

EQUAL OPPORTUNITIES POLICY FOR STUDENTS & STAFF

Policy Owner PPS DSLs & HR	Applies to Prior Park Schools (Trust wide)	Superseded documents Equal Opportunities Policy
Associated documents Behaviour Policy, Counter-Bullying Policy, Disability, Capability and Appeals Policy Dignity at Work Policy Appraisal Process Admissions Policy	Review frequency Every year (unless the legislation/regulations update before this time) Implementation date 1 June 2020	Legal Framework Equalities Act 2010 KCSIE 2019

1. Introduction

Prior Park Schools (PPS) comprises three schools. Two of those schools, Prior Park College and The Paragon School are incorporated in England as Prior Park Educational Trust Ltd. The third school, Prior Park School Gibraltar, is incorporated in Gibraltar as Prior Park School Ltd. Both are companies limited by guarantee and registered charities.

2. Scope

Promoting equal opportunities is fundamental to the aims and ethos of Prior Park Schools. The Schools are committed to equal treatment for all staff, students, parents and visitors regardless of age, race, social and cultural background, linguistic background, gender, Special Educational Needs and Disability (SEND), religious views and beliefs, marital status, sexual orientation, pregnancy or maternity/paternity, gender reassignment, political views or trade union membership, and for all to have equality of opportunity.

3. Policy Aims

The aims of this policy and the School's ethos as a whole are to:

- Eliminate unlawful discrimination on grounds of any of the protected characteristics (the protected characteristics are; age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership and pregnancy and maternity).
- Strive to ensure that the school and its work environment is free of harassment and bullying and that everyone is treated with dignity and respect.
- Promote equality of opportunity for all members of the School community.
- Comply with the School's equality duties contained in the Equality Act 2010.

All members of the School- staff, students, governors, visitors, volunteers and contractors - are expected to comply with this policy.

All parents are expected to support the aims of this policy and the School's ethos of tolerance and respect.

4. STUDENT SPECIFIC

Admission

The School treats every application for admission in a fair and equal way in accordance with the School's Admissions Policy.

Our aim is to admit students with academic and other qualities such that the child would gain the maximum benefit from the opportunities available at the Prior Park Schools, whilst maintaining a balance between day and boarding students, boys and girls. In the event of there being more applications than places available, places will be offered in accordance with the following criteria; the weighting of these criteria may vary:

- whether the family is Catholic/Christian
- academic ability & school report or an informal teaching assessment
- extra-curricular interests & other talents

- siblings* at Prior Park College or other schools within Prior Park Schools
- previous attendance at The Paragon (for College entry)
- class size & size of the school roll
- other factors

** A child is a sibling if they are a full or half-brother or sister, an adoptive brother or sister or if they are children of the same household - although this does not guarantee entrance.*

The School accepts applications from, and admits, all prospective students irrespective of their gender, disability, gender reassignment, pregnancy and maternity, race, religion or belief or special educational needs ('SEND').

Parents must inform the School when submitting the Registration Form of any special circumstances relating to their child which may affect their child's performance in the admissions process and/or ability to fully participate in the education provided by the School. The School will not offer a place to a child with disabilities if, after reasonable adjustments have been considered, the School cannot adequately cater for or meet their needs.

Bursaries are means tested awards offered to those who meet the School's admission criteria but may otherwise be unable to attend the School due to financial hardship. (Details of our provision for bursaries can be found on our website or obtained from the bursar's office).

Educational services

The School affords all students access to educational provision including all benefits, services and facilities, irrespective of any protected characteristic (subject to our reasonable adjustments duty and considerations of safety and welfare). The School will not discriminate against a student on the grounds of any protected characteristic by excluding them or subjecting them to any other detriment.

