

ESNE 22

Single Equality Policy

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1. Purpose and status

King Edwin School is committed to an inclusive culture in which every person is treated with dignity and respect, barriers are identified and reduced, difference is valued, and pupils are supported to participate fully in school life and achieve ambitious outcomes.

This policy replaces ESNE22 and retains its core commitments to equality, inclusion, high expectations, curriculum access, prompt reporting of prejudice and discrimination, use of CPOMS/Progresso, EHCP monitoring and stakeholder voice. It has been reorganised and strengthened for the 2026–2027 school year.

The school will apply equality law to the context in which a decision is made. Duties relating to pupils, employees, applicants and services are not identical, and the school will avoid treating the list of protected characteristics as though every provision applies in exactly the same way in every context.

2. Legal and regulatory framework

This policy is informed by the legal and regulatory framework applicable to an independent special school in England, including:

- Equality Act 2010, including Part 5 (work), Part 6 (education) and the reasonable-adjustment provisions;
- Human Rights Act 1998;
- Children Act 1989 and Children Act 2004;
- Children and Families Act 2014 and applicable SEND/EHCP duties;
- Education (Independent School Standards) Regulations 2014 and the Department for Education's 2026 Independent School Standards guidance;
- Keeping Children Safe in Education 2026;
- applicable accessibility planning requirements and statutory guidance;
- the school's contractual, safeguarding, complaints, behaviour, admissions, SEND, accessibility, staff conduct and HR procedures.

Public Sector Equality Duty (PSED). King Edwin School will not assume that the statutory PSED and its specific publication duties apply to it in the same way as they apply to maintained schools. Nevertheless, the school adopts the underlying principles as good practice: eliminating unlawful discrimination, advancing equality of opportunity and fostering good relations. Where the school is carrying out a function to which a public-sector duty lawfully attaches, it will comply with that duty.

3. Equality principles

- All pupils are entitled to ambitious expectations and equitable access to education.
- Equality does not always mean treating everyone identically; different or additional provision may be necessary to remove disadvantage or meet disability-related needs.
- Decisions will be based on individual need, evidence, safety and law rather than stereotypes or assumptions.
- The school will challenge prejudice, discriminatory language, harassment, bullying and victimisation.
- Pupil and family voice will inform reasonable adjustments, support and improvement wherever appropriate.
- Equality considerations will be embedded in school improvement, safeguarding, curriculum planning and staff development.

4. Protected characteristics and prohibited conduct

The Equality Act 2010 identifies nine protected characteristics: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation. The relevance and legal protection attached to a characteristic depends on the context.

The school will not unlawfully discriminate. Relevant forms of prohibited conduct include direct discrimination, indirect discrimination, discrimination arising from disability, failure to make reasonable adjustments, harassment and victimisation.

Term	School interpretation
Direct discrimination	Treating a person less favourably because of a protected characteristic where the law prohibits this.
Indirect discrimination	Applying a provision, criterion or practice that puts people sharing a protected characteristic at a particular disadvantage and cannot be objectively justified where the law permits justification.
Discrimination arising from disability	Unfavourable treatment because of something arising in consequence of disability, unless the treatment is lawfully justified.
Reasonable adjustments	Reasonable steps to avoid substantial disadvantage for disabled people, including relevant auxiliary aids or services.
Harassment	Unwanted conduct related to a protected characteristic that has the purpose or effect defined by the Equality Act in the applicable context.
Victimisation	Subjecting a person to detriment because of a protected act, such as raising an equality complaint.

5. Roles and responsibilities

5.1 Proprietor / Governing Body

- provides oversight of compliance with equality law and relevant Independent School Standards;
- receives appropriate anonymised information about equality themes, incidents, complaints, adjustments and improvement actions;
- ensures that policies, resources and strategic decisions support equitable access and inclusion;
- holds leaders to account for implementation and impact.

5.2 Principal and senior leaders

- ensure this policy is implemented consistently and linked to school improvement;
- ensure pupils receive necessary resources, experiences, adjustments and support to participate fully;
- monitor outcomes and experiences of pupils and identify unexplained disparities;
- ensure discriminatory incidents are recorded, investigated, responded to and reviewed for patterns;
- ensure staff understand equality, inclusion, diversity and their reporting responsibilities.

