



Equal Opportunities and Diversity Policy

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1. Equality statement and legal framework

ReFocus is committed to providing an inclusive school community in which pupils, staff, parents, carers, visitors and contractors are treated with dignity and respect. We will challenge discrimination, harassment, victimisation, prejudice and stereotyping and will take proportionate action to remove barriers to participation and achievement.

This policy reflects the Equality Act 2010, including its education and employment provisions; the Education (Independent School Standards) Regulations 2014; current Independent School Standards guidance; Keeping Children Safe in Education 2026; and relevant Equality and Human Rights Commission guidance and statutory codes.

ReFocus is an independent alternative provision school. It is not generally subject to the Public Sector Equality Duty in the same way as a maintained school, academy or public authority. It will nevertheless consider equality implications when developing policy, making significant decisions and reviewing provision as proportionate good practice.

2. Scope and key principles

The Equality Act identifies nine protected characteristics: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.

The way these protections apply depends on the context. The school provisions protect pupils and prospective pupils in relation to disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation. Age and marriage and civil partnership are not protected characteristics for the school provisions, although age remains relevant to fair and developmentally appropriate education. All nine characteristics are relevant in employment, subject to the provisions and exceptions in the Act.

ReFocus will not engage in unlawful direct or indirect discrimination, discrimination arising from disability, harassment or victimisation. People may sometimes need to be treated differently to achieve substantive equality, make reasonable adjustments, meet different needs or take lawful positive action.

No person will be treated unfavourably because they raise a concern, support a complaint, give evidence or otherwise do a protected act under the Equality Act.

3. Aims

- Provide fair access to education, employment, training and school activities.
- Maintain high expectations while recognising individual starting points, SEND, disability, health, safeguarding and placement needs.
- Identify and remove avoidable barriers to attendance, participation, progress and employment.
- Promote mutual respect and understanding, including respect for people with protected characteristics and those with no religion or belief.

- Prevent and respond effectively to discriminatory conduct, prejudice-related bullying and workplace harassment.
- Use information proportionately to identify patterns, improve practice and check the impact of decisions.

4. Pupils, placements and access to education

ReFocus will apply fair, transparent and non-discriminatory arrangements when considering admissions and commissioned placements. Decisions may take account of the school's registration, age range, available provision, whether needs can be met safely and the terms of the proposed placement, but not an unlawful discriminatory reason.

Where a pupil is referred or commissioned by a school or local authority, ReFocus will seek sufficient information to plan safe and equitable provision. The parties should agree responsibilities for SEND, EHC plans, medical needs, safeguarding, attendance, transport, access arrangements, review and reintegration. Incomplete information will not justify unlawful discrimination or delay urgent safeguarding action.

Behaviour, attendance, suspension and placement-ending decisions will be fair, evidence based and considered in context. Before significant action, ReFocus will consider disability, SEND, unmet need, reasonable adjustments, safeguarding, communication needs and whether apparently neutral arrangements create a particular disadvantage. This does not prevent proportionate action to protect safety, learning or the rights of others.

Pupils will have fair access to facilities, support, careers education, examinations, enrichment and educational visits. Any restriction must be lawful, necessary, proportionate and reviewed.

5. Curriculum, teaching and personal development

ReFocus will provide a broad, balanced and appropriate curriculum consistent with its registration and pupils' placement needs. Curriculum content itself is not generally subject to the school discrimination provisions in the same way as the manner in which education is delivered; however, teaching and access to the curriculum must be non-discriminatory.

- Resources and teaching will avoid unnecessary stereotypes and will reflect a diverse society in an age-appropriate way.
- Staff will challenge prejudicial language and misinformation and support respectful discussion of sensitive or contested issues.
- Teaching will promote respect for other people, including those with protected characteristics, while respecting lawful freedom of expression and religion or belief.
- Careers guidance will avoid assumptions based on sex, race, disability, background or other protected characteristics.
- Adaptations, auxiliary aids and examination access arrangements will be considered promptly where required.

Teaching about relationships, sex and health will follow the current RSHE Policy and statutory guidance. Safeguarding concerns arising from discussion or disclosure will be managed under the Child Protection and Safeguarding Policy.

6. Protected characteristics and inclusion

6.1 Disability and reasonable adjustments

ReFocus will anticipate and respond to the needs of disabled pupils, employees and others. A disability may be physical, sensory, cognitive or related to mental health and may be non-visible, fluctuating or recurring. The legal definition will be applied rather than assumptions about diagnosis or appearance.

Reasonable adjustments will be considered individually and in good time. They may include changes to policies or practices, communication, timetabling, teaching, equipment, auxiliary aids, assessment arrangements or the working environment. Adjustments will be recorded, communicated to those who need to know and reviewed when needs or circumstances change.

The proprietor will maintain and implement an Accessibility Plan addressing increased participation in the curriculum, improvements to the physical environment and access to information for disabled pupils. Staff adjustments and physical features will be addressed under the applicable employment duties.

6.2 Race, religion or belief

Racism, racial harassment and discrimination will not be tolerated. Race includes colour, nationality and ethnic or national origins. ReFocus will respect religion, philosophical belief and lack of religion or belief. Requests relating to observance, diet, dress or prayer will be considered fairly, balancing individual rights with safety, safeguarding, education and the rights of others.

6.3 Sex, pregnancy and maternity, and gender reassignment

Sex and gender reassignment are separate protected characteristics under the Equality Act. ReFocus will treat individuals respectfully and will not tolerate sexism, sexual harassment or discrimination because of pregnancy, maternity or gender reassignment. Decisions involving safeguarding, privacy, facilities, sport, intimate care or other sex-related matters will follow current law and statutory guidance and will be considered carefully on the facts of the individual case.

