

INCLUSIVE | MULTI ACADEMY TRUST

DIVERSITY, EQUITY AND INCLUSION POLICY AND PLAN

DOCUMENT DETAIL

Approving Body	Trust Board
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Summary

This policy was developed in partnership with Diverse Educators. It formalises current practices and sets out a comprehensive framework for promoting equality across the Trust's schools.

Statutory Changes

- The Worker Protection (Amendment of Equality Act 2010) Act 2023
- Updated Protected Characteristics definitions (Appendix A)

Key Policy Updates

- Intersectionality - acknowledging multiple minority identities
- New Head of HR and Line Manager responsibility sections
- Mandatory manager and staff training requirements
- Enhanced discrimination definitions (including associative and perception discrimination)
- Stricter breach procedures and comprehensive monitoring requirements
- Clearer reporting processes

The policy emphasises both legal compliance with the Equality Act 2010 and practical steps to foster an inclusive environment where everyone can thrive.

For the purpose of this policy, the term school and schools refer to schools that are part of the Inclusive Multi Academy Trust

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Statement of intent

At the Inclusive Multi Academy Trust inclusion is our heartbeat. We are a family of schools where:

- happy children and young people learn
- happy staff thrive
- happy people build communities

Everyone belongs!

We promise that people in our Trust will:

- experience a sense of **belonging, dignity and equity**
- feel **safe**, socially, emotionally and physically
- develop outstanding academic and life **skills**
- foster an intrinsic **love of learning** whilst having fun
- build lasting, healthy **relationships** and support networks
- engage with and contribute substantially to their local and global **community**

The Inclusive Multi Academy Trust is committed to promoting equality of opportunity for all staff and job applicants. We aim 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. We are committed to supporting our staff and applicants to be their authentic selves in the workplace without judgement and ensuring that diverse communities are celebrated. We are creating a workplace culture in which diversity and inclusion is valued, and everyone is treated with dignity and respect.

As part of our zero tolerance approach to discrimination, all staff and any job applicants will receive equal treatment regardless of age, disability, gender reassignment, marital or civil partner status, pregnancy and maternity, race, religion or belief, sex, and sexual orientation (the protected characteristics), as identified in the Equality Act 2010. More detail on each of the protected characteristics can be found in Appendix A.

We are also mindful of intersecting identities within our school environment and will work with our communities to better understand the experience of multiple minority identities for individuals.

This policy brings together all previous policies, schemes and action plans around equality. It includes all the protected characteristics covered under the Equality Act 2010 as well as other aspects which have the potential to discriminate against or devalue any individuals within our community.

All staff have a duty to act in accordance with this policy and treat colleagues with dignity at all times. The principles of non-discrimination and equity of opportunity also apply to how staff treat pupils, parents, trustees, governors, third party organisations and former staff members.

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

This policy covers all individuals working at all levels and grades, including members of the SLT, teachers, TAs, support staff, office staff, site staff, trainees, part-time and fixed-term employees, volunteers, casual workers, and agency staff (collectively referred to as 'staff' in this policy).

The following statement summarises our commitment to Diversity, Equity, Inclusion and Belonging

“We strive for equity and equality through encouraging and respecting diversity, challenging discrimination and holding courageous conversations.”

Legal framework

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

- Protection from Harassment Act 1997
- Human Rights Act 1998
- Equality Act 2010
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Education and Inspections Act 2006
- The Worker Protection (Amendment of Equality Act 2010) Act 2023

This policy operates in conjunction with the following school policies:

- Grievance Policy
- Disciplinary Policy and Procedure
- Appraisal Policy
- Safer Recruitment Policy

Public Sector Equality Duty (PSED)

The PSED requires public bodies to have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010.
- Advance equality of opportunity between people who share a protected characteristic and people who do not share it.
- Foster good relations between people who share a protected characteristic and people who do not.

