

EQUITY, DIVERSITY AND INCLUSION POLICY (STAFF)

Policy Owner Head of HR	Applies to Prior Park Schools (Trust Wide)	Superseded documents Equal Opportunities Policy v2
Associated documents Dignity at Work Policy Disciplinary Policy Grievance Policy Staff Code of Conduct Flexible Working Policy Safer Recruitment Policy and Procedure	Review frequency Every three years (unless the legislation/regulations update before this time) Implementation date 1 September 2025	Legal Framework Equality Act 2010 Employment Rights Act 1996 Health and Safety at Work etc. Act 1974 Data Protection Act 2018 / UK GDPR

This policy is reviewed triennially, or more regularly as required, prior to approval by Trustees (if applicable)

Last reviewed by:	Head of HR (Miss K Niec) and Head of Compliance (Miss E Wickham)
Date last reviewed:	June 2025
Approved by Trustees:	Approved by PEB and disseminated to BOT
Date last approved:	August 2025
Date for next approval:	August 2028

1. Introduction

Prior Park Schools (PPS) is a family of Christian schools based in Bath and Gibraltar. Prior Park College (PPC) and The Paragon School (TP) are incorporated in England as Prior Park Educational Trust Ltd. Prior Park School Gibraltar (PPSG), is incorporated in Gibraltar as Prior Park School Ltd. Both are companies limited by guarantee and registered charities.

The Prior Park Schools mission, underpinned by shared values, is to steward a thriving family of communities with love for the young people they serve at their heart. These vibrant communities cultivate creativity, foster integrity, and transform lives.

Prior Park Schools Values:

Curiosity - Generosity - Courage

2. Scope

This policy applies to all employees, whether full-time, part-time, permanent or fixed-term, as well as to volunteers, contractors, agency workers and job applicants across PPS. It is relevant to all aspects of the employment relationship and work environment and is intended to guide behaviour and practice.

It covers conduct:

- whilst carrying out work duties or acting in a professional capacity on behalf of Prior Park Schools
- in any non-working context where an individual is identifiable as a member of the PPS community (e.g. social events, online activity, public forums)
- in all forms of communication, including verbal, written, digital, and online interactions, whether on or off-site.

3. Policy Aims

This policy outlines PPS's commitment to equity, diversity and inclusion. Its purpose is to:

- create an inclusive and respectful working environment where everyone feels valued
- promote equity of opportunity and prevent unlawful discrimination
- embed inclusive practices across recruitment, progression, management, and daily operations
- meet and strive to exceed our legal obligations under the Equality Act 2010 and other relevant legislation.

4. Definitions

Prior Park Schools values equity, diversity and inclusion as essential to a thriving and respectful school community. We are committed not only to complying with the law but to creating an environment where every individual feels recognised, respected and supported.

a. Equity, Diversity and Inclusion

Equity means ensuring that all individuals are treated fairly and have access to the opportunities they need to work, learn, and develop, regardless of their background or personal characteristics.

Diversity recognises and respects the value that people from different backgrounds, experiences and perspectives bring to our community.

Inclusion is about fostering a culture where everyone feels they belong – where differences are welcomed, individuals are supported, and all can contribute and thrive.

These three principles work together to create a school environment that is not only legally compliant but socially just and professionally respectful.

b. Discrimination

Under the Equality Act 2010, it is unlawful to treat someone unfairly because of a protected characteristic. These are:

- Age
- Disability
- Gender reassignment
- Marital or civil partnership status
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

The Equality Act 2010 protects individuals from discrimination based on sex (understood in law as biological sex) and gender reassignment. We recognise that individuals may identify with a gender different from their biological sex, and we remain committed to treating all individuals with dignity and respect in line with both protected characteristics.

Types of unlawful discrimination include:

- Direct discrimination - treating someone less favourably because of a protected characteristic
- Indirect discrimination - applying a policy or rule that disadvantages certain groups, without objective justification
- Associative discrimination - treating someone unfairly because of their association with someone with a protected characteristic
- Perceptive discrimination - treating someone unfairly based on the assumption that they have a protected characteristic

Additional protections apply to disability, including:

- Discrimination arising from disability - treating someone unfairly due to something connected to their disability, without justification
- Failure to make reasonable adjustments - not taking appropriate steps to remove barriers for disabled people

Discrimination may not always be intentional. It can result from assumptions, stereotypes or unconscious bias. Staff are expected to be reflective in their decisions and interactions to help ensure a fair and inclusive working environment.

c. Harassment

Harassment is unwanted behaviour related to a protected characteristic that has the effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.

Sexual harassment includes unwanted conduct of a sexual nature or unfavourable treatment due to the rejection or acceptance of such conduct.

