

THE NEW SCHOOL ROME

Anti-Discrimination Policy: New School Rome (2026)

Policy Overview

1. Statement of Intent

New School Rome is committed to providing a safe, inclusive, and equitable environment where every member of our community - regardless of the following protected characteristics **race, ethnicity, nationality, religion, belief, political or other opinion, gender, gender identity, sexual orientation, disability, or age** - feels a profound sense of belonging. We recognise that our diverse international tapestry is our greatest strength. We strive to foster an atmosphere where "Global Citizenship" is not just a curriculum point, but a lived experience.

2. Legal Framework and Scope

In accordance with **Article 3 of the Italian Constitution** and **Legislative Decrees 215/03 and 216/03** and in line with COBIS standards, this policy prohibits all forms of direct and indirect discrimination. This policy applies to all students, staff, parents, and visitors, whether on campus, during school trips, or in digital spaces. It is a requirement under Italian law to ensure a non-hostile environment.

3. Zero-Tolerance for All Forms of Discrimination

We maintain a zero-tolerance approach toward any behavior that undermines the dignity of an individual. We define a discriminatory incident as any action or language **perceived as such by the victim or a witness**. This includes, but is not limited to:

- **Direct Discrimination:** Treating a member of the community less favourably based on an actual or perceived protected characteristic.
- **Harassment:** Unwanted conduct related to a protected characteristic that violates dignity or creates an intimidating environment.
- **Microaggressions:** Subtle, everyday slights or "jokes" regarding a person's background, accent, physical ability, or identity.
- **Exclusionary Behavior:** Comments or actions suggesting a student does not "belong" in our school or the wider Italian community. This includes the use of xenophobic tropes.
- **Cyber-discrimination:** The use of digital platforms to spread stereotypes, slurs, or exclusionary content.

4. Impact Over Intent

At New School Rome, we believe that education is a journey. While we recognise that students may not act with malicious intent, the school prioritises the **impact** of actions including language used on the victim and the wider community.

- **Accountability:** Ignorance of the weight of one's words is not a justification for harm.
- **Restorative Learning:** While disciplinary actions will be taken in line with the school behaviour policy we use these moments as opportunities for deep reflection and restorative justice to heal the community.

5. Shared Responsibility

Safeguarding our students from discrimination is a collective responsibility. Our commitment includes:

- **Rigorous Investigation:** Investigating every report thoroughly, impartially, and in accordance with Italian/EU privacy laws (*GDPR*).
- **Support Systems:** Prioritising the psychological safety and well-being of the victim as well as, in appropriate cases, the perpetrator.
- **Proactive Education:** Continuously evolving our curriculum to challenge biases and celebrate the multifaceted identities within our school and employing restorative practices to educate those who cause harm

6. Prevention and Curriculum

- **PSHE & Global Citizenship:** The curriculum will explicitly teach students about systemic inequality, the history of human rights, and the importance of inclusive language and "active allyship." (see appendix 1 for more information on how to be an active ally)
- **Staff Training:** All staff will take part in training on Unconscious Bias and Anti-Discrimination to ensure a consistent, school-wide approach to equity. (this will occur during the staff induction period)

7. Implementation & Sanctions

Any breach of this policy will be investigated under the **School's Behaviour policies, Disciplinary Procedures or Complaints Policy.**

- **For Pupils:** May result in sanctions ranging from a formal warning to expulsion.
- **For Staff:** May result in disciplinary action up to and including summary dismissal, in accordance with the Italian Labor Code (*Codice del Lavoro*).
- **For Parents/Visitors:** May result in a ban from the school premises or termination of the educational contract.

Defining and responding to discriminatory incidents.

[\(Teachers should see challenging discrimination tool kit\)](#)

1. Definition of a Discriminatory Incident

In line with international best practices and in line with Italian law, New School Rome defines a discriminatory incident as:

"Any incident which is perceived to be discriminatory by the victim or any other person."

Specific examples include but are not limited to:

- **Verbal:** Slurs, "jokes," or derogatory comments regarding a person's **race, ethnicity, nationality, religion, belief, political or other opinion, gender, gender identity, sexual orientation, disability, or age**
- **Physical:** Intimidation, exclusionary gestures, or violence based on a protected characteristic.
- **Non-Verbal/Digital:** Excluding students from social groups, or sharing discriminatory content including memes and stickers via social media or messaging apps (e.g., WhatsApp/Snapchat).

2. Reporting and Recording

All incidents must be recorded in a dedicated **Discriminatory Incident Log** (maintained separately from general behavioral records).

- **Staff Duty:** Any staff member witnessing or receiving a report of a potential incident must report it to the **AC Chair** or **Designated Safeguarding Lead (DSL)** as soon as possible and always within 24 hours.
- **Confidentiality:** Reports are handled with high discretion in accordance with **GDPR and Italian Privacy Law**, though anonymity cannot be guaranteed if a safeguarding risk is identified. We will not share information with staff, students or parents as a matter of course
- **Active measures:** Italian law requires the school to take "active measures" to stop discrimination; failure to do so could result in corporate liability for the institution

3. Response Framework (The Three Pillars)

When an incident occurs, the school follows a structured three-step process:

1. **Investigation:** Promptly gathering witness statements and interviewing all parties involved with an impartial lens.
2. **Sanction:** Applying a tiered consequence based on the severity and frequency of the behavior.

3. **Restoration & Education:** Requiring the perpetrator to engage in restorative practices and educational reflection to understand the impact of their actions on the individual and the community.

4. Sanctions Framework

Sanctions must be "proportionate and educational" (as per the **Statuto delle Studentesse e degli Studenti - D.P.R. 249/1998**).