6.4 Sexual orientation

ReFocus will not make assumptions about sexual orientation and will challenge homophobic or biphobic language, bullying and discrimination. Curriculum questions will be answered accurately, appropriately and without unlawful discrimination.

6.5 Age and marriage or civil partnership

Age and marriage or civil partnership are protected in employment. Employment decisions, training and progression will not unlawfully disadvantage a person because of either characteristic. Age-appropriate distinctions for pupils may be made where educationally or legally appropriate.

7. Recruitment, employment and workplace harassment

Recruitment will follow Keeping Children Safe in Education 2026 and ReFocus's Safer Recruitment Policy. Job descriptions, advertisements, shortlisting, interviews, appointment, pay, training, promotion, performance management and termination will be fair and based on objective, relevant criteria. Equality monitoring information will be separated from selection decisions where practicable.

Questions about health or disability before an offer will be asked only where lawful, including to establish whether an applicant needs an adjustment for the recruitment process or can perform a function intrinsic to the role. Reasonable adjustments will be considered throughout recruitment and employment.

ReFocus will take proactive and proportionate steps to prevent workplace harassment. From 30 October 2026, the employer duty is strengthened to require all reasonable steps to prevent sexual harassment of employees, and employers must not permit harassment of employees by third parties where they have failed to take all reasonable steps to prevent it.

- Assess foreseeable risks, including work with pupils, parents/carers, visitors, contractors, off-site activity, lone working, social events and online communication.
- Maintain clear standards, reporting routes and proportionate protective measures.
- Provide suitable induction and refresher training.
- Respond promptly to concerns, protect people from victimisation and offer appropriate support.
- Review incidents and patterns and improve controls where necessary.

This section should be read with the Staff Code of Conduct, Anti-harassment and Bullying Policy, Grievance Procedure and disciplinary procedures. A breach may result in action under the relevant procedure.

8. Prejudice-related incidents, bullying and safeguarding

Staff must challenge and report prejudice-related language, bullying, harassment or discriminatory behaviour. Reports will be recorded using the appropriate behaviour, safeguarding or staff procedure, with enough information to identify patterns while protecting confidentiality.

The response will consider the wishes and welfare of the person affected, safeguarding, SEND and communication needs, the seriousness and context of the conduct, previous incidents, appropriate education or restorative work, sanctions and referral to external agencies. A serious incident, discriminatory abuse, sexual harassment or targeted online behaviour may also require a safeguarding response.

Freedom of expression and religion or belief will be respected, but neither provides a right to discriminate against, harass or threaten others. Responses will be necessary and proportionate and will distinguish lawful expression from conduct that meets the legal or school threshold for action.

9. Roles and responsibilities

9.1 Proprietor/owners

- Retain legal accountability for compliance with the Equality Act and Independent School Standards.
- Ensure suitable policies, staffing, training, accessibility planning and resources.
- Approve the policy and receive assurance about significant risks, patterns and actions.

9.2 Headteacher

- Lead implementation and promote an inclusive culture.
- Ensure significant decisions consider equality, reasonable adjustments and safeguarding.
- Ensure concerns are addressed under the correct procedure and that staff understand their responsibilities.
- Report appropriate monitoring information and significant issues to the proprietor and governing board.

9.3 Governing board

The governing board, including the Safeguarding Governor where relevant, provides support, constructive challenge and oversight. It does not replace the proprietor's legal accountability or the Headteacher's operational responsibility.

9.4 Staff

- Model respectful conduct and apply expectations fairly.
- Plan inclusive teaching and make agreed reasonable adjustments.
- Challenge and report discriminatory behaviour, harassment and victimisation.
- Maintain appropriate confidentiality and complete required training.

9.5 Pupils, parents/carers, visitors and contractors

All members of the school community are expected to treat others with dignity, follow reasonable school expectations and report concerns. Visitors and contractors must comply with this policy and relevant contractual, safeguarding and site requirements.

10. Reporting concerns and complaints

Pupils may report a concern to any trusted member of staff. Parents, carers and members of the public should normally raise concerns with the Headteacher under the Complaints Policy. Staff should use the appropriate line-management, grievance, whistleblowing, safeguarding or anti-harassment route. Concerns about the Headteacher should be referred to the proprietor or nominated governing-board representative.

Reports will be acknowledged and considered promptly, fairly and as confidentially as possible. ReFocus will explain the applicable procedure, immediate protective action, likely timescale and available support. Anonymous reports will be considered so far as the information permits. No person will be penalised for raising a concern in good faith or participating in an investigation.

Where a concern may be a safeguarding matter, the Designated Safeguarding Lead must be informed without delay. This policy does not prevent referral to the police, local authority, Equality Advisory and Support Service, ACAS, an employment tribunal or another appropriate body.

11. Monitoring, information and review

The Headteacher will monitor implementation and report proportionate, anonymised information to the proprietor and governing board. Monitoring may include:

- admissions and placement decisions;
- attendance, progress, behaviour, suspensions and placement endings;
- access to curriculum, enrichment, careers and examinations;
- reasonable adjustments and accessibility-plan actions;
- recruitment, training, progression and staff concerns; and
- prejudice-related incidents, bullying, harassment, complaints and outcomes.

Information will be interpreted cautiously, taking account of small cohorts, individual context and data-protection requirements. Monitoring is intended to identify possible disparities and questions for further examination; it will not be treated as proof of discrimination without proper investigation.

The policy will be reviewed annually and sooner following significant legal or statutory guidance changes, a serious incident, evidence of unequal impact or a material change in provision. The October 2026 employment changes and any final supporting guidance will be checked on commencement and reflected in associated staff procedures and training.