Harassment can take many forms – verbal, physical, written or digital – and may be a single serious incident or ongoing behaviour. It can occur in-person or online, and affect anyone, regardless of intent.

d. Victimisation

Victimisation is treating someone unfairly because they have:

- Made a complaint about discrimination or harassment
- Supported someone else's complaint (for example, by acting as a witness in a disciplinary hearing)
- Been perceived to have taken either of the above actions

PPS is committed to ensuring that staff and pupils feel able to raise concerns without fear of reprisal.

e. Bullying

Although not defined in law, PPS defines bullying as any behaviour that is offensive, intimidating, malicious or insulting, and which undermines or humiliates an individual. It often involves an abuse of power and may be repeated over time, though a single incident can also constitute bullying.

Bullying may be:

- Verbal or physical
- Written or electronic (e.g. emails, messages, social media)
- Face-to-face or remote

Where bullying relates to a protected characteristic, it may also amount to harassment under the Equality Act.

5. Commitment to Equity, Diversity and Inclusion

PPS is committed to promoting a working environment based on dignity, trust and respect, and one that is free from discrimination, harassment, bullying or victimisation. We recognise that people come from a wide range of backgrounds and that these differences should be celebrated.

We believe that a diverse and inclusive workforce is one of our greatest strengths. Our approach to inclusion includes:

- maintaining a culture of fairness and respect towards all individuals
- upholding equal opportunity in our employment practices
- being mindful of potential barriers to participation or inclusion and considering how these may be minimised where reasonable
- fostering an environment where differences are recognised and treated with respect; and
- encouraging a professional culture in which individuals feel able to raise concerns or express views without fear of unfair treatment.

We ensure that our recruitment, promotion and retention procedures do not treat people less favourably because of their characteristics (please see the *protected characteristics* listed above).

6. Expected Conduct

We expect you, and every member of our community, to take personal responsibility for observing, upholding, promoting and applying this policy. Our culture is made in the day-to-day working interactions between us so creating the right environment is a responsibility that we all share. Staff in leadership roles have an enhanced responsibility to model inclusive behaviour.

Every member of the PPS community is expected to:

- treat others with respect, dignity, fairness and trust
- avoid assumptions or stereotypes about others
- refrain from discriminatory or offensive behaviour
- speak up if they witness inappropriate or discriminatory behaviour; and
- contribute to a culture where everyone can be themselves and flourish

Any dealings that you have with colleagues, or third parties must be free from any form of discrimination, harassment, victimisation or bullying. These behaviours are contrary to our values. If conduct contrary to these expectations occurs, it may lead to disciplinary action in line with our Disciplinary Policy.

Staff need to be aware that they can be personally liable for discrimination and harassment.

7. Inclusive Practices

PPS is committed to implementing fair and inclusive practices across:

- Recruitment and Selection - All applicants are assessed based on merit. Reasonable adjustments will be made where required.
- Career Development - Training and development opportunities are accessible to all.
- Flexible Working - We support applications for flexible working in accordance with our policy.
- Disability Support - Reasonable adjustments to roles or working arrangements, as appropriate.
- Facilities - Most of our facilities (e.g. toilets or changing areas) are provided on a single-sex basis in line with current legal guidance. We remain committed to exploring reasonable, respectful accommodations that ensure all staff feel safe and supported.

8. Raising Concerns

Staff who believe they have experienced or witnessed discrimination, bullying, or harassment are encouraged to report their concerns as soon as possible. Concerns can be raised with your line manager, a senior leader or a member of the HR department.

Reports will be treated sensitively and investigated fairly. Retaliation against those raising concerns in good faith will not be tolerated.

9. Training and Awareness

Prior Park Schools encourages all staff to engage with training on equity, diversity and inclusion as part of their ongoing professional development.

EDI training is available through our online learning platform and is made available for all staff, particularly those involved in recruitment, management or decision-making.

Further learning may also be accessed through CPD opportunities, which may include workshops, or internal development sessions.

Training aims to:

- Promote understanding of the Equality Act 2010 and protected characteristics
- Support inclusive and respectful communication
- Equip staff to identify and respond appropriately to discrimination, harassment or bias
- Reinforce an inclusive and welcoming culture across all Prior Park Schools

10. The Halo Code

PPS have committed to The Halo Code. The "Halo Code" is a UK-based campaign that protects the rights of individuals with Afro-textured hair and protective hairstyles, ensuring they can express their racial, ethnic, and cultural identities without discrimination in workplaces and schools. It was developed by the Halo Collective to combat hair discrimination and promote inclusivity. Staff (and students) will not be discriminated against for the style in which they choose to wear their Afro-textured hair. Any discrimination in relation to hairstyle is not acceptable and will be dealt with in accordance with the Trust's Dignity at Work Policy.

11. Monitoring

We regularly review this policy to ensure its effectiveness. Monitoring may include anonymous staff surveys, analysis of workforce data (in line with data protection requirements), and feedback from staff groups.