

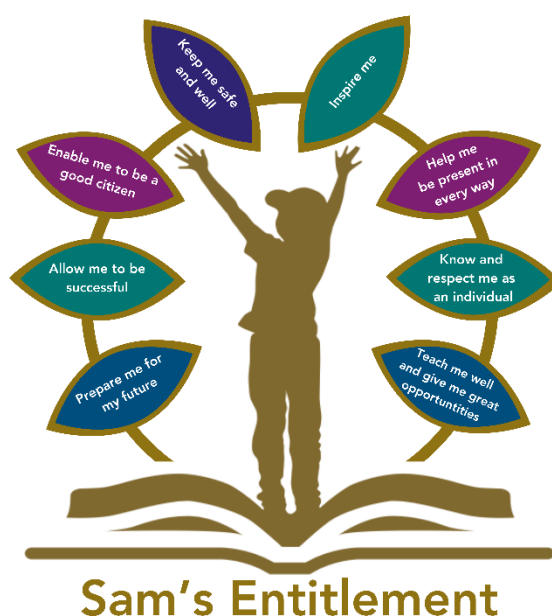


## HET Equality, Diversity and Inclusion (EDI) Policy

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Approved By:	Trust Board	Date:	June 2025
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## 1. Introduction

- 1.1 “Hamwic Education Trust (HET) believe that all pupils should receive a high quality, enriching, learning experience in a safe and inclusive environment, which promotes excellence through a broad curriculum that prepares them for their future and opens doors to a diverse array of opportunities as well as that all pupils and adults within HET flourish as individuals and together.”
- 1.1 HET recognises that by valuing and promoting equal opportunities in employment for all employees and job applicants and avoiding unlawful discrimination in employment and delivery of services, we will be able to deliver first class education and value the differences our workforce brings to HET.
- 1.2 HET aims to create a working environment in which all individuals are able to make best use of their skills, free from discrimination or harassment, and in which all decisions are based on merit. HET also values diversity and recognises the varied contributions that a diverse workforce brings to an organisation; HET are committed to drawing on different perspectives and experiences of individuals which will add value to what we do. HET acknowledges intersectionality and the impact that a wide variety of differences will have on the individual and the workplace.
- 1.3 HET will not discriminate against employees on the basis of:
- 1.3.1 age,
  - 1.3.2 disability,
  - 1.3.3 gender reassignment,
  - 1.3.4 gender definition,
  - 1.3.5 intersex and non-binary,
  - 1.3.6 marital or civil partner status,
  - 1.3.7 pregnancy or maternity,
  - 1.3.8 race, colour, nationality, Ethnic or national origin,
  - 1.3.9 religion or belief,
  - 1.3.10 sex or sexual orientation; or
  - 1.3.11 any combination of those listed above (the protected characteristics).
- 1.4 HET expect employees to treat all colleagues, pupils, parents and carers, visitors, clients, customers, suppliers and former employees regardless of whether the legal protection of having a protected characteristic applies.
- 1.5 This policy complies with the requirements of the Gender Recognition Act 2004 and the Equality Act 2010. Under the General Public Sector Equality Duty of the Equality Act 2010, HET must have due regard to and are committed to:
- Eliminating discrimination, harassment and victimisation,
  - Advancing equality of opportunity between people who share a protected characteristic and those who do not,
  - Setting diversity objectives,
  - Senior leaders championing diversity,
  - Securing top-level ownership and sponsorship,
  - Developing and cascading a diversity vision statement; and
  - Fostering good relations between people who share a protected characteristic and those who do not.

The duty covers the protected characteristics of race, disability, sex, age, sexual orientation, religion or belief, pregnancy and maternity, gender reassignment, gender definition, intersex and non-binary. The first part of the



duty - the duty to eliminate discrimination, harassment and victimisation - also applies to the protected characteristic of marriage and civil partnership. As part of our duty, we publish on our website:

- Our equality objectives (at least every four years); and
- Information that demonstrates our compliance with this duty.
- We will also publish gender pay gap reporting in line with the regulations.