Tier	Behaviour Type	Immediate Action	Sanction
Tier 1	Ignorance / Slang (e.g. "that's so (slur)", "Are you (slur)")	Correct and Pivot: Explain why it's harmful, provide a better word, and continue the lesson. Report to tutor at the end of the lesson.	<ul style="list-style-type: none"> • Warning given • Educational conversation to explain our policy • Record place in the student file and logged on the incident log
Tier 2	Targeted / Repeated (Jokes at someone's expense, persistent tropes)	Separate & log: Move the student, have a private 1 to 1 at the end of the lesson and report the incident to the tutor, coordinator and AC Chair	<ul style="list-style-type: none"> • Temporary exclusion 1 - 3 days • Mandatory reflection (including a letter of apology) • Record place in the student file and logged on the incident log
Tier 3	Hate Speech / Hostility (Aggressive slurs, threats, harassment)	Remove & Report: Send to the AC Chair immediately. Do not engage in a debate. If necessary send another student for support from another teacher or the AC Chair.	<ul style="list-style-type: none"> • Long term or permanent exclusion following a full disciplinary hearing including a representative of the EC • Record place in the student file and logged on the incident log

In line with Italian educational reform, the school favors sanctions that involve "socially useful activities." For example, a student who uses exclusionary language may be required to do the following as a mandatory reflection:

- Research and present the history of migration or international human rights.
- Perform community service within the school that fosters integration.

5. Support for the Victim

The school's primary duty of care is to the student who has experienced discrimination.

- The victim will be offered immediate support through the Inclusion team who will arrange for support from a counselor if required.

- The parents of the victim will be informed of the school's response to ensure the student feels safe and supported in returning to their studies.

6. Protection Against Retaliation

Italian law protects those who report discrimination. No student or other member of the community will be penalised for bringing a "Good Faith" report of discrimination to the attention of the administration.

Prohibited Conduct & Definitions

The School operates a zero-tolerance approach to the following behaviours. These definitions apply to all members of the School Community, including staff, pupils, parents, and visitors.

1. Direct Discrimination

Direct discrimination occurs when a person is treated less favorably than another in a comparable situation because of a **Protected Characteristic**.

- *Example:* Refusing to enroll a student specifically because of their nationality or religious background.

2. Indirect Discrimination

Indirect discrimination occurs when an apparently neutral provision, criterion, or practice would put persons of a particular group at a disadvantage compared with other persons, unless that provision is objectively justified by a legitimate aim.

- *Example:* Setting a mandatory school event on a major religious holiday without a valid pedagogical reason, effectively excluding those who observe that faith.

3. Harassment (*Molestie*)

In accordance with **Legislative Decree 215/03**, harassment is defined as unwanted conduct related to a Protected Characteristic which has the purpose or effect of:

- Violating an individual's dignity.
- Creating an intimidating, hostile, degrading, humiliating, or offensive environment.
- *Note:* Harassment can be a single intense incident or a series of incidents. It includes "Bullying" when the behavior is targeted at a specific identity.

4. Victimization (*Vittimizzazione*)

Victimization is specifically prohibited under Italian and International law. It occurs when a person is treated badly or "punished" because they have:

- Made a complaint about discrimination or harassment.
- Supported someone else's complaint (e.g., acting as a witness).
- Raised a concern regarding the school's compliance with Equal Opportunities. The School will protect any individual from retaliation for raising a "good faith" concern.

5. Instructing or Pressuring to Discriminate

It is a breach of this policy for any person to instruct, induce, or put pressure on another to perform an act of discrimination.

- *Example:* A parent pressure a teacher to exclude a student with a disability from a group project.

Appendix 1 Active allyship

Active Allyship

In the context of a school like **New School Rome**, **active allyship** is the shift from being a "passive bystander" (someone who disagrees with discrimination but stays silent) to being an "active upstander" (someone who uses their voice and influence to support others).

It is a practice, not a label. Here is a breakdown of what it looks like in a school environment:

1. The "Upstander" vs. The "Bystander"

A bystander sees a student being teased for their accent or religion and thinks, "*That's wrong,*" but walks away. An **active ally** intervenes. This doesn't always mean a confrontation; it can be as simple as:

- **Interrupting:** "Hey, that's not funny," or "We don't talk like that here."
- **Redirecting:** Changing the subject to stop the exclusion.
- **Reporting:** Telling a teacher because you know it's the right thing to do for the community.

2. Centering the Victim (Not Yourself)

Active allyship is about supporting the person who was harmed, rather than trying to be the "hero."

- **Check-in:** After an incident, an ally asks the victim: *"Are you okay? I saw what happened and it wasn't right. Do you want me to go with you to tell a teacher?"*
- **Listening:** Validating their feelings without saying, *"I'm sure they didn't mean it that way."*

3. Continuous Learning

In an international school, we all have **unconscious biases** (prejudices we don't realize we have). An active ally:

- Acknowledges they don't know everything about every culture or identity.
- Does the work to learn about the history and struggles of others rather than expecting the marginalized person to "teach" them.
- Is open to being corrected. If an ally makes a mistake and is told their words were hurtful, they apologize and learn rather than becoming defensive.

4. Using Privilege for Good

If a student is in a "dominant" group (for example, a native Italian speaker in Rome or a student from a wealthy background), they often have more social "clout." Active allyship is using that social standing to:

- Invite excluded students into a game or conversation.
- Make sure everyone's voice is heard in group projects.
- Challenge "jokes" that others might be too intimidated to speak up about.

The Allyship Golden Rule: > *"Ally is a verb, not a noun. You aren't an ally because of who you are; you are an ally because of what you do."*