The School will:

- Treat all members of the School community with respect and dignity and seek to provide a positive working and learning environment free from discrimination
- Endeavour to meet the needs of all children and ensure that there is no unlawful discrimination on the grounds of any protected characteristics
- Ensure that students with English as an additional language and students with an Education Health Care Plan receive necessary educational and welfare support
- Monitor the admission and progress of students from different backgrounds
- Challenge inappropriate discriminatory behaviour by students and staff
- Offer all students access to all areas of the curriculum and a full range of extra-curricular activities
- Work with parents and external agencies where appropriate to combat and prevent discrimination in School
- Ensure that it reviews, monitors and evaluates the effectiveness of inclusive policies and practices
- Use the curriculum, assemblies and PSHE to:
 - Promote tolerance of and respect for each other, paying particular regard to the protected characteristics set out in the Equality Act 2010.
 - Promote positive images and role models to avoid prejudice and raise awareness of related issues.

The School recognises that discrimination may be direct, indirect, or arising from disability whether or not it was intentional. Harassment and bullying in all their forms are unacceptable and will be dealt with in accordance with the School's Behaviour and Counter-Bullying policies.

Religious belief

Although two School's religious ethos is based on Catholic Christian values and tradition, and one is Christian, each School is inclusive and welcomes and respects the rights and freedoms of individuals from other religions and faiths (or with no religion or faith) subject to considerations of safety and welfare and the rights and freedoms of other members of the School community.

The governing body, through the senior leadership team, actively promotes the fundamental British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs.

School Uniform

All students are required to wear the approved school uniform until Year 12, and a strict "business dress" code operates for Years 12 and 13. The uniform is as such that it accommodates for variations depending on personal choice. For further guidance please read each school's own Uniform Policy.

Reasonable adjustments for students with disability

The School has an ongoing duty to make reasonable adjustments for students with a disability to ensure they do not suffer a substantial disadvantage in comparison with other students. Access to the curriculum is equal in terms of recruitment of students, support during term time and the taking of exams. PPS are very proud of the educational support that we are able to provide to pupils at all three schools. Dedicated learning support teams help each pupil to achieve their potential.

As well as educational support, we also make adjustments where possible for those with a physical disability to ensure that they have the support that they need to have an equal experience of education within the Prior Park Schools and are a valued member of the community with each pupil able to make a positive contribution in a supportive environment.

Each School has an Accessibility Plan in place which can be found on the School website and a hard copy can be made available upon request. This sets out the School's plan to increase the extent to which disabled students can participate in the School's curriculum; improve the physical environment of the School for the purpose of increasing the extent to which disabled students are able to take advantage of education and benefits, facilities or services provided or offered by the School; and improve the delivery to disabled students of information which is readily accessible to students who are not disabled.

Breach of this policy

Students who are in breach of this policy may be sanctioned in accordance with the School's Behaviour Policy.

Raising a Complaint

Current students and parents can raise a complaint through the School's Complaints Procedure as set out in our Complaints Policy.

5. STAFF SPECIFIC

The purpose of this Equal Opportunities Policy is to communicate our commitment to equality of opportunity in employment, with the aims of ensuring that all staff, former staff and job applicants are treated fairly and equally and supporting PPS' objective of providing a learning and working environment that is free from all forms of discrimination.

This section of the policy applies to all staff, volunteers, Governors and visitors within the Schools, including employees and other workers, such as agency workers, temporary workers and contractors. All staff are expected to put this policy into practice.

This policy does not form part of employees' contracts of employment and PPS may amend it at any time.

Employment

PPS is fully committed to providing equality in the workplace and all opportunities for, and during employment, will be afforded to individuals fairly and irrespective of age, disability, gender, gender reassignment, marital or civil partnership status, pregnancy, maternity or paternity, race including colour, ethnic or national origins and nationality, religion or belief or sexual orientation ("the protected characteristics").

PPS will not unlawfully discriminate in the arrangements we make for recruitment and selection or in the opportunities afforded for employment, training or any other benefit. All decisions will be made fairly and objectively. In order to ensure consistency in recruitment, all candidates seeking employment with us must complete an application form. This allows the selection panel to consider each candidate equally against a set of defined criteria specific to each job role. Likewise, all candidates shortlisted for interview will undertake the same assessment activities, and interviews will be carried out and scored based on relevant criteria. We aim, as far as reasonably practicable, to ensure that all our working practices are applied fairly and consistently and, where necessary, we will take reasonable steps to avoid or overcome any particular disadvantage these may cause and to promote equality.