5.3 All staff

- model respectful, inclusive behaviour and challenge prejudice and discriminatory language;
- maintain high expectations for all pupils, including disabled pupils and pupils with SEND;
- identify barriers and implement agreed adjustments/support;
- ensure teaching, resources, communication and assessment are free from unlawful bias and avoid stereotyping;

- report discrimination, prejudice-related incidents, harassment or victimisation promptly through school procedures.

6. Admissions and access to education

The school will operate admissions and placement arrangements in accordance with equality law, its admissions arrangements, commissioning/placement processes and the needs the school is approved and equipped to meet.

- Applicants and prospective pupils will not be subjected to unlawful discrimination in admissions decisions.
- Information about a pupil's disability or SEND will be used to understand need, suitability of provision, required adjustments and safe support—not as a proxy for discriminatory assumptions.
- Where the school believes it cannot meet a prospective pupil's needs, the reasons will be evidence-based, clearly recorded and communicated through the appropriate placement/admissions process.
- Admissions information and visits will be made accessible through reasonable adjustments where required.

7. Curriculum, teaching and learning

The school will plan, monitor, evaluate and review the curriculum so that it supports, challenges and engages pupils and provides equitable opportunities to make progress.

- Teaching will not discriminate against pupils contrary to the Equality Act 2010 and will reflect the Independent School Standards.
- Curriculum content will provide age- and developmentally-appropriate opportunities to learn about equality, diversity, respect and protected characteristics.
- Resources will be reviewed to avoid unnecessary stereotyping and to reflect diverse people, families, cultures and experiences.
- Assessment methods and learning activities will be adapted where reasonable to remove disability-related barriers.
- Staff will use pupil progress information, observations, EHCP outcomes and pupil voice to identify barriers and intervene early.

8. Disability and reasonable adjustments

King Edwin School recognises that disability equality requires active identification and removal of barriers. The duty to make reasonable adjustments is anticipatory in relevant school contexts: the school will consider the needs of disabled pupils generally as well as responding to known individual needs.

Reasonable adjustments may relate to provisions, criteria and practices and, where the law requires, auxiliary aids and services. Adjustments may include:

- communication methods, visual supports, accessible formats or assistive technology;
- adaptations to teaching, task presentation, pace, sensory environment or routines;
- adjustments to behaviour, attendance or reward systems where disability is relevant;
- access arrangements and reasonable adjustments for assessment/examinations;
- support for educational visits, enrichment, transitions and unstructured times;

- physical/environmental arrangements, seating, quiet spaces or equipment;
- additional preparation, staffing or individualised support where reasonable.

The school will not charge a disabled pupil or family for a reasonable adjustment that the school is required to provide. Decisions about reasonableness will consider effectiveness, practicability, cost/resources, health and safety, the interests of others and the school's circumstances, while keeping the pupil's access and participation central.

Where a requested adjustment is not agreed, the school will record the request, evidence considered, consultation undertaken, reasons for the decision and any alternative measures offered.

9. SEND, EHCPs and equality

SEND and disability overlap but are not interchangeable. A pupil may be disabled under the Equality Act without having SEND, and may have SEND without meeting the Equality Act definition of disability.

EHCP provision does not replace the school's Equality Act duties. Staff will consider both the provision specified in an EHCP and any reasonable adjustments required to avoid substantial disadvantage.

King Edwin School will monitor pupil progress through EHCP reviews, reports, education review meetings and its own tracking systems. The applicability of the SEND Code of Practice to the school will be stated accurately according to the school's legal/section 41 status; regardless, the school will use relevant SEND principles to support effective person-centred practice.

10. Accessibility

This policy should be read with King Edwin School's Accessibility Plan. The school will work progressively to improve access to the curriculum, the physical environment and information for disabled pupils in accordance with the duties that apply to the setting.

Accessibility will be considered in planned developments, procurement, communication systems, digital resources, educational visits and curriculum design rather than only after an individual difficulty arises.

11. Behaviour, attendance, suspension and exclusion

Equality considerations will be embedded in behaviour and attendance practice. Staff will consider whether disability, SEND, communication needs, trauma or other relevant circumstances contribute to behaviour or absence and whether reasonable adjustments or additional support are required.

