# EFSPT Equality Information and Objectives Policy

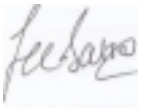
| | |
|---|---|
| Policy Owner | Trust Operations Manager |
| Senior Policy Owner | CEO |
| Ratified by the Board of Trustees on | 14th July 2022 |
| Signed by the Chair of Trustees |  |
| This Policy will be reviewed by the Trust every three years. Next review date: | July 2025 |
| Policy Origin | The School Bus |

**Table of Contents**


| Section | Content | Page No. |
|---|---|---|
| | **Statement of Intent** | 3 |
| 1 | Legal Framework | 4 |
| 2 | Roles and Responsibilities | 4 |
| 2.1 | The governing board | 5 |
| 2.2 | The CEO | 5 |
| 2.3 | Employees | 5 |
| 3 | Equality Objectives | 5 |
| 4 | Collecting and using information | 6 |
| 5 | Publishing information | 7 |
| 6 | Addressing prejudice-related incidents | 7 |
| 7 | Complaints Procedure | 7 |
| 7 | Monitoring and Review | 7 |
| | | |
| Appendix A | Equality Impact Assessment | 9 |
| Appendix B | Equality Objectives | 13 |

## Statement of intent

Epping Forest Schools Partnership Trust (the Trust) recognises that certain groups in society can be disadvantaged because of unlawful discrimination they may face due to their race, sex, disability, gender reassignment, marriage or civil partnership, religion or belief, sexual orientation, age, or pregnancy and maternity.

The Trust has a statutory duty to publish an Equality Information and Objectives Statement. This policy sets out how the Trust determines its equality objectives.

As a Trust we will continuously strive to ensure that everyone is treated with respect and dignity. Every person in our schools will be given fair and equal opportunities to develop their full potential regardless of their gender, ethnicity, cultural and religious background, sexuality, disability or special educational needs and ability.

The Trust will work actively to promote equality and foster positive attitudes and commitment to an education for equality. Please note that some points within this Policy may not be applicable to the Special School in our Trust.

The information below is a summary of how the Trust has due regard to the need to eliminate discrimination, harassment and victimisation.

- The Trust are aware of the requirements of the Equality Act 2010 that it is unlawful to discriminate, treat some people less fairly or put them at a disadvantage
- All Members and Trustees have been briefed on their legal responsibilities under the Equality Act 2010, and have also been involved in supporting all our schools to meet its public sector equality duty
- The Trust will develop IT solutions to collect information to produce a Trust profile of our pupils and employees to inform future decisions
- Each of our schools' Behaviour Policies outlines the Trust's expectations of both pupils and staff in their interactions with each other, including their approach to tackling bullying and prejudice
- Each of our schools deals promptly and effectively with all incidents and complaints of bullying and harassment
- Each school keeps a record of all such incidents and will notify those affected of what action has been taken
- Training is provided to all staff in relation to dealing with bullying and harassment incidents
- Each school has a Special Educational Needs and Disabilities Policy that outlines the provision the school makes for pupils with special educational needs
- Our Complaints Policy sets out the procedures through which complaints are dealt with
- The Trust will observe and implement the principles of equal opportunities and non-discrimination in its employment practices
- The Trust pays due regard within its recruitment practices, to safeguarding and protecting its pupils
- Procedures are in place for addressing staff discipline, conduct and grievances
- The Trust will engage and consult with pupils, staff, parents and carers, and the local community, in order to develop its awareness of equality issues, review the impact of the Trust's policies, set equality objectives and improve what we do

Each school has their own Equality Statement and Objectives Policy which should be referred to for school specific information.

## 1. Legal framework

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

- Human Rights Act 1998
- The Special Educational Needs and Disability Regulations 2014
- Education and Inspections Act 2006
- Equality Act 2010
- The Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017
- Public Sector Equality Duty (PSED)
- Data Protection Act 2018
- The UK General Data Protection Regulation (GDPR)

This policy also has due regard for non-statutory guidance, including the following:

- DfE (2014) 'The Equality Act 2010 and schools'

This policy operates in conjunction with the following Trust policies:

- Admissions Policy (each school has its own Admissions Policy)
- Complaints Procedures Policy
- Grievance Policy
- Data Protection Policy

The Equality Act 2010 provides a modern, single legal framework with three broad duties:

- Eliminate discrimination harassment and victimisation
- Advance equality of opportunity
- Foster good relations

For the purpose of this policy, the Equality Act 2010 will be referred to as 'the Act'. The Trust fully understands the principles of the Act and the work needed to ensure that those with protected characteristics are not discriminated against and are given equal opportunities. Protected characteristics, under the Act, are as follows:

- Age
- Disability
- Race, colour, nationality or ethnicity
- Sex
- Gender reassignment
- Maternity and pregnancy
- Religion and belief
- Sexual orientation
- Marriage and civil partnership

The Act makes it unlawful for the responsible body of a Trust to discriminate against, harass or victimise a pupil or potential pupil:

- In relation to admissions.
- In the way it provides education for pupils.
- In the way it provides pupils access to any benefit, facility or service.
- By excluding a pupil or subjecting them to any other detriment.

