are called the protected characteristics under the Equality Act 2010.

Our commitment to eliminating discrimination:

We will not tolerate discrimination, harassment or victimisation based on any protected characteristic. This includes, but is not limited to:

- Racism and racial harassment
- Sexism and sexual harassment
- Homophobic, biphobic or transphobic bullying or language
- Negative attitudes towards disability or discrimination arising from disability
- Discrimination based on religion or belief
- Discrimination based on pregnancy and maternity
- Any other discriminatory practices

How we respond to breaches of this policy:

Any breach of this policy will be taken seriously and dealt with promptly by the appropriate member of staff.

For pupils:

- Incidents will be addressed in line with our behaviour management policy and anti-bullying policy
- Parents/carers will be informed of serious incidents
- Restorative approaches will be used to prevent recurrence

For staff:

- Incidents will be addressed in line with our staff disciplinary procedure and code of conduct
- Serious breaches may result in disciplinary action, up to and including dismissal

- Support will be provided to staff who experience discrimination, harassment or victimisation

For parents/carers, visitors and third parties:

- Incidents will be addressed through our complaints policy
- We reserve the right to ban individuals from the school premises if their behaviour breaches this policy

Our specific commitments:

Under the Public Sector Equality Duty, we are committed to:

1. **Eliminating** discrimination, harassment, victimisation and any other conduct that is prohibited by the Equality Act 2010
2. **Advancing** equality of opportunity between people who share a protected characteristic and people who do not share it
3. **Fostering** good relations across all characteristics, between people who share a protected characteristic and people who do not share it

These commitments inform everything we do, from our day-to-day interactions to our strategic planning and decision-making.

Our Approach to Promoting Equality

Our objectives:

We aim to:

- Encourage pupils to be open-minded, challenge prejudice and develop respect for all people
- Help pupils to develop their self-esteem and recognise that they are each valued as individuals
- Demonstrate that pupils are respected as individuals with their own abilities, beliefs, challenges, attitudes, backgrounds and experiences
- Help each pupil to achieve their full potential, regardless of their protected characteristics
- Enable pupils to contribute actively to their education by bringing their cultural experiences, values and perspectives to it
- Be sensitive about equality issues in the selection of teaching materials and be aware of images and text which may stereotype or denigrate groups or individuals
- Ensure that The Willows School is an equal opportunities employer so that staff feel valued, supported and have appropriate advice and encouragement for professional development
- Use our resources effectively to help those who need additional support to overcome barriers
- Comply with our duties under the Equality Act 2010, including the Public Sector Equality Duty

How we achieve this:

We achieve these objectives by:

- Treating all members of the whole school community (pupils, staff, governors, parents/carers and visitors) as individuals with their own particular abilities, beliefs, challenges, attitudes, backgrounds and experiences
- Creating a school ethos which promotes equality, develops understanding and challenges myths, stereotypes, misconceptions and prejudices
- Encouraging everyone within our school community to gain a positive self-image and high self-esteem
- Having high expectations of everyone involved with the school
- Promoting mutual respect and valuing others' similarities and differences, and addressing equality issues openly and honestly
- Identifying and removing all practices, procedures and customs which are discriminatory and replacing them with practices which are fair to all
- Monitoring and reviewing our policies, practices and outcomes to secure continuous improvement
- Ensuring that equality considerations are embedded in all decision-making processes

Our Commitments Regarding Protected Characteristics

Sex:

- All pupils have equal access to all activities, opportunities and services offered at The Willows
- Teaching and support staff are aware that gender stereotyping may influence their expectations and attitudes, and actively work to challenge this
- Our teaching ethos and curriculum organisation actively encourage pupils to make choices based on their interests and preferences, not gender stereotypes

- Staff act as positive role models, challenging sexist language and behaviour
- We address everyday sexism and misogyny and take positive action to build a culture where these are not tolerated
- We ensure that pupils understand that sexual violence and sexual harassment are never acceptable and are not an inevitable part of growing up
- We promote positive conceptions of both masculinity and femininity
- We ensure both boys and girls have opportunities to practise respectful communication and understand experiences which are different from their own

Disability:

- Pupils are encouraged to develop awareness and understanding of disability, which is promoted throughout the curriculum
- All staff are aware of the specific individual needs of pupils with disabilities and provide appropriate support
- We make reasonable adjustments for pupils, staff and parents/carers with disabilities
- School access is appropriate for all pupils, staff and visitors
- We implement and regularly review our Accessibility Plan
- We recognise that pupils with SEND may be more vulnerable to harmful behaviour and ensure RSHE is particularly effective for these pupils
- We do not tolerate discrimination arising from disability
- We treat pupils with disabilities more favourably where necessary to ensure equal access and opportunity

Race:

The Equality Act 2010 defines racial discrimination as discrimination on the grounds of colour, race, nationality, ethnic or national origins.