Protected characteristics do not prevent proportionate behaviour management or safeguarding action. Decisions must, however, avoid unlawful discrimination and be based on the individual circumstances. Where suspension or exclusion is considered, leaders will apply the school's relevant policy and legal framework and record relevant equality/SEND considerations.

12. Prejudice-related and discriminatory incidents

King Edwin School adopts a clear response to discriminatory or derogatory language, prejudice-related incidents, bullying, harassment and victimisation. Staff will distinguish between a prejudice-related incident and conduct that meets a specific legal definition, while taking both seriously.

- Make the situation safe and support any pupil/person affected.
- Challenge the behaviour in a developmentally appropriate way.
- Record the incident promptly on CPOMS/Progreso under the appropriate category.
- Inform a senior leader/DSL where safeguarding concerns or risk are present.
- Investigate proportionately and hear relevant accounts.
- Provide education, restorative work and/or counselling/support where appropriate.
- Apply behaviour or staff procedures proportionately where required.
- Inform parents/carers where appropriate, taking account of safeguarding and confidentiality.
- Consider Early Help, children's social care, LADO, police or other external referral where thresholds are met.
- Monitor recurrence and analyse patterns involving individuals, groups, locations, times or protected characteristics.

Repeated incidents will trigger review of underlying causes, support, curriculum response, risk assessment and wider school practice. Anonymised themes will inform school improvement and governance oversight.

13. Safeguarding and equality

Equality and safeguarding are connected. Discrimination, identity-based bullying, sexual harassment, harmful sexual behaviour, hate incidents, exploitation or targeting of vulnerable pupils may indicate or create safeguarding risk.

Staff will follow the Child Protection/Safeguarding Policy and KCSIE 2026 whenever an equality concern also raises a safeguarding concern. The school will not allow confidentiality or fear of causing offence to prevent appropriate safeguarding information sharing.

14. Staff and employment equality

King Edwin School will apply the Equality Act 2010 to employment and recruitment. Equality principles apply to applicants, employees and workers across recruitment, terms and conditions, training, promotion, performance management, grievance, disciplinary action and termination.

- Recruitment decisions will be based on role-related criteria and safer-recruitment requirements, without unlawful discrimination.
- Reasonable adjustments will be considered for disabled applicants and employees.
- Pregnancy, maternity and other protected circumstances will be handled in accordance with employment law.
- Harassment, victimisation and discriminatory conduct by staff will be addressed through appropriate HR, safeguarding, low-level-concerns or disciplinary procedures.
- Staff raising equality concerns in good faith will be protected from victimisation.
- Training and development opportunities will be allocated fairly and barriers to participation considered.

15. Parents, carers, visitors and contractors

The school expects respectful, non-discriminatory conduct from all members of the school community. Communications will be made accessible through reasonable adjustments where required. Concerns about discriminatory conduct by visitors or contractors will be addressed proportionately, including restriction of access where lawful and necessary to protect pupils or staff.

16. Complaints and concerns

Pupils, parents/carers and others may raise equality concerns through the school's complaints procedure. Staff may use the appropriate grievance, dignity-at-work, whistleblowing or safeguarding process. The school will make reasonable adjustments to enable disabled people to access complaint procedures.

Complaints and their records will be handled in accordance with the school's current complaints policy and the Independent School Standards. This policy does not set a separate retention period that could conflict with those requirements.

Anonymous reports will be considered on the information available, although anonymity may limit investigation. No person should be subjected to victimisation for making or supporting a protected equality complaint.

17. Monitoring, equality information and governance

The school will use proportionate information to evaluate whether pupils and other members of the community experience fair access, respect, safety and opportunity. Monitoring will respect privacy and data-protection requirements.

- attainment, achievement, attendance and engagement information where meaningful;
- EHCP outcomes, Annual Reviews and education review information;
- reasonable-adjustment requests and themes;
- bullying, prejudice, discrimination and harassment incidents recorded on CPOMS/Progresso;
- complaints and outcomes;
- pupil, parent/carer and staff voice;
- participation in curriculum, enrichment and school activities;
- staff recruitment, development and employment information where proportionate and lawful.