The responsible body for the school is the proprietor.

The Trust's liability not to discriminate, harass or victimise does not end when a pupil has left the school, but will apply to subsequent actions connected to the previous relationship between school and pupil, such as the provision of references on former pupils or access to former pupils' communications and activities.

Trust will promote equality of opportunity for all staff and job applicants.

## 2. Roles and responsibilities

### 2.1 The Trust Board

The Trust Board will:

- Ensure that the Trust complies with the appropriate equality legislation and regulations.
- Meet its obligations under the PSED to:
  - Publish equality objectives at least every four years commencing on the date of the last publication.
  - Update and publish information every year to demonstrate Trust compliance with the PSED.
- Ensure that the Trust's policies and procedures are developed and implemented with appropriate equality impact assessments (appendix A for a template) informing future plans.
- Ensure that the school's Admissions Policy does not discriminate in any way.
- Ensure equal opportunities in its staff recruitment and promotion practices, professional development programmes and in membership of the governing board.
- Proactively recruit high-quality applicants from under-represented groups.
- Provide information in appropriate and accessible formats.
- Ensure that the necessary disciplinary measures are in place to enforce this policy.

### 2.2 The CEO

The CEO will:

- Implement and champion this policy and its procedures.
- Ensure that all staff members receive the appropriate equality and diversity training as part of their induction and CPD.
- Actively challenge and take appropriate action in any case of discriminatory practice.
- Address any reported incidents of harassment or bullying in line with DfE guidance.
- Produce an annual report on the progress of implementing the provisions of this policy and report it to the governing board.

### 2.3 Employees

Employees will:

- Be mindful of any incidents of harassment or bullying in the Trust.
- Track and monitor any instances of discrimination and deal with these in a consistent manner, making a report to the CEO as necessary and following up with relevant persons as required.
- Promote equality and good relations, and not harass or discriminate in any way.
- Keep up-to-date with equality legislation and its application by attending the appropriate training.
- Champion diversity and inclusion.

The Trust will have an equality page on its website, in order to demonstrate how it is complying with the PSED in the Equality Act 2010, and advancing equality of opportunity.

## 3. Equality objectives

The Trust is committed to promoting the welfare and equality of all its staff, pupils and other members of the Trust community.

The Trust sees all members of the Trust community as of equal value, regardless of any protected characteristic. The Trust's policies, procedures and activities will not discriminate but must nevertheless take account of differences in life experience, outlook and background, and in the kinds of barriers and disadvantages which people may face in relation to any protected characteristic.

This policy sets out how the Trust is meeting the PSED and outlines how equality of opportunity is ensured for all members of the Trust community. The Equality Information and Objectives Statement is reviewed at least every four years and is published on the Trust website annually.

The Trust will consult with stakeholders to establish equality objectives and draw up a plan based on information collected on protected groups and accessibility planning.

To achieve this, the Trust has established the following objectives:

- promotion of cultural understanding and awareness of different religious beliefs between different ethnic groups within our school community and beyond
- monitoring and promotion of the involvement of all groups of pupils in the extra-curricular life of the school, including leadership opportunities, especially pupils with special educational needs and disabilities
- actively close gaps in attainment and achievement between 'disadvantaged' pupils and all groups of pupils
- actively monitor the attainment and achievement of pupils with special educational needs and disabilities, looked after children and pupils from minority ethnic groups. Ensure that attainment is as good or better than similar groups of pupils nationally
- continue to improve accessibility across the school for pupils, staff and visitors with disabilities, including access to specialist teaching areas
- endeavour to ensure that the staff body and representation of staff in leadership roles is reflective of the local community
- eliminate the use of sexist and racist language by pupils in the school and phobic language relating to gender perception

The Trust will regularly review the steps being taken and the progress made towards the achievement of these objectives and, in line with the specific duties of the PSED. See Appendix B for the Trust's Equality Objectives.

## 4. Collecting and using information

In accordance with the requirements outlined in the UK GDPR and Data Protection Act 2018, personal data will be lawfully collected and processed in line with the principles and practices outlined in the Data Protection Policy and only for specified, explicit and legitimate purposes, e.g. to comply with the Trust's legal obligations.

