



The Complete Works Policies

Equality, Inclusion and Diversity Policy

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**Reviewed by: Amy Jones - Director of Operations -
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**Ratified by: Adam Dalton - Executive Headteacher-
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Next Review: September 2027

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1. Aims

The Complete Works (TCW) is committed to creating an inclusive, respectful and equitable environment in which every student and member of staff is treated with dignity and respect. We recognise and value the diversity of our school community and are committed to ensuring that no individual is unlawfully discriminated against, harassed or victimised.

This policy sets out TCW's commitment to:

- promoting equality of opportunity
- preventing and challenging discrimination
- promoting inclusion and belonging
- recognising and valuing diversity
- removing or reducing barriers to participation and achievement
- making reasonable adjustments where required
- challenging prejudice, stereotyping and discriminatory behaviour
- promoting positive relationships between different groups
- ensuring that equality considerations inform decision-making across the school; and
- supporting students and staff to participate fully in school life.

TCW recognises that treating everyone fairly does not necessarily mean treating everyone identically. Fairness may require different approaches, reasonable adjustments, additional support or other lawful measures to remove or reduce disadvantage.

Equality, inclusion and diversity form part of TCW's wider safeguarding culture. Discrimination, prejudice, harassment and exclusion can have a significant impact on a child's wellbeing, safety, attendance, engagement and ability to learn. Staff must therefore consider whether equality-related concerns also raise safeguarding concerns.

2. Policy Links

This policy supports and should be read alongside:

- Safeguarding and Child Protection Policy
- Behaviour Policy
- Anti-Bullying Policy
- Anti-Racism Policy
- SEN Policy
- Admissions Policy
- Safer Recruitment Policy
- Staff Code of Conduct
- Complaints Policy
- Grievance Policy
- Disciplinary Policy
- Health and Safety Policy
- Attendance Policy
- Relationships and Sex Education/PSHE policies, where applicable
- Data Protection and Privacy policies

Where an equality-related concern also raises safeguarding, disciplinary, bullying or other concerns, the relevant policy and procedure will also apply.

3. Legal and Statutory Framework

This policy has regard to and should be read alongside relevant legislation, statutory guidance and professional guidance, including:

- Equality Act 2010;
- Education Act 2002;
- Children Act 1989;
- Children Act 2004;
- Children and Families Act 2014;
- Special Educational Needs and Disability Regulations 2014;
- Human Rights Act 1998;
- Independent School Standards Regulations 2014;
- Keeping Children Safe in Education 2026;
- Working Together to Safeguard Children 2026;
- Relationships Education, Relationships and Sex Education and Health Education statutory guidance;
- relevant Equality and Human Rights Commission guidance and Codes of Practice; and
- other applicable statutory guidance and legal requirements.

The Equality Act 2010 protects individuals against discrimination, harassment and victimisation in education and employment. Schools have specific duties under Part 6 of the Act in relation to pupils, while employment provisions apply to staff and applicants.

TCW will keep this policy under review where legislation, statutory guidance, case law or regulatory expectations change.

4. Protected Characteristics

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 school provisions of the Equality Act do not apply to all nine characteristics in the same way. In particular, age and marriage and civil partnership are not protected characteristics for pupils under the school provisions of the Act, although they remain relevant to employment and other legal duties.

TCW will nevertheless seek to ensure that all members of its community are treated with dignity and respect.

The school will also challenge behaviour that is prejudicial, discriminatory, harmful or exclusionary even where it does not meet the legal definition of unlawful discrimination.

5. Definition

5.1 Equality

Equality means ensuring that individuals are protected from unlawful discrimination and have fair access to opportunities, education, services and participation.

5.2 Inclusion

Inclusion means creating an environment in which individuals feel respected, valued, safe and able to participate fully.

5.3 Diversity

Diversity recognises and values differences between individuals and groups within our community.

5.4 Discrimination

Discrimination may include:

- direct discrimination;
- indirect discrimination;
- discrimination arising from disability;
- failure to make reasonable adjustments where legally required;
- harassment; and
- victimisation.

Discrimination may be unlawful even where there was no intention to discriminate.

5.5 Prejudice

Prejudice is a preconceived or unreasonable attitude towards an individual or group. Prejudice may be expressed through language, behaviour, decisions, assumptions, stereotypes or exclusion.

5.6 Protected characteristic

A protected characteristic is one of the characteristics protected by the Equality Act 2010.