Principles underlying this policy

In accordance with this policy and all related legislation and guidance, the Trust commits to:

- Creating a working environment free of bullying, harassment, victimisation and unlawful discrimination, where individual differences and the contributions of all staff are recognised and valued.
- Applying the principles of equity to all staff and all job applicants so that there is equality of opportunity. Our aim is that no individual is denied employment opportunities for reasons unrelated to ability.
- Establish programmes and processes that ensure a diversity of candidates at all career stages beginning with recruitment, including the development and promotion of talent through to the appointment of senior leadership.
- Make reasonable adjustments to enable employees with disabilities to function effectively and to their full potential.
- Implementing all internal policies and procedures on a fair and impartial basis.
- Promoting dignity and respect for all.
- Training managers and all other employees about their rights and responsibilities under this policy.
- Monitor how this policy is working in practice.

This policy applies to all aspects of the Trust's relationship with staff and to relations between staff members at all levels. This includes job advertisements, recruitment and selection, training and development, opportunities for promotion, conditions of service, flexible working and leave, pay and benefits, conduct at work, disciplinary and grievance procedures, and termination of employment.

Instances of bullying, harassment, victimisation and unlawful discrimination will be dealt with as misconduct, in line with the Trust's Grievance Policy and/or Disciplinary Policy and Procedure, and appropriate action will be taken. Particularly serious complaints could amount to gross misconduct and lead to dismissal without notice.

Sexual harassment may amount to both an employment rights matter and a criminal matter, such as in sexual assault allegations. Harassment under the Protection from Harassment Act 1997 – which is not limited to circumstances where harassment relates to a protected characteristic – is a criminal offence.

Forms of discrimination

No person or body must unlawfully discriminate against or harass other people, including current and former staff members, job applicants, pupils, parents, contractors, volunteers and visitors. This applies within the school, outside of school and on school related trips or events including social events.

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

Direct discrimination occurs where someone is treated less favourably because of one or more of the protected characteristics. For example, rejecting an applicant on the grounds of their race because they would not "fit in" would be direct discrimination. Direct discrimination can include associative discrimination, where a person is treated less favourably because of their association with an individual with a protected characteristic, and perception discrimination, where a person is treated less favourably because of the mistaken belief that they possess a protected characteristic.

Indirect discrimination occurs where someone is disadvantaged by a provision, criterion or practice that also puts other people with the same protected characteristic at a particular disadvantage. For example, a requirement to work full time puts women at a particular disadvantage because they generally have greater childcare commitments than men. Such a requirement will be discriminatory unless objectively justified.

Harassment related to the protected characteristics of age, disability, gender reassignment, race, religion or belief, sex and sexual orientation is prohibited. Harassment including sexual 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.

Victimisation is also prohibited. This is where someone suffers a detriment because they have done a "protected act" or it is believed they may do a protected act. A protected act is bringing proceedings under the Equality Act 2010, giving evidence or information in connection with proceedings under the Equality Act 2010, doing any other thing for the purposes of or in connection with the Equality Act 2010 and/or alleging that the Trust or another person has contravened the Equality Act 2010.

Disability discrimination 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.

Roles and responsibilities

Whilst individual responsibilities have been ascribed to specific roles, everyone involved with the Trust at any level will adhere to the principles of this policy.

The Trust Board will:

- Ensure the effective operation of this policy
- Ensure compliance with discrimination law
- Assess how this policy and supporting action plans work in practice
- Review annually and take action to address issues
- Monitor workforce composition regarding protected characteristics
- Monitor how the composition of the workforce encourages equality, equity, diversity and inclusion, and meets the aims and commitments set out in this policy.