- We will not tolerate racism in any form
- We promote race equality and oppose racism in all its forms
- We foster positive attitudes and commitment to an education for equality
- Appropriate action will be taken in line with our Behaviour Management and Anti-Bullying policies in dealing with any incident of physical or verbal threats, abuse or harassment related to race
- We record and monitor all incidents of racism and racial harassment
- We celebrate diversity and ensure our curriculum reflects the diverse nature of our society
- We challenge racial stereotypes in teaching materials and resources
- We value the cultural experiences and perspectives that pupils from all ethnic backgrounds bring to our school

Religion or belief:

- We acknowledge that members of the school community come from diverse backgrounds: some have no religious faith; others are committed to a greater or lesser extent to a variety of religions
- We promote an ethos of tolerance based on understanding of and respect for the beliefs and practices of others
- We will not tolerate discrimination, harassment or bullying based on religion or belief (or lack of religion or belief)
- With regard to the teaching of RE, we consider that the role of the teacher is that of educator and not evangelist. We do not seek to make pupils religious, but to teach them about religion
- We respect the right of parents to withdraw their children from RE lessons
- We make provision for pupils to take time off for religious observance through authorised absence
- We ensure our curriculum is sensitive to the religious backgrounds of all pupils

Sexual orientation:

- We will not tolerate homophobic, biphobic or transphobic language, bullying or discrimination
- We promote understanding and respect for people of all sexual orientations
- We ensure that same-sex relationships are represented in our teaching about families and relationships
- At secondary level, we ensure equal opportunity to explore the features of stable and healthy same-sex relationships, integrated into our RSHE programme
- We challenge stereotypes and promote positive attitudes
- Staff act as role models in challenging homophobic language and behaviour

Gender reassignment:

- We will not tolerate discrimination, harassment or bullying of transgender pupils or staff
- We treat transgender people with respect and dignity
- We are aware of the April 2025 Supreme Court ruling on the legal definition of sex and gender reassignment, and await further guidance from the EHRC
- We teach pupils the facts and the law about biological sex and gender reassignment
- We recognise that there is significant debate beyond the facts and the law, and we are careful not to endorse any particular view or teach it as fact

- We make reasonable adjustments where appropriate to support transgender pupils and staff

Pregnancy and maternity:

- We will not tolerate discrimination against pupils or staff who are pregnant or on maternity leave
- We make reasonable adjustments to support pregnant pupils to continue their education
- We work with pregnant pupils and their families to ensure appropriate support and planning
- We ensure pregnant pupils and new mothers are not disadvantaged in their education

Age (adults only):

- We will not tolerate age discrimination in employment
- We value the contributions of staff of all ages
- We ensure our recruitment and professional development practices are fair to staff of all ages

Marriage and civil partnership (adults only):

- We will not tolerate discrimination against staff based on their marital or civil partnership status
- We ensure equal treatment in employment for all staff regardless of marital status

Vulnerable groups:

We recognise that some pupils may be particularly vulnerable due to circumstances beyond the protected characteristics, including:

- Children in care (looked after children)
- Children with a social worker
- Young carers
- Pupils eligible for pupil premium
- Pupils with English as an additional language

For these pupils:

- All pupils have equal access to activities, opportunities and services offered at The Willows
- Teaching staff are aware of how vulnerability may influence their expectations and attitudes and adjust their approach accordingly
- We provide additional support where needed to overcome barriers
- We monitor the progress and wellbeing of vulnerable groups and take action to address any disadvantage

Promoting Inclusion

The Ethos of the School

- This policy reflects the ethos of the school and is linked to all our policies, particularly our behaviour, safeguarding, anti-bullying, SEND, accessibility, admissions, curriculum, and RSHE policies
- Steps are taken to ensure that everyone associated with the school is kept informed about this equality policy and abides by it, including through staff training, governor briefings, communication with parents/carers, and age-appropriate teaching for pupils
- All policies and procedures are regularly reviewed to ensure they promote equality and do not discriminate against any group
- Equality considerations are embedded in all decision-making processes
- We actively promote a culture of respect, tolerance and celebration of diversity

Pupil Achievement and Progress

Monitoring and analysis:

- Pupils' attainment and progress in all subjects are monitored by protected characteristics including ethnicity, sex, SEND, disadvantage (pupil premium eligibility), and English as an additional language (EAL)
- We analyse data on behaviour, attendance, exclusions, and participation in extra-curricular activities by protected characteristics
- Assessment outcomes are used to identify the specific needs of all pupils and inform policies, planning and the allocation of resources

Taking action:

- The school develops and implements targeted strategies for tackling any differences in the attainment, progress, behaviour or attendance of groups
- We set ambitious targets for all groups and hold high expectations of every pupil
- The school values and celebrates the achievements and progress of pupils from all groups

- All pupils have equal access to extra-curricular activities, and we monitor participation to ensure no group is underrepresented
- Pupils are offered the support and guidance they need to achieve their full potential, including additional interventions where appropriate
- We use pupil premium funding strategically to support disadvantaged pupils

Challenging discrimination:

- Staff challenge racism, sexism, homophobia, transphobia, and all forms of stereotyping
- Staff promote equality in education, and support pupils in making choices about their future education, employment and training free from stereotyping
- Steps are taken to ensure that pupils on work experience are not subjected to discrimination or harassment, including briefing employers on our expectations

Curriculum, Teaching and Learning

An inclusive curriculum:

- This school promotes an inclusive curriculum which reflects the diverse nature of our society
- Diversity is promoted and discrimination is challenged throughout the curriculum
- Curriculum planning takes account of the needs of all pupils, including those with SEND, EAL, and from different ethnic, cultural and religious backgrounds
- We ensure our curriculum includes positive representation of all protected characteristics
- We teach pupils about protected characteristics, equality, and the importance of respect and tolerance

Quality of teaching:

- Subject leaders provide guidance and examples of good practice for colleagues on inclusive teaching
- The school monitors and evaluates its effectiveness in providing an appropriate curriculum for all pupils
- Teaching methods and styles take account of the diverse needs of our pupils and encourage positive attitudes to difference, cultural diversity and equality
- Teachers use a range of teaching strategies to ensure all pupils can access learning
- We avoid teaching approaches that may disadvantage particular groups

Grouping and assessment:

- The allocation of pupils to teaching groups and optional subjects is fair and equitable to pupils from all groups, based on educational need rather than stereotypes or assumptions
- We monitor the composition of teaching groups to ensure no group is over or underrepresented
- Assessment is fair, unbiased and accessible to all pupils
- We make reasonable adjustments to assessment arrangements for pupils with disabilities where appropriate

Resources:

- The school takes active steps to ensure that resources in all areas of the curriculum are inclusive, represent diversity positively, and do not perpetuate stereotypes
- We are sensitive about equality issues in the selection of teaching materials and are aware of images and text which may stereotype or denigrate groups or individuals
- We regularly audit our resources to identify and remove any that are discriminatory

Pupils with English as an Additional Language (EAL)

- The school recognises and values multilingualism as an asset
- The language and learning needs of pupils with EAL are identified through appropriate assessment
- Appropriate support is provided to enable pupils with EAL to access the curriculum and make good progress
- We celebrate the linguistic diversity of our school community
- We ensure that pupils with EAL are not disadvantaged in assessment or grouping decisions

Parents, Governors and Community Partnership

Engaging with parents/carers:

- All parents and carers are welcome and respected in school, regardless of their protected characteristics
- We make reasonable adjustments to ensure parents/carers with disabilities can access school events and communications
- All parents are regularly informed of their child's progress through reports, parents' evenings and other communications
- We provide information in accessible formats where needed, including translation services for parents with EAL
- Steps are taken to involve parents from all backgrounds in the life of the school, including those from minority ethnic communities
- We consult with parents on this equality policy and our RSHE policy

Governance:

- People from all backgrounds, including minority ethnic communities and those with disabilities, are able to become school governors
- We actively encourage applications from underrepresented groups to join our governing body
- Governors are encouraged to play an active role in the life of the school in order to fulfil their monitoring duties, including monitoring the implementation of this equality policy
- The school supports all governors in performing their role, for example through induction procedures for new governors and ongoing training

Pupil Behaviour, Discipline and Exclusion

- The school's procedures for managing behaviour and disciplining pupils are fair and applied equally to all pupils, irrespective of any protected characteristic
- We monitor behaviour data, sanctions and exclusions by protected characteristics to identify any disproportionate impact on particular groups
- Where we identify disproportionate impact, we take action to address the underlying causes
- The process of excluding a pupil is fair and equitable to all pupils, and we consider any SEND or other needs that may have contributed to the behaviour
- Strategies to reintegrate long-term absentees and excluded pupils address the needs of pupils from all groups
- We do not tolerate discriminatory language or behaviour, and this is clearly set out in our behaviour policy
- Incidents of racism, sexual harassment, homophobic language, and other forms of discrimination are recorded, monitored and addressed