6. TCW's Equality, Inclusion and Diversity Objectives

TCW will:

- promote equality of opportunity across all areas of school life;
- create a culture where everyone is treated with dignity and respect;
- challenge discrimination, prejudice, stereotyping, bullying and harassment;
- promote positive attitudes towards diversity;
- ensure students understand equality, diversity and respectful relationships in an age-appropriate way;
- make reasonable adjustments for disabled students and staff where required;
- identify and address barriers to learning, participation and achievement;
- consider equality when developing policies, procedures and practices;
- monitor relevant data to identify potential disadvantage or disproportionality;
- take proportionate action where monitoring identifies concerning patterns;
- ensure admissions and education decisions are fair and lawful;
- ensure recruitment, promotion, development and employment decisions are fair and lawful;
- provide appropriate training to staff;
- ensure curriculum materials and resources are appropriately representative and do not reinforce harmful stereotypes;

- promote an environment in which students and staff feel able to raise concerns;
- respond promptly and appropriately to reports of discrimination or harassment; work constructively with parents/carers and relevant professionals; promote an anti-racist and anti-discriminatory culture; and ensure equality considerations form part of wider safeguarding and wellbeing practice.

Specifically for our students, we will:

- Provide a secure environment in which all our students can flourish and achieve all five outcomes of 'Every Child Matters' (be healthy, stay safe, enjoy and achieve, make a positive contribution, and enjoy economic well-being);
- Provide a learning environment where all individuals see themselves reflected and feel a sense of belonging;
- Prepare students for life in a diverse society in which children are able to see their place in the local, regional, national and international community.

6.1 Inclusion and Belonging

TCW recognises that students may experience multiple and overlapping barriers to participation, achievement and wellbeing.

These may include:

- disability or SEND;
- race, ethnicity or nationality;
- religion or belief;
- Sex;
- gender reassignment;
- sexual orientation;
- pregnancy or maternity;
- socio-economic disadvantage;
- care experience;
- family circumstances;
- Language;
- cultural background;
- medical needs;
- mental health or emotional wellbeing needs; and
- other individual circumstances.

Staff should avoid making assumptions about individuals or groups and should consider the individual circumstances of each student.

Where a student experiences barriers to participation, TCW will consider what reasonable and proportionate support can be provided.

6.2 Anti-Racism and Anti-Discrimination

TCW is committed to maintaining an actively anti-racist and anti-discriminatory culture.

- Racism and discrimination are not acceptable and will not be dismissed as:
- Banter;
- a joke;
- a difference of opinion;
- an isolated incident where the impact is significant; or
- behaviour that was not intended to cause offence.

Staff should consider both the behaviour and its impact.

TCW will seek to identify and address patterns of disproportionality, including where data indicates that particular groups may be experiencing poorer outcomes or greater barriers.

Staff should actively challenge discriminatory language and behaviour and report concerns through the appropriate systems.

Where discrimination may constitute a safeguarding concern, the Safeguarding and Child Protection Policy and relevant safeguarding procedures will apply.

Please see the Anti-Racism policy for more information.

6.3 Bullying, Harassment and Discriminatory Behaviour

TCW does not tolerate bullying, harassment or discriminatory behaviour.

This includes behaviour related to:

- Race;
- Disability;
- Sex;
- religion or belief;
- sexual orientation;
- gender reassignment;
- pregnancy or maternity;
- age in relation to staff;
- nationality or culture; and

other characteristics or circumstances where behaviour is prejudicial or harmful.

Examples may include:

- discriminatory language;
- racist abuse;
- homophobic or biphobic abuse;
- transphobic abuse;
- sexist behaviour;
- disability-related abuse;
- religious or belief-based abuse;
- Stereotyping;
- exclusion or social isolation;
- discriminatory online behaviour;
- harassment; and
- victimisation.

Incidents will be dealt with under the Anti-Bullying Policy, Behaviour Policy, Safeguarding and Child Protection Policy, Staff Code of Conduct or relevant HR procedure as appropriate.

7. Admissions and Education

TCW will operate admissions arrangements fairly and lawfully.

The school will not unlawfully discriminate against a child in:

- arrangements for admission;
- the terms on which admission is offered;
- access to education;
- access to benefits, facilities or services;
- exclusion; or
- other treatment by the school.

The Equality Act places specific duties on schools in relation to admissions and the provision of education.

TCW's Admissions Policy should be read alongside this policy.

TCW recognises that it may not always be possible to offer a placement where the school cannot safely or appropriately meet a student's needs, even after reasonable adjustments and appropriate support have been considered.

Such decisions must be based on the student's individual needs and the school's lawful duties rather than on assumptions about a protected characteristic.

8. Disability and Reasonable Adjustments

TCW recognises its legal duties towards disabled students, staff and applicants.