1.6 As part of the application of this policy, HET may collect, process and store personal data and special categories of data in accordance with our data protection policy. We will comply with the requirements of Data Protection Legislation (being the UK General Data Protection Regulation and Data Protection Act 2018) and any implementing laws, regulations and secondary legislation, as amended or updated from time to time, in relation to how we collect, hold and share personal data.

1.7 This policy has been implemented following consultation with Trade Unions.

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

## 2. Scope and purpose

2.1 This policy covers all individuals working at all levels and grades in HET including trustees, governors, school leaders, senior leadership, employees, consultants, contractors, trainees, part-time and fixed-term employees, volunteers, casual workers and agency staff (collectively referred to as **employees** in this policy).

2.2 This policy applies to all aspects of the employment relationship and covers job advertisements, recruitment and selection, training and development, opportunities for promotion, appraisals, conditions of service, pay and benefits, conduct at work, disciplinary and grievance procedures, and termination of employment. It also applies to former employees for example in the provision of employment references. This policy focuses on employment and does not cover the provision of services to our pupils.

2.3 The purpose of this policy is to set out our approach to Equality, Diversity, Inclusion and Belonging, how we will tackle discrimination and how we will put our commitment into action and comply with the law, to ensure that equality and diversity is promoted in the workplace and our employees are not subject to and do not commit unlawful acts of discrimination.

## 3. Roles and responsibilities

3.1 Our Board has overall responsibility for the effective operation of this policy and for ensuring compliance with equality legislation. Day-to-day operational responsibility for this policy [including regular review of this policy,] has been delegated to our schools and HET HR.

3.2 All senior leaders must set an appropriate standard of behaviour, lead by example and ensure that those they manage adhere to the policy and promote our aims and objectives with regard to equal opportunities.

3.3 All employees must be aware of this policy and have a duty to act in accordance with this policy and not to discriminate against or harass other people including employees, former employees and job applicants treating them with dignity at all times. This also applies on work-related trips or events including social events. They should also apply this to how they treat members of the public in the provision of services and should support HET in meeting its commitment to provide equal opportunities for all and promoting diversity in the workplace.

3.4 HET are committed to EDIB and if employees have any questions, concerns or areas of improvement, please contact HET HR ([hr@hamwic.org](mailto:hr@hamwic.org)).



#### 4. Forms of discrimination

- 4.1 Discrimination by or against an employee is prohibited unless there is a specific legal exemption. Discrimination may be direct or indirect and it may occur intentionally or unintentionally.
- 4.2 Direct discrimination occurs where someone is treated less favourably because of one or more of the protected characteristics as set out above, for example, rejecting a job applicant because of their religious views.
- 4.3 Indirect discrimination occurs where someone is disadvantaged by a provision, criterion or practice that applies to everyone but puts people with a protected characteristic at a particular disadvantage. Such a requirement will need to be objectively justified. For example, requiring a job to be done full-time rather than part-time would adversely affect women because they generally have greater childcare commitments than men. Such a requirement would be discriminatory unless it can be objectively justified.
- 4.4 Harassment related to any of the protected characteristics is prohibited. Harassment is unwanted conduct that has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. Pregnancy and maternity, and marriage and civil partnership are not protected directly under the harassment provisions. However, pregnancy and maternity harassment would amount to harassment related to sex, and harassment related to civil partnership would amount to harassment related to sexual orientation. Harassment is dealt with further in our Anti-Bullying and Harassment Policy and in our Preventing Sexual Harassment at Work Policy.
- 4.5 The law protects employees, workers, contractors, self-employed staff, apprentices, those undertaking vocational training, volunteers, former workers and job applicants from sexual harassment and HET has a duty to take reasonable steps to prevent sexual harassment of its employees at work.
- 4.5.1 Examples of sexual harassment include, but are not limited to:
- Flirting, gesturing, making sexual remarks about someone's appearance in any means of communication.
  - Asking question about someone's sex life.
  - Telling sexually offensive jokes/pranks and or sharing pornographic or sexual images.
  - Unwanted touching, kissing or assault.
- 4.5.2 To report an incident of sexual harassment or to raise a concern contact your line manager, school leader or HET HR and please refer to the Preventing Sexual Harassment at Work Policy for details of how HET responds to a report of sexual harassment.
- 4.6 Victimisation is also prohibited. This is less favourable treatment of someone who has complained or given information about discrimination or harassment or supported someone else's complaint. This includes where someone mistakenly believes that the victim has complained, given information or supported someone else's complaint.
- 4.7 Discrimination by association is where an individual is directly discriminated against or harassed for association with another individual who has a protected characteristic.
- 4.8 Discrimination by perception is where an individual is directly discriminated against or harassed based on a perception that a person has a particular protected characteristic irrespective of whether they do have that protected characteristic (this does not include marriage and civil partnership and pregnancy and maternity).