Recording and Responding to Discrimination**Incidents we record:**

We have established procedures for dealing with and recording incidents of:

- Racism and racial harassment
- Sexual harassment and sexist language
- Homophobic, biphobic and transphobic language or bullying
- Disability discrimination or bullying
- Discrimination or harassment based on religion or belief
- Any other discrimination related to protected characteristics

Admissions and Attendance**Admissions:**

- This school takes active steps to ensure that the admission process is fair and equitable to pupils from all groups, in line with our funding agreement and the School Admissions Code
- We do not discriminate against applicants based on any protected characteristic (subject to the permitted exceptions for schools with a religious character)
- Our admissions policy is clear, transparent and applied fairly to all applicants

Attendance:

- The school monitors pupils' attendance for all groups and uses the data to develop strategies to address poor attendance
- Where we identify that particular groups have lower attendance, we investigate the causes and take action
- Provision is made for pupils to take time off for religious observance through authorised absence
- We work with families to overcome barriers to attendance, including making reasonable adjustments where needed

Staff Recruitment and Career Development**Recruitment:**

- Recruitment and selection procedures are consistent with the Equality Act 2010 and promote equality of opportunity
- The headteacher ensures that in recruitment procedures, all advertisements, shortlisting and interview procedures are free from any direct or indirect discrimination
- In staff appointments, the best candidate is appointed based upon professional criteria as laid down in the job description and person specification
- Applications from people of all backgrounds are welcomed at all levels in school
- We actively encourage applications from underrepresented groups
- The recruitment and selection process is monitored to ensure that discrimination is not taking place
- Interview panels are diverse where possible

- We make reasonable adjustments to our recruitment process for candidates with disabilities

Employment practices:

- During employment it is unlawful to discriminate in the way opportunities for promotion, transfer or training are offered, and we ensure our practices are fair
- The school monitors the employment and professional development of staff by protected characteristics including ethnicity, sex, disability and age
- Proactive steps are taken to identify, support and provide opportunities for the professional development of staff from all groups
- We ensure equal access to professional development opportunities
- Performance management and appraisal processes are fair and free from bias

Other employment matters:

- It is unlawful to discriminate in dismissals, particularly in redundancy dismissals, and the school ensures that redundancy policies avoid any form of discrimination
- We take reasonable steps to prevent sexual harassment of staff (as required by the Equality Act 2010 from October 2024)
- Staff wellbeing and support is available to all staff equally
- We have clear procedures for staff to report discrimination, harassment or victimisation, including through our whistleblowing policy

Monitoring:

- We monitor staff recruitment, retention, progression and professional development by protected characteristics
- We analyse this data to identify any barriers or inequalities and take action to address them
- We report on workforce diversity to governors annually

Our Equality Objectives

The Willows School has identified the following equality objectives based on our monitoring data and school context. These objectives will be reviewed annually and updated as needed.

Objective 1: Close attainment gaps for pupils with protected characteristics

- **What we will do:** Analyse pupil achievement data by ethnicity, gender, SEND, and pupil premium eligibility to identify any gaps in attainment and progress
- **Actions:**
 - Termly data analysis by the Senior Leadership Team
 - Targeted interventions for identified groups
 - Monitor the impact of interventions through half-termly progress reviews
- **Success criteria:** Reduce any identified gaps in attainment by July 2027

Objective 2: Increase diversity in staff recruitment and retention

- **What we will do:** Monitor recruitment processes and staff retention by protected characteristics to ensure fair and equitable practices
- **Actions:**
 - Review all job advertisements and person specifications to remove potential bias
 - Ensure diverse interview panels where possible
 - Track applicant and appointment data by protected characteristics
 - Conduct exit interviews to understand reasons for staff leaving
- **Success criteria:** Achieve a more diverse staff body that better reflects our local community

Objective 3: Enhance accessibility for pupils, parents/carers, and visitors with disabilities

- **What we will do:** Review our physical environment and communication methods to identify and remove barriers for people with disabilities
- **Actions:**
 - Conduct an accessibility audit of school premises
 - Review and update our accessibility plan
 - Provide accessible formats for key communications to parents/carers
 - Ensure all school events consider the needs of people with disabilities