Where an individual is disabled, TCW will consider reasonable adjustments to avoid substantial disadvantages where required by law.

- Reasonable adjustments may include changes to:
- physical arrangements;
- Communication;
- working arrangements;
- assessment arrangements;
- recruitment processes;
- interview arrangements;
- access to information;
- teaching and learning;
- support arrangements; and
- school procedures.

Adjustments will be considered on an individual basis and will take account of the person's circumstances, the nature of the disadvantage and what is reasonable and proportionate.

TCW will work with students, parents/carers, staff and relevant professionals where appropriate to identify effective adjustments.

9. Religion and Belief

TCW respects individuals' religious and non-religious beliefs.

Students and staff should be treated respectfully regardless of whether they:

- practise a religion;
- hold a particular religious belief;
- hold a philosophical belief; or
- have no religious belief.

The school will seek to ensure that education and school life promote understanding and respect for different religions, beliefs and worldviews.

Reasonable requests relating to religion or belief will be considered appropriately, taking account of the school's educational, safeguarding and operational requirements.

10. Sex, Pregnancy and Maternity

TCW will not unlawfully discriminate against individuals because of sex, pregnancy or maternity.

Students and staff who are pregnant or returning from maternity leave will be treated with dignity and respect.

The school will consider reasonable and appropriate support, adjustments and risk management where required.

Sex-based differences in education, activities, facilities or opportunities will be considered in accordance with the Equality Act 2010, relevant exceptions and current statutory and regulatory guidance.

Where single-sex facilities or activities are provided, TCW will ensure that arrangements are lawful, proportionate and consistent with safeguarding, privacy and dignity requirements

11. Sexual Orientation

TCW will not unlawfully discriminate against anyone because of sexual orientation.

Homophobic and biphobic language, harassment, bullying or discriminatory behaviour will not be tolerated.

The curriculum and wider school environment should promote respectful relationships and prepare students for life in a diverse society in an age-appropriate manner.

12. Transgender Inclusion

TCW is committed to ensuring that students and staff who are questioning their gender or who have the protected characteristic of gender reassignment are treated with dignity and respect.

TCW recognises that gender identity can be a sensitive and complex matter and that students may require pastoral, safeguarding or other support.

The school will:

- listen respectfully to students;
- take concerns seriously;
- provide appropriate pastoral support;

- consider the individual circumstances of each student;
- consider the student's age, maturity and individual needs;
- consider safeguarding implications;
- consider the views and involvement of parents/carers where appropriate;
- consider relevant clinical or professional information where available and appropriate;
- maintain appropriate confidentiality;
- avoid unnecessary disclosure of sensitive personal information;
- challenge bullying, harassment and discriminatory behaviour;
- consider the impact on the individual student and other members of the school community; and
- keep arrangements under review.

12.1 Names and Pronouns

TCW will seek to treat students respectfully and sensitively in relation to names and pronouns.

Where a student asks to use a different name or pronouns, staff should respond sensitively and seek appropriate guidance where the situation raises safeguarding, welfare, parental or other concerns.

Staff should not make promises of absolute confidentiality where information may need to be shared to safeguard a child.

Where a proposed change raises safeguarding concerns, conflicts with the school's legal duties or requires wider consideration, the matter should be referred to the appropriate senior leader and/or Designated Safeguarding Lead.

12.2 Parents and Carers

TCW recognises the importance of parents/carers in supporting children.

Where a student raises concerns or requests support relating to gender identity, the school will consider whether and how parents/carers should be involved, taking account of:

- the student's age and maturity;
- safeguarding considerations;
- the student's welfare;
- family circumstances;
- any risk of harm;
- relevant professional advice; and
- the school's legal responsibilities.

Staff should seek advice from the Designated Safeguarding Lead or appropriate senior leader where there is uncertainty.

12.3 Records and Information

Changes to records will only be made where appropriate and in accordance with TCW's information management, safeguarding and data protection procedures.

Sensitive information relating to a student's gender identity will only be shared with those who have a legitimate reason to receive it.

12.4 Facilities

TCW will provide facilities in accordance with its legal and safeguarding responsibilities.

The school will ensure that students' privacy and dignity are protected and that arrangements relating to toilets, changing facilities and other sex-specific facilities comply with current legal requirements and guidance.

Individual requests will be considered sensitively and on a case-by-case basis.

12.5 Curriculum and Wider School Life

TCW will seek to ensure that students are able to participate safely and respectfully in school life.

The curriculum will address equality, respectful relationships and diversity in an age-appropriate manner and in accordance with statutory curriculum requirements.