The School Governing Committees will:

- Monitor policy effectiveness at school level
- Ensure compliance with discrimination law
- Review supporting action plans
- Monitor school workforce composition
- Support the Headteacher in implementation

The Headteacher will:

- Implement and champion this policy

- Ensure fair application in all situations
- Review employment practices and procedures where necessary to ensure fairness.
- Ensure appropriate support for pupils requiring interventions
- Lead by example in fostering an inclusive culture

The SLT will:

- Set an appropriate standard of behaviour and lead by example.
- Ensure that those they manage adhere to this policy and promote the Trust's aims and objectives with regard to equal opportunities.
- Take appropriate steps to accommodate the requirements of different religions, cultures, and domestic responsibilities.
- Make opportunities for training, development and progress available to all staff.
- Ensure staff are helped and encouraged to develop their full potential, so their talents and resources can be fully utilised to maximise the efficiency of the organization.
- Participate in appropriate training on equal opportunities awareness and equal opportunities recruitment and selection good practice.
- Make staff progression decisions based on merit (apart from in any necessary and limited exemptions and exceptions allowed under the Equality Act 2010).

All staff will:

- Conduct themselves to help provide equal opportunities in employment, and prevent bullying, harassment, victimisation and unlawful discrimination.
- Understand that they, as well as their employer, can be held liable for acts of bullying, harassment, victimisation and unlawful discrimination, in the course of their employment, against their colleagues, customers, suppliers, visitors and the public.
- Take seriously complaints of bullying, harassment, victimisation and unlawful discrimination by their colleagues, customers, suppliers, visitors, the public and any others in the course of the Trust's work activities.

Pupils will:

- Be expected to treat all members of the school community with respect and dignity
- Support and celebrate diversity within the school
- Challenge discrimination, prejudice and disrespectful behaviour
- Participate in activities that promote understanding of different groups
- Report any incidents of bullying, harassment or discrimination
- Contribute to creating an inclusive school environment where everyone feels welcome
- Take part in learning opportunities about equality and diversity

Recruitment and selection

Recruitment, promotion, and other selection exercises such as redundancy selection will be conducted on the basis of merit, against objective criteria that avoid discrimination. When recruiting or promoting, we will aim to take steps to improve the diversity of our workforce and provide equality of opportunity.

The Trust will aim to ensure that no job applicant suffers discrimination because of any of the protected characteristics. The Trust's recruitment procedures will be reviewed regularly to ensure that individuals are treated on the basis of their relevant merits and abilities. Job selection criteria will be regularly reviewed to ensure that it is relevant to the job and not disproportionate. The shortlisting of applicants will be done by more than one person wherever possible.

Job advertisements will avoid stereotyping or using wording that may discourage groups with a particular protected characteristic from applying. The Trust will take steps to ensure that vacancies are advertised to a diverse labour market.

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.

Our recruitment procedures, managed through an automated and anonymised recruitment platform, ensure a truly fair and unbiased selection process. This platform removes identifying information before applications reach the hiring panel, allowing decisions to be made solely on merit and relevant abilities.

We will take steps to ensure that:

- Advertisement wording avoids stereotyping or discouraging any particular group from applying
- Shortlisting is conducted through our anonymous platform, removing unconscious bias from initial selection
- Multiple people review applications to ensure balanced decision-making
- Job advertisements encourage applications from all qualified candidates

Health and Disability: Applicants will not be asked about health or disability before a job offer is made, except in the limited circumstances allowed by law:

- Questions necessary to establish if an applicant can perform an intrinsic part of the job
- Questions to establish if any reasonable adjustments are needed for the assessment process
- Positive action to recruit disabled persons
- Equal opportunities monitoring (which will not form part of the decision making process)

Right to Work: The Trust is required by law to ensure all staff are entitled to work in the UK. We will:

- Not make assumptions about immigration status based on appearance or nationality. All prospective employees, regardless of nationality, will be expected to produce original documents. The list of acceptable documents is available from the UK Visas and Immigration.