4.9 Third-party harassment occurs where an employee is harassed and the harassment is related to a protected characteristic (other than marriage and civil partnership, and pregnancy and maternity), by third parties such as parents and carers, clients or customers.

4.10 Part-time and fixed-term employees should be treated the same as comparable full-time or permanent employees and enjoy no less favourable terms and conditions (on a pro-rata basis where appropriate) unless different treatment is justified.

## 5. Applying our policy to recruitment and selection

5.1 We aim to ensure that no job applicant suffers discrimination because of any of the protected characteristics. When recruiting or on promotion, we will aim to take steps to improve the diversity of our workforce and provide equality of opportunity. Our recruitment procedures are reviewed regularly to ensure that individuals are treated on the basis of their relevant skills and abilities. The HET privacy notices can be found on the school or HET website and sets out how we will gather, process and hold personal data of individuals during the recruitment process. Our recruitment processes are set out in our Recruitment Policy.

5.2 Job selection criteria as set out in the person specification will be regularly reviewed to ensure that they are relevant to the job. Short listing of applicants should be done by more than one person wherever possible and will be carried out objectively against the requirements of the job.

5.3 Job advertisements will avoid stereotyping or using wording that may discourage groups with a particular protected characteristic from applying.

5.4 We will take reasonable steps to ensure that our vacancies are advertised to a diverse labour market and, where relevant, to particular groups that have been identified as disadvantaged or underrepresented in HET. This policy will be made available to applicants upon request and can also be found on our website to download.

5.5 Applicants will not be asked about health or disability before a job offer is made, other than where it is necessary to:

- establish if an applicant can perform an intrinsic part of the job (subject to any reasonable adjustments).
- establish if any reasonable adjustments need to be made to enable an applicant to have a fair interview or assessment.
- carry out equal opportunities monitoring (which will not form part of the decision-making process).

5.5.1 Job offers will be conditional upon a satisfactory medical check in accordance with our obligation under Keeping Children Safe in Education<sup>i</sup>, where a school must verify the candidate's mental and physical fitness to carry out their work responsibilities in accordance with the Education (Health Standards) (England) Regulations 2003.

5.6 Applicants will not be asked about past or current pregnancy or future intentions related to pregnancy or gender identity or history. Applicants will not be asked about matters which may suggest an intention to discriminate on ground of a protected characteristic. Applicants will be asked to clarify which pronoun they would prefer to be referred to.

5.7 We are required by law to ensure that all employees are entitled to work in the UK. Assumptions about immigration status should not be made based on appearance, name or apparent nationality. All prospective employees, regardless of nationality, must be able to produce original specified documents before employment starts to satisfy current immigration legislation. The list of acceptable documents is available from <https://www.gov.uk/government/publications/right-to-work-checklist>.



5.8 To ensure that this policy is operating effectively, and to identify groups that may be underrepresented or disadvantaged in HET, we monitor diversity data as part of the recruitment process and as set out in our Workforce Privacy Notice and Data Protection Policy. Provision of this information is voluntary, and it will not adversely affect an individual's success at recruitment, or any other decision related to their employment. The information is removed from applications before short listing and kept in an anonymised format solely for the purposes stated in this policy. Analysing this data helps us take appropriate steps to avoid discrimination and improve equality and diversity.