13. Curriculum and Learning

TCW will promote equality and diversity through:

- curriculum content;
- teaching and learning;
- PSHE/RSE;
- Assemblies;
- Enrichment;
- student voice;
- pastoral support;
- school events; and
- the wider culture of the school.

Curriculum resources should:

- be age-appropriate;
- support respectful attitudes;
- avoid harmful stereotypes;
- represent diversity appropriately;
- challenge prejudice; and
- support students to understand and participate in a diverse society.
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Teaching about protected characteristics will be undertaken in accordance with statutory requirements and relevant curriculum guidance. Ofsted considers whether schools are teaching protected characteristics in an age-appropriate way.

14. Recruitment and Employment

TCW is committed to fair and inclusive recruitment and employment practices.

Recruitment and employment decisions will be based on the requirements of the role, candidates' suitability and the legitimate needs of the organisation.

TCW will:

- use fair and consistent recruitment processes;
- avoid discriminatory job requirements;
- provide reasonable adjustments where required;
- ensure interview questions relate to the role;
- avoid inappropriate questions about protected characteristics;
- monitor recruitment and employment data where appropriate;
- ensure promotion and development opportunities are fair;
- challenge discriminatory behaviour in the workplace;
- provide appropriate equality training; and
- consider positive action where lawful and appropriate.

The Safer Recruitment Policy sets out the school's detailed recruitment and selection arrangements.

Applicants and employees must not be disadvantaged because of a protected characteristic except where a lawful exception applies.

15. Positive Action

TCW may use lawful positive action where appropriate.

Positive action may be used where individuals who share a protected characteristic:

- experience a disadvantage;
- have particular needs; or
- are disproportionately under-represented.

Any positive action must comply with the Equality Act 2010 and must not involve unlawful discrimination.

Positive action will be considered on a case-by-case basis rather than through blanket policies.

16. Responsibilities

16.1 Trustees

In liaison with the CEO and Executive Headteacher, the trustees ensure TCWs equality duties are delivered and the considerations form part of a strategic governance.

16.2 Executive Headteacher and the Executive Team

The Executive Headteacher and the Executive Team are responsible for:

- implementing this policy;
- ensuring compliance with equality legislation;
- promoting an inclusive culture;
- monitoring equality-related information;
- challenging discriminatory practice;
- ensuring staff receive appropriate training;
- ensuring concerns are responded to appropriately; and
- reporting significant issues and relevant progress to trustees.

16.3 Head of Safeguarding and Wellbeing / DSL

The DSL and safeguarding team will consider whether equality-related concerns also constitute safeguarding concerns.

They will ensure that appropriate safeguarding procedures are followed where required.

16.4 Head of HR

The Head of HR is responsible for supporting the implementation of equality principles in recruitment, employment, training, employee relations and workplace practice.

16.5 All Staff

All staff are responsible for:

- treating others with dignity and respect;
- challenging discriminatory behaviour appropriately;

- avoiding discriminatory assumptions and stereotypes;
- promoting inclusion;
- reporting concerns;
- completing relevant training; and
- following this policy and associated procedures.

Where a concern may constitute a safeguarding matter, staff must report it without delay through the appropriate safeguarding procedure.

16.6 Students

Students are expected to:

- treat others with respect;
- avoid discriminatory language and behaviour;
- report bullying, harassment and discrimination;
- respect differences between individuals; and
- follow the Behaviour Policy and other relevant school expectations.

16.7 Parents/Carers

Parents/carers are encouraged to:

- support TCW's commitment to equality and inclusion;
- raise concerns appropriately;
- work constructively with the school; and
- model respectful behaviour.

17. Staff Training

TCW will provide staff with appropriate training to support their equality, inclusion and anti-discrimination responsibilities.

Training may include:

Equality Act responsibilities;
protected characteristics;
anti-racism;
unconscious bias and stereotyping;
disability and reasonable adjustments;
inclusive practice;
bullying and harassment;
LGBTQ+ inclusion;
transgender inclusion;
safeguarding and discrimination;
responding to discriminatory incidents; and
relevant changes in law and guidance.

Training requirements will be determined according to role and identified organisational need.

18. Reporting Concerns and Incidents

TCW encourages students, staff and parents/carers to report concerns about discrimination, harassment or bullying.

Students may report concerns to a trusted member of staff, teacher, counsellor, DSL or other appropriate adult.

Staff must report concerns in accordance with the relevant policy and procedure - reporting informally

is always the first step of our process.

Where appropriate, concerns will be recorded on MyConcern or another designated system.

Records should include:

- the nature of the concern;
- relevant information about the incident;
- actions taken;
- decisions made;
- the rationale for decisions;
- outcomes; and
- any follow-up required.