Monitoring: Our anonymous recruitment platform helps ensure this policy operates effectively by:

- Monitoring applicants' ethnicity, gender, disability, sexual orientation, religion and age as part of the recruitment procedure. This is to ensure that this policy is operating effectively, and to identify groups that may be underrepresented or disadvantaged in our organisation,
- Provision of this information will be voluntary and will not adversely affect an applicant's chances of recruitment, or any other decision related to their employment.
- The information will be removed from applications before the shortlisting process and will be kept in an anonymised format solely for the purposes stated in this policy and in accordance with data protection legislation.
- Analysing this data helps the Trust take appropriate steps to avoid discrimination and improve equality and diversity.

Staff training and promotion and conditions of service

Staff will be given appropriate training on recognising and avoiding discrimination, harassment, victimisation, unconscious bias and promoting equality of opportunity and diversity.

Staff training needs and associated development opportunities will be identified through regular staff appraisals, in line with the Trust's Appraisal Policy. All staff will be given appropriate access to training to enable them to progress within the organisation and all promotion decisions will be made based on merit. The Trust will adopt good practice in terms of data collection and use this data to monitor and measure the attraction, recruitment, retention and progression of staff.

Workforce composition and promotions will be regularly monitored to ensure equality of opportunity at all levels of the organisation. Where appropriate, steps will be taken to identify and remove unjustified barriers and to meet the needs of disadvantaged or underrepresented groups.

The school's conditions of service, benefits and facilities are reviewed regularly to ensure that they equal opportunities for all and that there are no unlawful obstacles to accessing them.

Data Collection and Analysis for Equality Monitoring

The Trust takes a systematic approach to gathering equality, diversity and inclusion information to inform our decision-making and measure our progress. This data collection forms a key part of our people strategy.

Staff Data We collect information through:

- Annual dedicated DEI staff survey through Edurio
- Regular staff satisfaction surveys which include DEI monitoring questions
- Recruitment and retention monitoring
- Training needs analysis
- Exit interviews

All data collection is voluntary, anonymous where possible, and handled in accordance with data protection regulations.

Pupil Data We monitor pupil data across protected characteristics to:

- Track educational outcomes
- Identify any gaps in achievement
- Monitor behaviour and attendance patterns
- Evaluate participation in school activities
- Inform intervention strategies

Parent Voice All parent surveys include DEI monitoring questions, allowing us to:

- Understand the needs of different community groups
- Identify any barriers to engagement
- Monitor satisfaction levels across different groups
- Target support and communication effectively

Governance Trustees and governors are asked to provide DEI monitoring information to:

- Ensure diverse representation at leadership level
- Identify gaps in representation
- Inform recruitment/succession strategies
- Monitor progress against our objectives

Using the Data This comprehensive data collection enables us to:

- Make evidence-based decisions about training needs
- Target recruitment to increase diversity
- Identify areas requiring intervention
- Measure the impact of our DEI initiatives
- Report progress to stakeholders
- Set meaningful objectives for improvement

Termination of employment

The Trust will ensure that redundancy criteria and procedures are fair and objective and not directly or indirectly discriminatory. We will also ensure that disciplinary procedures and penalties are applied without discrimination, in line with this policy and our Disciplinary Policy.

Disability discrimination

The Trust encourages staff who are disabled or become disabled to inform their line manager or the headteacher about their condition so appropriate support can be provided.

Staff experiencing difficulties at work because of their disability (physical or otherwise) may:

- Contact their line manager to discuss reasonable adjustments
- Request a meeting to explore what support could help overcome or minimise difficulties
- Have their line manager consult with medical advisers about possible adjustments

The Trust will consider the matter carefully and try to accommodate the staff member's needs within reason. If the Trust considers a particular adjustment would not be reasonable, we will explain our reasons and try to find an alternative solution where possible.