PPS respects an individual's right to choose whether or not to belong to a trade union and membership status will have no bearing on an applicant's suitability for employment or result in any detrimental treatment when working for a school.

As part of the application process we ask all candidates to make a Criminal Record declaration. Upfront disclosure of a criminal offence may not debar you from employment as we shall consider the nature of the offence, how long ago it was committed, at what age it was committed and any other relevant factors.

Prior Park College and Prior Park School Gibraltar (only) are designated as a School with a religious character by the DfES. This may be taken into account when recruiting staff when appropriate to do so. Notwithstanding this, PPC and PPSG undertake to review periodically their selection criteria and procedures to maintain a system where individuals are selected, promoted and treated on the basis of their merits and abilities.

Specific Responsibilities

The Governors have overall responsibility for the effective operation of this policy and for ensuring compliance with the Equality Act 2010 and associated legislation and for observing relevant Codes of Practice.

The Head and Senior Leadership Team, with the support of HR, are responsible for monitoring and reviewing the policy and for ensuring that all employment-related policies, procedures and practices adhere to this policy. All staff have a responsibility not to discriminate or harass other staff, students, parents, governors, visitors and contractors, and to report any such behaviour of which they become aware to their line manager.

Line Managers are responsible for implementing the Equal Opportunities Policy and must apply the policy as part of their day-to-day management of the school.

Forms of discrimination

The following are forms of discrimination that this policy aims to avoid:

- Direct Discrimination occurs when a person is treated less favourably because of a protected characteristic that they have.

In limited circumstances, employers can directly discriminate against an individual for a reason related to any of the protected characteristics where there is an occupational requirement. The occupational requirement must be crucial to the post and a proportionate means of achieving a legitimate aim.

- Indirect Discrimination occurs when a provision, criterion or practice is applied equally to everyone, but has a disproportionately adverse effect on people who share a particular protected characteristic. To be justified the provision, criterion, or practice must be necessary for legitimate business reasons in circumstances where less discriminatory alternatives are not reasonably available.
- Associative discrimination is where an individual is directly discriminated against or harassed for association with another individual who has a protected characteristic (although it does not cover harassment because of marriage, civil partnership, pregnancy and maternity).
- Perceptive discrimination is where an individual is directly discriminated against or harassed based on a perception that they have a particular protected characteristic when they do not, in fact, have that protected characteristic (other than marriage and civil partnership, and pregnancy and maternity).
- Victimisation occurs where an employee is subjected to a detriment, such as being denied a training opportunity or a promotion because they made or supported a complaint or raised a grievance under the Equality Act 2010, or because they are suspected of doing so. However, an employee is not protected from victimisation if they acted maliciously or made or supported an untrue complaint in bad faith.
- Harassment is unwanted conduct, related to one of the protected characteristics (other than marriage, civil partnership, pregnancy and maternity which are covered by direct discrimination provisions in the Equality Act 2010) that has the purpose or effect of violating a person's dignity; or is reasonably considered by that person to create an intimidating, hostile, degrading, humiliating or offensive environment. It does not matter whether or not this effect was intended by the person responsible for the conduct.

Harassment can take many different forms and may involve inappropriate actions, behaviour, comments, emails or physical contact that cause offence or are objectionable. Harassment may involve a single incident or persistent behaviour that extends over a period of time and can occur even if someone did not mean to cause offence. It also

means that a person can be subjected to harassment by behaviour that is not aimed at them directly. Harassment is always unacceptable and, where it relates to a protected characteristic, it will amount to an unlawful act of discrimination.

- Discrimination arising from disability - In addition to the above, it is unlawful to treat a person unfavourably because of something that is the result, effect or outcome of their disability, unless the treatment is necessary and can be objectively justified.
- Failure to make reasonable adjustments is 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 that disability and the employer has failed to make reasonable adjustments to enable the disabled person to overcome the disadvantage.