This approach is consistent with KCSIE 2026 expectations around recording safeguarding concerns, decisions, rationale and outcomes.

19. Concerns and Complaints

TCW will seek to resolve concerns promptly and appropriately.

Where a person believes they have experienced discrimination or harassment, they should raise the matter with an appropriate member of staff, ordinarily a member of the Senior leadership team of the school, an HR Coordinator or Officer or another manager.

Where a concern cannot be resolved informally, it may be progressed through the relevant formal procedure.

For parents/carers, complaints will be managed in accordance with the Complaints Policy, we always aim to resolve complaints informally in the first instance.

For staff, concerns may be addressed under the Grievance, Disciplinary or other relevant HR procedure.

Where an allegation concerns safeguarding, the Safeguarding and Child Protection Policy will take precedence where appropriate.

No person will be victimised for raising a genuine concern or supporting another person who has raised a concern.

20. Monitoring, Data and Equality Impact

TCW will monitor equality, inclusion and diversity as part of its ongoing quality assurance and safeguarding work.

Where appropriate, the school will monitor data including:

- Admissions;
- referrals and placements;
- Attendance;
- exclusions and suspensions;
- behaviour incidents;
- bullying incidents;
- discriminatory incidents;
- safeguarding concerns;

- Complaints;
- academic progress and outcomes;
- access to enrichment and wider opportunities;
- Recruitment;
- Applications;
- Appointments;
- staff development;
- staff retention; and
- other relevant workforce information.
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Where lawful and appropriate, data may be considered by relevant protected characteristic or other relevant demographic factors.

The purpose of monitoring is to identify:

- potential disadvantage;
- Disproportionality;
- barriers to participation;
- differences in outcomes;
- recurring patterns;
- emerging risks; and
- areas where further action may be required.

Data will be interpreted carefully and will not automatically demonstrate discrimination or causation. Where monitoring identifies a concern, TCW will consider proportionate actions to understand and address the issue

21. Visitors, Contractors and External Professionals

Visitors, contractors and external professionals working with TCW are expected to treat students and staff with dignity and respect and to comply with relevant TCW policies.

Discriminatory, harassing or prejudicial behaviour by visitors or contractors will not be tolerated. Where concerns arise, TCW may take appropriate action, including restricting access to TCW premises or terminating arrangements where lawful and appropriate.

22. Confidentiality and Information Sharing

TCW will handle equality-related personal information sensitively and in accordance with its Data Protection and Privacy policies.

Confidentiality cannot be guaranteed where information needs to be shared to:

- safeguard a child;
- protect another person;
- comply with a legal obligation;
- manage a serious concern; or
- fulfil another lawful responsibility.

Where safeguarding concerns arise, data protection will not be treated as a barrier to appropriate information sharing. KCSIE 2026 expressly reinforces that data protection should not prevent necessary safeguarding information sharing.

23. Monitoring and Review

This policy will be monitored on an ongoing basis to assess its effectiveness and identify any areas requiring further action.

The policy will be formally reviewed at least annually, or earlier where there are:

- significant legislative changes;
- changes to statutory guidance;
- relevant developments in case law;
- changes to regulatory expectations;
- significant incidents or emerging risks; or
- changes to TCW's organisational arrangements.

The Director of Operations and Head of HR will coordinate the review, with input from relevant senior leaders and safeguarding staff.

24. Monitoring and Review

This policy is monitored on an ongoing basis to evaluate its effectiveness and ensure appropriate steps can be taken to eliminate unlawful discrimination.

If you have any suggestions or comments regarding this policy, please email suggestions@tcw.org.uk

Policy	Equality, Inclusion and Diversity Policy
Date of Approval	May 2022
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Review 1:	June 2023
Approved by:	Adam Dalton
Review 2:	June 2024
Approved by:	Adam Dalton
Review 3:	June 2025
Approved by:	Adam Dalton

Appendix 1

The legal and local framework for this policy is:

- Race Relations Act 1976 (as amended in 2000)
- Race Relations Act (Statutory Duties) Order 2001;
- Disability Discrimination Act 1995 (as amended in 2005)
- Children Act 2004
- Equality Act 2010
- Education and Inspections Act 2006
- Duty to Promote Community Cohesion, Education and Inspections Act 2006
- Race Relations Act 1976;
- Sex Discrimination Act (Public Authorities) (Statutory Duties) Order 2006;
- Employment Equality (Religion and Belief) Regulations 2003;
- Employment Equality (Sexual Orientation) Regulations 2003;
- Employment Equality (Age) Regulations 2006.

For further guidance refer to the Equality and Human Rights Commission (URHC)