The School Governing Committee will:

- Monitor the physical environment of school premises
- Consider whether any features place disabled staff, job applicants, or stakeholders at a substantial disadvantage
- Take reasonable steps to improve access for disabled staff and service users
- Ensure workplace adaptations are made wherever reasonable to support staff with disabilities

Part-time, zero hours, and fixed-term employees and agency workers

The Trust will:

- Monitor conditions of service for part-time employees and their progression
- Ensure appropriate access to benefits and training opportunities
- Handle requests to alter working hours fairly
- Monitor use of zero hours and fixed-term employees and agency workers and their conditions of service
- Ensure fair access to benefits, training, promotion and permanent employment opportunities where appropriate
- Track progress towards permanent vacancies where relevant

Breaches of this policy

The Trust takes a strict approach to breaches of this policy, which will be dealt with in accordance with our Disciplinary Policy and Procedure. Serious cases of deliberate discrimination and victimisation may amount to gross misconduct resulting in dismissal.

If a staff member believes they have suffered harassment, bullying or discrimination, or witnessed it happening to someone else in the workplace, please raise the matter with the appropriate senior employee or under the Grievance Procedure as appropriate.

Allegations regarding potential breaches of this policy will be treated in confidence and investigated in accordance with the relevant procedure. The Trust encourages the reporting of all types of potential discrimination, as this assists with ensuring that diversity, equity and inclusion principles are adhered to in the Trust. Staff 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 our Disciplinary Policy.

Any member of staff who is found to have committed an act of discrimination or harassment may be subject to disciplinary action. Such behaviour may constitute gross misconduct and, as such, may result in summary dismissal. The Trust takes a strict approach to serious breaches of this policy.

Monitoring and review

This policy will be reviewed annually. The Trust will continue to review the effectiveness of this policy to ensure it is achieving its objectives and identify areas in which further resources or support are required to achieve equality of experience. As part of this process, the Trust will monitor the composition of job applicants and the benefits and career progression of staff. We will also monitor 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.

Appendix A: Equality Act 2010 Protected Characteristics

The definitions used in this appendix are based on the Equality Act 2010, the full text of which is available [here](#).

Age: The Act protects people of all ages; however, differential treatment because of age is not unlawful direct or indirect discrimination if it can be justified, i.e. if you can demonstrate that it is a proportionate means of achieving a legitimate aim. Age is the only protected characteristic that allows employers to justify direct discrimination.

Disability: The Act protects people who are disabled; the Act defines this as someone who has a physical or mental impairment which has a substantial and long term adverse effect on their ability to carry out normal day to day activities.

Gender identity and/or reassignment: The Act protects people who are proposing to undergo, undergoing or have undergone a process (or part of a process) for the purpose of reassigning the person's sex.

Marriage and civil partnership: The Act protects people who are married or in a civil partnership against discrimination. Marriage covers any formal union which is legally recognised in the UK as a marriage. Therefore, marriage between a man and a woman and between a same sex couple are covered. A civil partnership can be between same sex partners, opposite sex partners.

Pregnancy and maternity: The Act protects people against discrimination on the grounds of pregnancy and maternity during the period of their pregnancy and any maternity leave to which they are entitled either statutory or contractual.

Race: The Act protects people of all races; the Act's definition of race includes colour, nationality, and ethnic or national origins.

Religion or belief: The Act protects people of any religion, including specific denominations or sects, as well as a lack of religion, i.e. employees or jobseekers who do not follow a certain religion or do not follow any religion are protected. The Act protects people of any belief; this is defined as any religious or philosophical belief, or a lack of such belief.

Sex: There is no definition of "sex" in the Equality Act; however, a reference to a person who has a protected characteristic is a reference to a man or to a woman.

Sexual orientation: The Act protects people's sexual orientation towards persons of the same sex; persons of the opposite sex or persons of either sex.

Appendix B: Inclusive Multi Academy Trust Equity Plan 2025/26

Our Trust aim is for all children, staff and parents to identify with the statement: **"We strive for equity and equality through encouraging and respecting diversity, challenging discrimination and holding courageous conversations."**

Following recognition as the first MAT nationally to achieve Nurturing Schools accreditation across all schools and winning the 2025 MAT Excellence EDI Award, this plan focuses on embedding sustainable practice, expanding influence, and ensuring that our commitment to diversity, equity and inclusion continues to drive excellence across our Trust and beyond. This links directly to the Trust priorities.