The Trust will collect equality information for the purpose of:

- Identifying key issues, e.g. unlawful discrimination in teaching methods.
- Assessing performance, e.g. benchmarking against similar organisations locally or nationally.
- Taking action, e.g. adapting working practice to accommodate the needs of staff who share protected characteristics.

The Trust will build an equality profile for staff to assist with identifying any issues within their recruitment regime. The Trust will obtain the following information from their staff:

- Recruitment and promotion
- Numbers of part-time and full-time staff
- Pay and remuneration
- Training
- Return to work of staff members on parental leave
- Return to work of disabled employees following sick leave relating to their disabilities
- Appraisals
- Grievances (including about harassment)
- Disciplinary action (including for harassment)
- Dismissals and other reasons for leaving

The Trust will use the information it obtains to analyse any gaps present in its equality documentary.

## 5. Publishing information

The Trust will publish information to demonstrate its compliance with the Act. The Trust will publish information relating to people within the Trust community who share relevant protected characteristics, including:

- The Trust's employees.
- People affected by the Trust's policies and procedures.

The Trust will not provide this information if:

- The employee is employed under contract personally to do work.
- The employer does not have this information, and it is not reasonably practicable for the employer to obtain the data.

The Trust will publish findings in its annual report.

The Trust will publish the following information annually with regard to the gender pay gap:

- The difference between the mean hourly rate of pay of male and female full-pay relevant employees
- The difference between the median hourly rate of pay of male and female full-pay relevant employees
- The difference between the mean bonus pay paid to male and female employees
- The difference between the median bonus pay paid to male and female employees
- The proportions of male and female relevant employees who were paid bonus pay
- The proportions of male and female full-pay relevant employees in lower, lower middle, upper middle, and upper quartile pay bands

The above information will be updated and published annually on the Trust website in a manner that is accessible to all its employees and to the public for a period of at least three years from the publication date.

## 7. Addressing prejudice-related incidents

The Trust is opposed to all forms of prejudice. The Trust will ensure that pupils and staff are aware of the impact of prejudice. The Trust will address any incidents immediately and, where appropriate, report them to the LA.

Any reports of bullying and prejudice will be carefully monitored and dealt with accordingly. Annual training will be given to all staff to ensure that they are aware of the process for reporting and following up incidents of prejudice-related bullying.

## 8. Complaints procedures

The Trust aims to resolve all complaints at the earliest possible stage and is dedicated to continuing to provide the highest quality of education possible throughout the procedure. Any person, including a member of the public, is able to make a complaint about the provision of facilities or services that the Trust provides.

The Trust will adhere to the Complaints Policy to ensure a straightforward, impartial, non-adversarial process, that allows a full and fair investigation, respects confidentiality, and delivers an effective response and appropriate redress. If a complaint has completed the school's process and the complainant remains dissatisfied, they have the right to appeal, as outlined in the Complaints Policy.

The Trust works to develop good professional relationships between colleagues; however, the Trust understands that sometimes conflicts may arise. Through maintaining open communication, the Trust wants its employees to feel able to raise any grievances so that appropriate and effective solutions can be put in place. Grievances raised by staff members will be processed in accordance with the Trust's Grievance Policy.

## 9. Monitoring and review

The CEO will review this policy annually, to ensure that all procedures are up-to-date. The policy will be monitored and evaluated by the CEO and Trustees in the following ways:

- Individual attainment data
- Equal opportunities recruitment data

- Equality impact assessments
- Ofsted inspection judgements on equality and diversity
- Incident records related to harassment and bullying

Any changes made to this policy will be communicated to all relevant stakeholders.

**Appendix A - Equality Impact Assessment Template**

| | |
|---|---|
| **Name of person completing the EIA:** | |
| **Role of person completing the EIA:** | |
| **Date EIA completed:** | |
| **Contributors to the EIA:** | |

| **Policy or process information** | | | | | |
|---|---|---|---|---|---|
| **Name of policy or process:** | | | | | |
| **Purpose and intended aim of the policy or process:** | | | | | |
| **Who is the policy or process intended for? [Tick all that apply.]** | **Pupils** | **Employees** | **Governors/Trustees** | **Volunteers** | **Visitors** |
| | | | | | |
| **Status of the policy or process:** | **New policy or process** | | **Existing policy or process** | | |
| | | | | | |
| **Date policy or process was last reviewed:** | | | | | |
| **Name of person responsible for the policy or process and its review:** | | | | | |