## **6. Applying our policy to training, promotion, pay decisions and conditions of service**

6.1 The HET Workforce Privacy Notice for employees sets out how HET will collect, hold and share personal data of individuals during their employment. The Privacy Notices can be found on the school or HET website.

6.2 Employees training needs will be identified through the professional development and target setting process. All employees will be given appropriate access to training for their job and in order to enable them to progress within HET.

6.3 Our benefits and facilities are reviewed regularly to ensure that they are available to all employees who should have access to them and that there are no unlawful obstacles to accessing them.

6.4 Relevant national and local conditions of service within HET as applied to our employees, will meet the requirements of equal opportunities.

## **7. Applying our policy when terminating employment**

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

7.2 We will also ensure that disciplinary procedures and penalties are applied without discrimination, whether they result in disciplinary warnings, dismissal or other disciplinary action.

## **8. Disability discrimination**

8.1 Disability discrimination includes direct or indirect discrimination, any unjustified less favourable treatment because of the effects of a disability, and failure to make reasonable adjustments to alleviate the effects caused by a disability.

8.2 If an employee is disabled or becomes disabled, HET encourage employees to tell their line manager or HET HR about their condition so that HET can support them as appropriate.

8.3 If you experience difficulties at work because of your disability, you may wish to contact your line manager or HET HR to discuss any reasonable adjustments that would help overcome or minimise the difficulty. Your line manager or HET HR may wish to consult with you and your medical adviser(s) about possible adjustments. HET will consider the matter carefully and try to accommodate needs within reason. If HET consider a particular adjustment would not be reasonable, the reason will be explained and an alternative solution found where possible.

8.4 HET will monitor the physical features of our premises to consider whether they place disabled employees or job applicants at a substantial disadvantage compared to other employees. Where reasonable, we will take steps to improve access for employees who have a disability.



## 9. Breaches of this policy

- 9.1 If you believe that you may have been discriminated against or you have witnessed discrimination you are encouraged to raise the matter through the HET Grievance Policy. If you believe that you may have been subject to harassment you are encouraged to raise the matter through the HET Anti- Bullying and Harassment Policy. If you are uncertain which policy applies or need advice on how to proceed you should contact HET HR.
- 9.2 Allegations regarding potential breaches of this policy will be treated in confidence and investigated in accordance with the relevant procedure. Employees who make such allegations in good faith will not be victimised or treated less favourably as a result. False allegations which are found to have been made in bad faith will, however, be dealt with under the HET Disciplinary Policy.
- 9.3 Any employee who is found to have committed an act of discrimination or harassment will be subject to disciplinary action. Such behaviour may constitute gross misconduct and, as such, may result in summary dismissal. HET take a strict approach to serious breaches of this policy.

## 10. Review of policy

- 10.1 This policy is reviewed annually by HET HR. HET will monitor the application and outcomes of this policy to ensure it is working effectively.
- 10.2 HET will also monitor and review the treatment and outcomes of any complaints of discrimination, harassment or victimisation we receive to ensure that they are properly investigated and resolved, those who report or act as witnesses are not victimised, repeat offenders are dealt with appropriately, cultural clashes are identified and resolved, and workforce training is targeted where needed.

## 11. Associated Policies

- HET Anti-Bullying and Harassment Policy
- HET Data Protection Policy
- HET Disciplinary Policy
- HET Equal Opportunities Statement
- HET Grievance Policy
- HET Preventing Sexual Harassment at Work Policy
- HET Recruitment Policy
- HET School Objectives Template (for schools)

## 12. Appendices

### Appendix 1: HET Equal Opportunities Statement (Recruitment)

#### 1. Introduction

This Equal Opportunities Statement focuses specifically on the employment of employees in HET. HET is committed to equality for all in the appointment, development, training and promotion of employees, whether temporary, part time or full time, and in all dealings with pupils, parents and the wider community.

HET recognises the value of a diverse and inclusive workforce, and this policy sets out our approach to equal opportunities and the avoidance of discrimination at work. It applies to all aspects of employment with HET, including recruitment, pay and conditions, training, appraisals, promotion, conduct at work, disciplinary and grievance procedures, and termination of employment.