1. Culture: Bold conversations, authentic inclusion

Objective	Action	Evidence/outcomes
Establish regular "Brave Space" forums for staff and children	Embed brave spaces as routine practice with whole trust events	Event records and attendance Themes discussed and actions documented
Develop Trust wide training programme for DEI	Deliver comprehensive DEI training for all staff whilst providing support and training to other trusts on inclusive leadership	Staff completion rates and confidence measures Number of external organisations supported Sector testimonials and feedback
Create mechanisms for sharing diverse perspectives and experiences	Continue community voice events and shared assemblies whilst sharing learning through National EdTech Partnership, CST conferences and Parliamentary discussions	Community event attendance and feedback Speaking engagement records and reach Policy influence documented Published resources from presentations
Create mechanisms for sharing diverse perspectives and experiences	Establish DEI middle leader roles to build sustainable capacity and distribute leadership across schools	Role descriptions and appointments Middle leader development programme Leadership pipeline strengthened DEI work distributed not dependent on individuals

2. Diversity: Different voices, shared success

Objective	Action	Evidence/outcomes
Develop a comprehensive cultural calendar celebrating diversity	Expand cultural calendar representing cultures across the Trust	Calendar of events and participation rates Family feedback in multiple languages
Review and enhance curriculum representation	Complete comprehensive curriculum representation audit and publish findings as sector leading practice	Updated schemes of work implemented Resources shared with other schools Pupil voice showing increased representation
Review and enhance curriculum representation	Develop Trust wide curriculum resources showcasing diverse voices and perspectives	Resource bank established and shared Staff training on using resources Impact on pupil understanding of diversity
Create partnerships with diverse community organisations	Expand community partnerships and partners eg- National EdTech Partnership and Belong Effect	Partnership agreements and events Tools piloted with impact data Case studies published

3. Dignity: Clear standards, strong response

Objective	Action	Evidence/outcomes
Evaluate and standardise clear reporting and response procedures	Complete implementation of standardised procedures with all staff trained and share transparent monitoring approach	Written procedures and training completed Incident logs and resolution data Annual report published
Evaluate and standardise clear reporting and response procedures	Support the development of Nurturing Trust accreditation framework with Nurture UK	Proposal submitted and consulted on Framework development progressing Potential pilot identified
Develop pupil leadership programme focused on equality	Establish pupil equality ambassadors programme across all schools	Programme structure and participation Pupil voice surveys showing impact Student confidence in challenging discrimination
Develop strategies to address and challenge prejudice within our parent community	Deliver parent workshop programme on cultural understanding, online safety and digital dignity for multilingual families	Workshop programme and attendance Parent feedback in multiple languages Changes in community concerns data Community testimonials
Develop strategies to address and challenge prejudice within our parent community	Lead national conversations on digital dignity through National EdTech Partnership, developing framework on ethical technology use	Speaking engagements delivered Sector adoption of concepts Policy influence on ethical EdTech

4. Equity: Fair systems, measurable impact

Objective	Action	Evidence/outcomes
Develop targeted recruitment strategies to increase workforce diversity	Monitor workforce progression by protected characteristics, make reasonable adjustments for disabled staff, and use data to support recruitment	Progression and retention data analysed Adjustments made with impact measured Employment equity demonstrated
Monitor educational outcomes by protected characteristics	Continue systematic monitoring through Edurio surveys, expand to include intersectionality questions	Achievement gap analysis showing progress Enhanced survey design and insights
Audit accessibility of facilities, curriculum, and communications	Complete accessibility audits and pilot AI translation and voice to text tools as equity enablers, sharing evaluation methodology with sector	Audit action plans progressing Pilot impact data on EAL and SEND learners Evaluation framework published EdTech partnerships established
Audit accessibility of facilities, curriculum, and communications	Establish research partnership with National Pedtech Partnership	Data collection and analysis underway Publications or reports in development