Senior leaders will review themes during the school year. At least annually, the Principal will provide the proprietor/governing body with an appropriately anonymised equality overview identifying significant patterns, actions taken, impact and priorities for improvement.

The school may publish equality aims or objectives as good practice, but will distinguish voluntary commitments from statutory PSED-specific publication duties unless those duties legally apply.

18. Training and awareness

Staff will receive equality, inclusion and diversity training appropriate to their responsibilities. Training will link equality to safeguarding, SEND, reasonable adjustments, curriculum practice, behaviour, attendance and professional conduct. Additional training will be provided when monitoring, complaints, incidents or legal changes identify a need.

19. Review

This policy will be reviewed at least annually for 2026–2027 and thereafter at a frequency determined by the proprietor, and sooner where there is a significant change in equality law, statutory guidance, Independent School Standards, safeguarding requirements, CareTech/Spark of Genius policy or lessons learned from an incident or complaint.

The policy owner will ensure school-specific details remain accurate and that associated policies are updated where changes to this policy affect them.

Appendix A – Reasonable-adjustment framework

- ☐ 1. What barrier or substantial disadvantage is being experienced or reasonably anticipated?
- ☐ 2. Is disability relevant, and what information is available from the pupil/person, family, EHCP, professionals or staff observations?
- ☐ 3. What outcome is the adjustment intended to achieve?
- ☐ 4. What possible adjustments, auxiliary aids or alternative approaches have been considered?
- ☐ 5. How effective, practical and safe would each option be?
- ☐ 6. What are the cost/resource implications and can these reasonably be managed?
- ☐ 7. Has the pupil/person and, where appropriate, parent/carer been consulted?
- ☐ 8. What adjustment will be implemented, by whom and from when?
- ☐ 9. How will the adjustment be communicated to relevant staff while respecting confidentiality?
- ☐ 10. When will effectiveness be reviewed?
- ☐ 11. If an adjustment is declined, are the evidence, reasons and alternatives clearly recorded?

Appendix B – Response to discriminatory incidents

Stage	Expected action	Record / escalation
1. Immediate response	Make safe; stop/challenge behaviour; support affected person.	Immediate safeguarding escalation if risk exists.
2. Record	Record factual details and language used.	CPOMS/Progresso; relevant category.
3. Assess	Consider prejudice, discrimination, bullying, harassment, safeguarding and SEND/disability factors.	SLT/DSL involvement as appropriate.
4. Investigate	Gather accounts and relevant evidence proportionately.	Maintain confidentiality and fairness.
5. Respond	Education/restorative support, behaviour/HR response and victim support as appropriate.	Parent/carer contact where appropriate.
6. Escalate	Consider external agency referral where thresholds are met.	DSL/LADO/social care/police/other agency.
7. Review	Monitor recurrence and identify patterns.	Feed anonymised themes into improvement/governance.

Appendix C – Annual equality monitoring checklist

- ☐ Policy and associated policies reviewed for current legal/regulatory accuracy.
- ☐ Accessibility Plan reviewed alongside this policy.
- ☐ Reasonable-adjustment themes reviewed for timeliness and effectiveness.
- ☐ CPOMS/Progresso prejudice/discrimination incidents analysed for patterns.
- ☐ Complaints with equality themes reviewed and learning identified.

- ☐ Pupil progress, attendance and participation reviewed for meaningful disparities.
- ☐ EHCP/Annual Review information used to identify systemic barriers.
- ☐ Pupil, parent/carers and staff voice considered.
- ☐ Curriculum/resources reviewed for inclusion and avoidance of stereotyping.
- ☐ Staff training needs identified and addressed.
- ☐ Employment/recruitment equality information reviewed where proportionate and lawful.
- ☐ Annual anonymised equality overview presented to proprietor/governance.
- ☐ Improvement actions have named owners, deadlines and evidence of impact.

Document control note

This clean 2026–2027 revision removes the internal reviewer notes and highlighted amendments from ESNE22. It preserves the original policy's inclusive ethos and practical school procedures while expanding the framework for equality law, reasonable adjustments, disability, admissions, employment, accessibility, safeguarding and governance oversight.