The Board of Trustees is responsible for this policy and any necessary training on equal opportunities.

This policy does not form part of any employee's contract of employment, and we may amend it at any time.

#### 2. Equal Opportunities Statement

HET is committed to promoting equal opportunities in employment and all job applicants will receive equal treatment regardless of age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation (**Protected Characteristics**).

HET will not unlawfully discriminate against or harass other people including current and former employees, job applicants, parents, students, suppliers and visitors. This applies in the workplace, outside the workplace (when dealing with parents, students, suppliers or other work-related contacts, and on work-related trips or events including social events).

The following forms of discrimination are prohibited under this policy and are unlawful:

**Direct discrimination:** treating someone less favourably because of a Protected Characteristic. For example, rejecting a job applicant because of their religious views or because they might be gay.

**Indirect discrimination:** a provision, criterion or practice that applies to everyone but adversely affects people with a particular Protected Characteristic more than others and is not justified.

**Harassment:** this includes sexual harassment and other unwanted conduct related to a Protected Characteristic, which has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment for them. Harassment is dealt with further in our Anti-Harassment and Bullying Policy.

**Victimisation:** retaliation against someone who has complained or has supported someone else's complaint about discrimination or harassment.

**Disability discrimination:** this includes direct and indirect discrimination, any unjustified less favourable treatment because of the effects of a disability, and failure to make reasonable adjustments to alleviate disadvantages caused by a disability.



### 3. Recruitment and Selection

Recruitment, promotion, and other selection exercises such as redundancy selection will be conducted based on merit, against objective criteria that avoid discrimination. Shortlisting will be done by more than one person where possible and in line with the HET Recruitment Policy.

Vacancies will generally be advertised to a diverse section of the labour market. Advertisements will avoid stereotyping or using wording that may discourage particular groups from applying.

In order to promote internal talent, some vacancies may only be advertised internally within HET.

Job applicants will not be asked questions which might suggest an intention to discriminate on grounds of a Protected Characteristic, for example, applicants will not be asked whether they are pregnant or planning to have children.

Job applicants will not be asked about health or disability before a job offer is made, except in the very limited circumstances allowed by law, for example, to check that the applicant could perform an intrinsic part of the job (taking account of any reasonable adjustments), or to see if any adjustments might be needed at interview because of a disability. Where necessary, job offers can be made conditional on a satisfactory medical check. Health or disability questions will be included in equal opportunities monitoring forms, which will not be used for selection or decision-making purposes.

### 4. Disabilities

If an employee is disabled or becomes disabled, HET encourages them to tell HET about their condition so that any reasonable adjustments can be considered or support that may be appropriate.

### 5. Part-time and Fixed-term work

Part-time and fixed-term employees will be treated the same as comparable full-time or permanent employees and enjoy no less favourable terms and conditions (on a pro-rata basis where appropriate) unless different treatment is justified.

### 6. Breaches of this Policy

HET take a strict approach to breaches of this policy, which will be dealt with in accordance with our Disciplinary Policy. Serious cases of deliberate discrimination may amount to gross misconduct resulting in dismissal.

If anyone believes that they have suffered discrimination you can raise the matter through the HET Grievance Policy, HET Anti-harassment and Bullying Policy or HET Complaints Policy. Complaints will be treated in confidence and investigated as appropriate.

No-one must be victimised or retaliated against for complaining about discrimination. However, making a false allegation deliberately and in bad faith will be treated as misconduct and dealt with under the HET Disciplinary Policy.



## Appendix 2: HET Equality Objectives

HET's Equality Objectives align with the overall vision that all pupils receive a high quality, enriching, learning experience in a safe and inclusive environment, which promotes excellence through a broad curriculum that prepares them for their future and opens doors to a diverse array of opportunities as well as that all pupils and adults within HET flourish as individuals and together.