- **Success criteria:** 90% of parents/carers report that they can access school events and communications

Objective 4: Promote understanding and respect for all protected characteristics

- **What we will do:** Embed equality and diversity throughout our curriculum and school culture
- **Actions:**
 - Review curriculum materials to ensure they represent diverse backgrounds and challenge stereotypes
 - Deliver staff training on equality and unconscious bias
 - Celebrate diversity through assemblies, displays, and special events
 - Monitor and respond to incidents of discrimination, harassment, or bullying
- **Success criteria:** Reduction in reported incidents of discrimination; positive feedback from pupil and parent surveys about the inclusive culture of the school

Protection from Sexual Harassment for Staff

Employers must take 'reasonable steps' to prevent sexual harassment against staff. This is a requirement added to section 40 of the Equality Act in October 2024.

Our commitment:

The Willows School is committed to providing a working environment free from sexual harassment. We will not tolerate sexual harassment of any member of our school community.

What constitutes sexual harassment:

Sexual harassment occurs when a person is subjected to unwanted conduct which is of a sexual nature. The conduct doesn't need to be sexually motivated, only sexual in nature. This could be:

- Sexual comments or jokes
- Unwelcome touching, hugging or kissing

Reasonable steps we will take:

1. **Clear policies:** This equality policy, alongside our staff code of conduct and safeguarding policy, clearly states that sexual harassment is unacceptable
2. **Staff training:** All staff will receive regular training on:
 - What constitutes sexual harassment
 - How to report concerns
 - Their responsibilities under the Equality Act 2010
 - Creating a respectful workplace culture
3. **Reporting mechanisms:** We have clear procedures for staff to report sexual harassment.
4. **Risk assessment:** We will regularly assess risks of sexual harassment occurring and take preventative action
5. **Swift action:** All reports of sexual harassment will be taken seriously and investigated promptly in accordance with our disciplinary procedures
6. **Support for victims:** We will provide appropriate support to anyone who experiences sexual harassment
7. **Monitoring and review:** We will monitor reports of sexual harassment and review our preventative measures annually

Any member of staff found to have sexually harassed another person will face disciplinary action, which may include dismissal.

Types of Unlawful Behaviour Under the Equality Act

The Willows School will not tolerate any form of unlawful discrimination. All members of our school community should understand what unlawful behaviour looks like:

Direct discrimination

This is intentionally treating someone less favourably due to a protected characteristic. For example, refusing to make reasonable adjustments for a pupil with special educational needs.

Indirect discrimination

This is where a policy or practice, though applied equally to all pupils, has a disproportionate impact on a group of pupils sharing a protected characteristic. For example, a court found that a school's uniform policy that banned long hair was discriminatory against Rastafarian boys.

Harassment

The legal definition of harassment is: 'Unwanted conduct, related to a relevant protected characteristic, which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person.'

It's important to point out that under the legal definition, harassment only covers disability, race, sex or pregnancy and maternity, and not religion or belief, sexual orientation or gender reassignment. Harassing pupils with these characteristics would be considered direct discrimination, rather than harassment.

Sexual harassment

This occurs when a person is subjected to unwanted conduct which is of a sexual nature. The conduct doesn't need to be sexually motivated, only sexual in nature. This could be:

- Sexual comments or jokes
- Unwelcome touching, hugging or kissing

Victimisation

It's unlawful to retaliate against someone for taking action under the Act. The Equality and Human Rights Commission (EHRC) defines 'protected acts' as:

- Claiming, or complaining of, discrimination under the Act
- Giving evidence in someone else's claims under the Act
- Claiming someone has violated the Act
- Taking any other action under the Act

Roles and Responsibilities

Everyone in our school community has a responsibility to promote equality and challenge discrimination. This section sets out the specific responsibilities of different groups.

The Governing Body

The Governing Body has overall responsibility for ensuring the school meets its duties under the Equality Act 2010. Specifically, governors will:

- Agree and adopt this equality policy and review it annually
- Ensure the school complies with the Public Sector Equality Duty
- Receive and scrutinise termly progress reports from the headteacher on equality matters.
- Ensure equality considerations are embedded in all governing body decisions, including budget setting, policy approval, and strategic planning
- Ensure the school publishes required equality information and objectives
- Monitor the impact of the school's equality work through data analysis, school visits, and engagement with the school community
- Ensure appropriate resources are allocated to implement this policy effectively

The Headteacher

The headteacher has day-to-day responsibility for implementing this policy and will:

- Demonstrate through personal leadership the importance of this policy, modelling inclusive behaviour and language
- Ensure all staff are aware of the policy and understand their roles and responsibilities in relation to it
- Ensure this policy is implemented consistently across the school
- Monitor the impact of this policy through regular review of data and practice
- Lead the development and implementation of the school's equality objectives
- Ensure that equality considerations are embedded in all school decisions and policies
- Allocate appropriate resources, including staff time, to implement this policy effectively
- Where additional funding is available for raising the achievement of specific groups of pupils (e.g., pupil premium), ensure that the resources are used appropriately for this purpose and targeted on the basis of identified needs
- Report termly to the governing body on equality matters, including progress towards objectives and any concerns

- Ensure staff receive appropriate training on equality and diversity
- Take swift and appropriate action in response to incidents of discrimination, harassment or victimisation
- Ensure the school meets its legal duties, including publishing equality information and objectives
- Work with the designated governor for equality to monitor and review the policy
- Promote positive attitudes to diversity throughout the school community
- Ensure the school's culture is one where discrimination is not tolerated

Senior Leadership Team

Members of the senior leadership team will:

- Support the headteacher in implementing this policy
- Lead by example in promoting equality and challenging discrimination
- Ensure equality is embedded in their areas of responsibility (e.g., curriculum, behaviour, safeguarding)
- Monitor data relating to their areas of responsibility by protected characteristics
- Identify and address any inequalities or gaps in their areas
- Support staff in implementing the policy
- Contribute to termly reports to governors on equality matters

All Teaching and Support Staff

All teachers and support staff are responsible for promoting equality in their day-to-day practice and will:

- Familiarise themselves with this policy and understand their responsibility to implement it
- Understand the implications of the policy for their planning, teaching and learning strategies
- Plan and deliver an inclusive curriculum that reflects diversity and challenges stereotypes
- Use teaching methods and resources that are inclusive and accessible to all pupils
- Have high expectations of all pupils, regardless of their protected characteristics
- Challenge discriminatory language, behaviour and stereotypes
- Address equality issues in their subject area and promote positive attitudes to diversity
- Monitor the progress and participation of pupils in their classes by protected characteristics and take action to address any gaps
- Make reasonable adjustments for pupils with disabilities
- Support pupils with EAL to access the curriculum
- Create an inclusive classroom environment where all pupils feel valued and able to participate
- Deal with incidents of discrimination, harassment or bullying in line with school policies
- Record and report incidents of discrimination to the appropriate person
- Attend training on equality and diversity
- Model inclusive behaviour and language
- Ensure that grouping, seating arrangements and selection for activities are fair and equitable

Pupils

Pupils have a responsibility to contribute to a positive and inclusive school environment. Pupils will:

- Be made aware of this policy and how it applies to them, through age-appropriate teaching in PSHE, assemblies and other opportunities
- Learn to treat each other with respect, regardless of differences
- Learn about protected characteristics and the importance of equality
- Challenge discrimination, stereotypes and prejudice
- Report incidents of discrimination, harassment or bullying to an appropriate adult
- Support peers who experience discrimination
- Contribute to the development of an inclusive school culture
- Participate in discussions about equality and diversity
- Respect the school's expectations regarding behaviour and language

Parents and Carers

Parents and carers play an important role in promoting equality and will be encouraged to:

- Support the school's commitment to equality and inclusion
- Familiarise themselves with this policy
- Model inclusive behaviour and language
- Challenge their own and their children's stereotypes and prejudices
- Support their children to treat others with respect

- Engage with the school's RSHE curriculum, which teaches about protected characteristics and equality
- Report any concerns about discrimination to the school
- Work in partnership with the school to address any incidents involving their child
- Attend school events and engage with the school community
- Contribute to consultations on equality matters

Visitors and Third-Party Providers

Anyone visiting the school or providing services on behalf of the school must:

- Comply with this equality policy
- Treat all members of the school community with respect
- Not discriminate against, harass or victimise anyone based on a protected characteristic
- Challenge discriminatory behaviour if they witness it
- Report any concerns about discrimination to school staff

The school reserves the right to refuse access to anyone who breaches this policy.

Reasonable Adjustments

Our duty to make reasonable adjustments

Disability is a 'protected characteristic' under the Equality Act 2010 and we can't legally discriminate against people with that characteristic. As part of this, we must make 'reasonable adjustments' to minimise disadvantages to pupils, staff and parents/carers with disabilities. If an adjustment is reasonable, we must make it.

What is a disability?