Creating equal opportunities in the workplace

There are a number of ways in which PPS aims to ensure equal opportunities in the workplace, including:

- **Recruitment and selection:** Recruitment and selection procedures will be free from bias or discrimination. Recruitment procedures will be conducted objectively and will be based upon specific and reasonable job-related criteria. Decisions regarding an individual's suitability for a particular role will be based on aptitude and ability. We will consider making appropriate reasonable adjustments to the recruitment process to ensure that disabled applicants are not substantially disadvantaged. Wherever possible, vacancies will be advertised as being suitable for flexible working, to encourage applications from individuals seeking work on a part time or job share basis.
- **Career development (promotion) and training:** All staff will be given an appropriate induction to enable them to fulfil the responsibilities of their role. All employees will be encouraged to develop their full potential and we will not unreasonably deny an employee access to training or other career development opportunities. These will be identified as part of an ongoing performance management process (Appraisal) and will be determined objectively, taking into account the needs of the school and available resources. Selection for promotion will be based on objective criteria and decisions will be made on the basis of merit.
- **Terms and conditions:** Our terms and conditions of service will be applied fairly and benefits and facilities will be made available to all staff who should have access to them, as appropriate. PPS operates a pay and benefits system that is transparent, based on objective criteria and free from bias to ensure that all employees are rewarded fairly for their contribution. Terms and conditions of employment for part-time employees will be provided on a pro-rata basis to full-time employees. Similarly, the terms and conditions for fixed term employees will be comparable with those given to permanent employees, except when different treatment can be objectively justified.
- **Employment policies and practices:** PPS aims to ensure that employment policies and practices, including any rules or requirements, do not directly or indirectly discriminate and are applied in a non-discriminatory manner. In particular we will ensure that all disciplinary decisions are fair and consistent and that selection for redundancy is based on objective criteria. PPS will consider making appropriate reasonable adjustments to the working environment or any work arrangements that would alleviate any substantial disadvantage these cause disabled staff. We will aim as far as reasonably practicable to accommodate the requirements of different religions and cultures and will consider

requests from employees to vary or change their working hours to enable them to care for a dependant in accordance with PPS' Flexible Working Policy.

- Working environment: All individuals have a right to be treated with dignity and respect and PPS takes reasonable steps to protect staff from discrimination, bullying or harassment and, in the event of a complaint, we will take appropriate action to prevent, as far as possible, a further occurrence. All staff are encouraged to report any incidents of inappropriate or unacceptable behaviour at work or that occurs during the course of employment, on or off premises, including at work social events (whether organised by PPS or not) or at formal or informal events involving staff, students, parents, governors or other work-related contacts. PPS has a separate Dignity at Work Policy and procedure for dealing with complaints of harassment.

Equal Opportunities Monitoring

PPS will monitor the effectiveness of this policy to ensure it is achieving its objectives. As part of this process we monitor:

- the ethnic, gender and age composition of our workforce and job applicants (including promotions)
- the number of people with disabilities within these groups
- access to training, promotion and other opportunities and benefits
- the impact of our employment policies, including use of the disciplinary and grievance procedure
- dismissals and other terminations

Information collected for monitoring purposes will be treated as confidential and will not be used for any other purpose.

Raising a complaint of discrimination

If you believe you have been discriminated against, you should raise the matter in accordance with the PPS Disability, Capability, Grievance and Appeals Policy. A copy of the policy can be found in SharePoint.

If you believe that you may have been subject to harassment you are encouraged to raise the matter under PPS' Dignity at Work Policy.

Any employee who is found to have committed an act of discrimination, or breached this policy in any other way, may be subject to action under the Disciplinary Procedure, up to and including dismissal.

Non-employees will be subject to appropriate formal action that may, depending on the circumstances, involve terminating any contract or agreement.

PPS will also take seriously any malicious or, in its opinion, unwarranted allegations of discrimination and will take appropriate action, disciplinary or otherwise, where necessary.

6. Monitoring and review

The Head at each school regularly monitors and reviews the effectiveness of this policy and reports to the governors annually on the policy's effectiveness in practice.