| Analysis | | | | |
|---|---|---|---|---|
| Protected characteristic group | Impact analysis | | | Explanation of impact analysis |
| | Positive impact identified | Neutral impact identified | Negative impact identified | |
| **Age:** | | | | |
| **Disability:** | | | | |
| **Sex:** | | | | |
| **Gender reassignment:** | | | | |
| **Race:** | | | | |
| **Religion or belief:** | | | | |
| **Sexual orientation:** | | | | |
| **Marriage or civil partnership:** | | | | |
| **Pregnancy and maternity:** | | | | |

| Evaluation and decision making | |
|---|---|
| **Consultation and stakeholder engagement:** | *[Include details of any consultation process or engagement with relevant stakeholders. Indicate if consultation or engagement was internal or external.]* |
| **Evidence used to support the decision-making process and final decision:** | *[Provide details of any evidence used to support the final decision made, e.g. research, surveys or verbal feedback.]* |
| **Final decision:** | *[Once an EIA has been completed, if indirect or direct discrimination has been identified, then there are three options to be considered:*<br><br>· *Removal of the policy or process.*<br>· *Adaptation of the policy or process to remove the indirect or direct discrimination.*<br>· *Continue without action.*<br><br>*Record the decision made following completion of the EIA.]* |
| **Explanation of the final decision:** | *[Provide a clear explanation for the decision reached. If the decision is made to continue with the policy or process without any action and discrimination has been identified, then the responsible body would be expected to be able to clearly justify that decision.]* |
| **Monitoring arrangements:** | *[Detail how the outcome of the EIA will be monitored, including frequency of monitoring and any required consultation or stakeholder engagement.]* |

| | |
|---|---|
| **Arrangements for communicating the outcome of the EIA:** | *[Explain how the outcome of the EIA will be shared and with whom, e.g. all relevant stakeholder groups.]* |

| | |
|---|---|
| **Date EIA ratified by the responsible body:** | |
| **Date of review:** | |

**Appendix B: Epping Forest Schools Partnership Trust Equality Objectives Autumn 2021**

| 2010 Equality Act Aims | Trust Objectives | Trust Strategies | Success Criteria |
|---|---|---|---|
| Eliminate discrimination, harassment, victimisation and other conduct that is prohibited by the Equality Act 2010 | 1. Eliminate the use of sexist and racist language by pupils in the school and phobic language relating to gender perception-Links to strategy 1,2, 3 & 6<br><br>2. Ensure the curriculum in our schools recognise and celebrate diversity -Links to strategy 1,2, 3 & 6 | **1.Quality of Education**<br>All schools have access to a stimulating and creative curriculum, which is grounded in robust education pedagogy with clearly articulated principles of high quality teaching and learning with coherent intent, informed implementation and positive impact on ensuring excellent outcomes (attainment and progress) for all pupils.<br><br>**2.Health and Wellbeing**<br>Having a clear health and wellbeing strategy for all stakeholders; all staff to be effective trauma perceptive practitioners.<br><br>**3.Workforce Development**<br>Ensure Professional Development is research-informed and progressive for all stakeholders; all staff participate actively in lifelong learning and taking ownership of the development of their talents and skills, through an evolving National and Trust provision.<br><br>**4.Governance**<br>Build upon existing strong governance to develop robust Local Governing Boards that support and challenge schools.<br><br>**5.Finance and Operations**<br>Realise the financial and operational benefits of being in a Trust by using shared expertise and economies of scale to support all pupils fairly; enable | Incident reporting shows a decline in racist/sexist incidents<br><br>To ensure that the PSHE curriculum in every school addresses discrimination and harassment of all types in an age appropriate way and is regularly reviewed by Governors.<br><br>A Trust wide celebration of diversity is established. |
| | | | |
| Advance equality of opportunity between people who share a protected characteristic and people who do not share it | 3. Actively close gaps in attainment and achievement between 'disadvantaged' pupils and all groups of pupils -Links to strategy 1,2, 3, 4 & 6<br><br>4. Continue to improve accessibility across the school for pupils, staff and visitors with disabilities -Links to strategy 2, 3, 5 & 6 | | The gap between disadvantaged and non-disadvantaged is below national average<br><br>To further improve the accessibility of all building for all people |
| | | | |
| Foster good relations across all protected characteristics | 5. Be an employer committed to promoting inclusion and diversity within our workforc and ensuring our workforce is reflective o the community we serve -Links to strategy 2, 3 & 4 | | Our school curriculum reflect cultural diversity in all subjects |

| | | | |
|---|---|---|---|
| – between people who share a protected characteristic and people who do not share it | 6. Ensure the curriculum in our schools recognise and celebrate diversity -Links to strategy 1,2, 3 & 6 | schools and therefore the Trust to be efficient.<br><br>**6.Technology**<br>To use technology to facilitate a fully effective and collaborative Trust for all stakeholders. | A Trust wide celebration of diversity is established |
| | | | |