A person has a disability if:

- They have a physical or mental impairment, and
- The impairment has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities

According to the Special Educational Needs and Disability (SEND) Code of Practice:

- 'Substantial' is defined as 'more than minor or trivial'
- 'Long-term' is defined as 'a year or more'

Reasonable adjustments for pupils

We have a duty to make 'reasonable adjustments' for pupils with disabilities. Where something our school does places a pupil with disabilities at a disadvantage compared to other pupils, we must take reasonable steps to try to avoid that disadvantage.

All pupils should be able to attend trips linked to the school curriculum and not be disadvantaged because of their disability. We will look at our offer of school trips to make sure all pupils are able to attend, and make reasonable adjustments where necessary.

Reasonable adjustments for staff

Our school has a duty as an employer to make reasonable adjustments for members of staff with a health condition or disability that puts them at a disadvantage in the workplace. This may include adjustments such as:

- Changing working hours
- Providing special pieces of equipment
- Changes to our interview process or the way we approach recruitment

Reasonable adjustments for parents/carers

At public events such as parents' evenings, school plays or award ceremonies, the school acts as a service provider for parents/carers. If we find there are barriers to people with disabilities in the way our school does things, we must consider making adjustments, and then make them if they're reasonable.

Monitoring the implementation and effectiveness of this equality policy is essential to ensure we are meeting our duties under the Equality Act 2010 and making continuous progress towards our equality objectives. We monitor and evaluate our equality work in the following ways:

Monitoring Discrimination Incidents

What we monitor:

- All reports of discrimination, harassment and victimisation are logged, including incidents relating to:
 - Racism and racial harassment
 - Sexism and sexual harassment
 - Homophobic, biphobic and transphobic language or bullying
 - Disability discrimination or bullying
 - Discrimination based on religion or belief
 - Any other discrimination related to protected characteristics

How we use this data:

- Incidents are analysed termly to identify patterns and trends
- We identify whether particular groups are disproportionately affected
- We identify whether incidents occur in particular locations, times or contexts
- Analysis informs targeted interventions and preventative work
- Data is reported to the senior leadership team and governing body termly
- We evaluate the effectiveness of our responses to incidents
- Serious or persistent incidents trigger a review of relevant policies and practices

Monitoring Pupil Outcomes

What we monitor:

We analyse pupil data by the following protected characteristics and other relevant groups:

- Ethnicity
- Sex (gender)
- SEND (special educational needs and disabilities)
- Disadvantage (pupil premium eligibility)
- Children in care (looked after children)
- English as an additional language (EAL)
- Where numbers allow, other protected characteristics

Data we analyse includes:

- Attainment in all subjects at key assessment points
- Progress from starting points
- Attendance and persistent absence
- Behaviour incidents and sanctions
- Exclusions (fixed-term and permanent)
- Participation in extra-curricular activities
- Pupil voice and wellbeing surveys

How we use this data:

- Identify any gaps in attainment, progress or outcomes between different groups
- Set targets for closing gaps and raising achievement for all groups
- Inform intervention strategies and resource allocation
- Evaluate the impact of interventions, including pupil premium spending
- Inform curriculum planning and teaching approaches
- Report to governors termly on progress and any areas of concern
- Inform our equality objectives

Monitoring Staff Recruitment and Employment

What we monitor:

We monitor recruitment and employment data by protected characteristics including:

- Ethnicity
- Sex (gender)

- Disability
- Age
- Where data is available, other protected characteristics

Data we collect and analyse:

- Number of applicants for each post by protected characteristics
- Shortlisting outcomes by protected characteristics
- Appointment outcomes by protected characteristics
- Composition of the workforce by protected characteristics and role/level
- Staff retention and turnover by protected characteristics
- Access to professional development and training by protected characteristics
- Promotion and progression by protected characteristics
- Disciplinary and grievance cases by protected characteristics (handled confidentially)
- Staff wellbeing and satisfaction survey data

How we use this data:

- Identify whether our recruitment processes are fair and attract diverse applicants
- Identify any barriers to particular groups applying for or being appointed to roles
- Ensure our workforce is diverse and reflects our community where possible
- Identify any inequalities in career progression or access to development
- Evaluate the effectiveness of our policies and practices
- Report to governors annually on workforce diversity
- Inform staff recruitment and development strategies

Monitoring the Curriculum and School Environment

What we monitor:

- Curriculum content and resources to ensure they are inclusive and represent diversity
- Teaching and learning approaches to ensure they meet the needs of all pupils
- The physical environment to ensure it is accessible to all
- School displays and communications to ensure they represent diversity positively
- Extra-curricular activities to ensure they are accessible and inclusive
- Implementation of the accessibility plan