- HET and its schools work in partnership collaboratively. We succeed together (one team)
- We take a collective responsibility for delivering excellence for all our schools
- We celebrate individuality – not corporate education
- We don't believe in a standardised approach to education
- Our schools help shape HET and what we offer
- Our strength is our people, who we value and develop

The following objectives have been agreed and are reviewed annually to ensure that progress is made against each objective:

<b>Objective 1</b>	<b>To ensure that the curriculum promotes equality, diversity and inclusion</b>
<i>Rationale</i>	Our schools all have the autonomy to develop their own curriculum so that they are able to meet the local needs of their pupils and community they are within.
<i>How this will be achieved</i>	The curriculum is shared with HET Standards Officers and the HET Leads as well as through HET networks. There are also reviews throughout the year to ensure the curriculum design is meeting the needs of the school.
<i>Progress</i>	The review process is already in place. All Ofsted reports this state that inclusion is effective in our schools and that the curriculum is accessible for all, including those with SEND. The Oracy and EAL projects provide curriculum perspectives for all pupil groups. Both projects are still at the pilot phase. The impact of these projects on the success of the curriculum, sense of belonging and achievement were presented to all leaders in May 2025.
<i>Link to HET Pillars</i>	Quality Assurance

<b>Objective 2</b>	<b>All pupils will make progress regardless of any protected characteristics</b>
<i>Rationale</i>	All pupils are entitled to learn and make progress
<i>How this will be achieved</i>	7 Habits of Highly Effective Teaching Leadership Development Sharing best practise Monitoring
<i>Progress</i>	May 2025 - All schools are working to define strong approaches to teaching. Leaders at all levels are benefitting from a strong CPD offer. This will be extended next year. Pupils with SEND are a focus for ambitious teaching. Reduced to Enhance classrooms in 11 schools provide a strong offer for inclusion. Where pupils with the most complex needs are supported in reduced classrooms, Ofsted

	<p>have commented on the effectiveness of the bespoke provision to support progress from individual start points.</p> <p>Improving reading opportunities and outcomes has been one of the secondary strategic aims; quality first teaching has delivered significantly more language opportunities for all pupils. Overall results are predicted to improve by 3% (9-4).</p> <p>Mid – year data drop shows that Reading has been prioritised in all schools. 84% of KS2 settings are on track to achieve National or better Reading results.</p> <p>There have been nine Ofsted inspections this year to date that all comment on the strength of the early reading offer.</p>
<i>Link to HET Pillars</i>	Outcomes, Leadership, Embedding habits

<b>Objective 3</b>	<b>To ensure that HET recruitment practises support our ED&amp;I Policy and Equal Opportunities Statement</b>
<i>Rationale</i>	Aligns with our Ethos and Values
<i>How this will be achieved</i>	Review of recruitment policy and processes (including job descriptions, person specifications, adverts, recruitment documentation, interview processes and induction) in conjunction with identifying a recruitment and HR system
<i>Progress</i>	May 2025 – Recruitment documentation being reviewed this term. HR system tender drafted with a view to tender in September 25 for implementation September 2026.
<i>Link to HET Pillars</i>	People Pillar

<b>Objective 4</b>	<b>To report our gender pay gap on an annual basis and undertake annual analysis of recruitment and promotion</b>
<i>Rationale</i>	Recruitment in education is getting more difficult due to external factors.
<i>How this will be achieved</i>	Review of recruitment data. Establishment of Flexible Working Party Group with School Leaders from the partnerships
<i>Progress</i>	May 2025 – HR system tender drafted with a view to tender in September 25 for implementation September 2026.
<i>Link to HET Pillars</i>	People Pillar

<b>Objective 5</b>	<b>To ensure the EDI Policy meets legal requirements and assists schools and senior leaders to identify potential barriers and set objectives to remove them.</b>
<i>Rationale</i>	To ensure legal compliance and that barriers to the recruitment, retention and development of all staff are removed
<i>How this will be achieved</i>	Monitoring of this policy through the reporting of data at Board Meetings
<i>Progress</i>	Approval of policy
<i>Link to HET Pillars</i>	People, Governance

### Appendix 3: Template School Equalities Policy (including Equalities Information and Objectives)

The template School Equalities Policy is located on the intranet. Please click on the following link to access the policy [Equalities-Policy-2024 2026.docx](#)