How we monitor:

- Subject leader reviews and audits
- Learning walks and lesson observations
- Pupil voice and feedback
- Parent/carer surveys
- Accessibility audits
- Review of resources and materials
- Governor visits and monitoring

Monitoring Policy Implementation

What we monitor:

- Staff awareness and understanding of this policy
- Implementation of the policy in practice
- Effectiveness of training on equality and diversity
- Progress towards equality objectives
- Impact of equality initiatives and interventions
- Compliance with legal duties under the Equality Act 2010

How we monitor:

- Staff surveys and feedback
- Observations of practice
- Review of policy application in specific cases
- Tracking progress towards equality objectives
- Analysis of all the data outlined above
- Governor scrutiny and challenge
- External reviews or audits where appropriate

Reporting and Accountability

Termly reporting to governors includes:

- Analysis of pupil outcomes by protected characteristics
- Summary of discrimination incidents and actions taken
- Progress towards equality objectives
- Any areas of concern or emerging issues
- Impact of interventions and initiatives
- Recommendations for action

Annual reporting includes:

- Comprehensive analysis of all monitoring data
- Staff recruitment and workforce diversity data
- Review of equality objectives and setting of new objectives where appropriate
- Publication of equality information on the school website (as required by the Public Sector Equality Duty)
- Evaluation of the effectiveness of this policy

Governors' role in monitoring:

- The designated governor for equality meets regularly with the headteacher/equality lead to review data and progress
- The governing body receives termly reports and challenges the school to ensure continuous improvement
- Governors undertake monitoring visits focused on equality
- Equality is a standing item on governing body agendas
- The governing body reviews this policy annually

Using Monitoring Data to Drive Improvement

Monitoring is only valuable if it leads to action. We use our monitoring data to:

- Identify what is working well and celebrate success
- Identify gaps, inequalities or areas for improvement
- Set priorities and targets for improvement
- Allocate resources effectively
- Develop and refine our equality objectives
- Inform policy and practice across the school
- Hold ourselves accountable to our school community
- Demonstrate our compliance with the Equality Act 2010
- Drive continuous improvement in equality outcomes

We are committed to transparency in our monitoring and will publish key equality data on our website annually, in line with our duties under the Public Sector Equality Duty.

Reporting and recording incidents of discrimination

We are committed to creating an environment where everyone feels safe to report discrimination, harassment or victimisation. All reports will be taken seriously, investigated thoroughly, and appropriate action will be taken.

What Should Be Reported

You should report any incident or concern relating to:

- Discrimination based on any protected characteristic (disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation, age, marriage or civil partnership)
- Harassment, including sexual harassment
- Victimisation (being treated unfavourably because you have made a complaint or supported someone else's complaint)
- Bullying related to protected characteristics
- Discriminatory language, including racist, sexist, homophobic, biphobic, transphobic or disablist language
- Any other breach of this equality policy

This applies to incidents involving:

- Pupils
- Staff
- Governors

- Parents and carers
- Visitors
- Third-party providers

Confidentiality

We are committed to handling all reports with appropriate confidentiality. However:

- Information will be shared on a need-to-know basis to ensure effective investigation and safeguarding
- We cannot promise absolute confidentiality if there are safeguarding concerns or if we need to take action to protect others
- Records may be shared with external agencies where appropriate (e.g., police, local authority, Ofsted)
- Anonymised data may be published to demonstrate our monitoring and accountability

Questions, Complaints & Further Action

If you have any questions about the content or application of this policy, you should contact the school office.

How complaints are handled:

- All complaints regarding potential breaches of this policy will be treated in confidence
- Complaints will be investigated in accordance with the Complaints Procedure
- You will be kept informed of progress
- You will be informed of the outcome (within the bounds of confidentiality)
- You have the right to escalate your complaint through the stages of the Complaints Procedure if you are not satisfied

External complaints:

If you are not satisfied with the school's response to your complaint, you may have the right to complain to:

- The local authority (for maintained schools)
- The Education and Skills Funding Agency (for academies)
- The Equality and Human Rights Commission (for discrimination complaints)
- The police (if a criminal offence may have been committed)
- Ofsted (as part of their inspection process)

Policy Review

This policy is a public document and can be accessed by contacting the school office. It is reviewed annually, or sooner if required, by the governing body to ensure it remains effective, up to date, and compliant with current legislation and statutory guidance.

Signed: M. Shaw
Headteacher

Bal Grant
Chair of Governors

Date: March 2026