



# SEAX TRUST

## Equal Opportunities & Diversity Policy and Objectives



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Approved by the Board of Trustees &  
Effective Date of Adoption:

**16<sup>th</sup> October 2024**

### Amendments Oct24:

Section	Amendment
Page 3	Introductory information updated to reflect current procedure
Section 1 Introduction	Bullet points added to clarify the Trust's commitment to equality and diversity
Section 3 The Public Sector Duty	Wording altered to clarify the Trust's expectation under the PSD
Section 4 Types of Discrimination	Section added in relation to sexual harassment Section added outlining actions which will be taken when allegations of discrimination are made
Section 5 Equality in Employment	LGBTQIA+ section added Reference added to the fact that the Trust maintains 'Disability Confident Employer' status
Section 6 Development of the Policy	Section added to reference the fact that the Trust has an active cross-Trust Equality & Diversity Group
Appendix 1	Equality Objectives updated for 2024-27
Appendix 2	New appendix added in relation to sexual harassment

### Related SEAX Trust Policies:

Equality & Diversity in Employment Policy  
Mental Health & Wellbeing Policy  
Performance Management Procedure  
Recruitment & Retention Plan  
Sickness Absence Management Procedure  
Health & Safety Policy

Leave of Absence Policy  
Pay Policy  
Pre-Employment Checks Procedure  
Recruitment Procedure  
Whistle Blowing Policy  
E-Safety and Acceptable Use policies

### Related School based Policies:

Behaviour  
Attendance  
Admissions  
SEND  
Anti-bullying  
Relationships & Sex Education Policy (RSE)  
Accessibility Policy

It is also reflected in the  
PSCHE curriculum of all schools in the Trust

The **SEAX Trust** is committed to being a fair and reasonable employer and to ensuring that it provides a professional and ethical environment which serves and protects the whole education community.

Through the **Scheme of Delegation**, the SEAX Trust is responsible for determining HR policies in accordance with all appropriate regulations:

- Setting Terms and Conditions of Employment
- Establishing Trust-wide policies, including Pay, Performance Management, Code of Conduct, Recruitment, Capability, Discipline & Dismissal, Grievance, Leave of Absence, Sickness Absence, Redundancy & Restructuring
- Appointing the CEO
- Appointing cross-Trust staff
- Dismissing the CEO, local Headteachers, Deputy Headteachers and senior cross-Trust staff, in accordance with the Trust's Disciplinary and Capability Policies

Through effective **HR management**, the SEAX Trust will:

- Establish and maintain an effective organisational structure in which all staff are clear about their roles
- Recruit, deploy and retain staff flexibly, to meet the establishment's priorities and future plans, making the best use of individual skills
- Induct and develop staff in line with their individual needs and those of the establishments' improvement plans
- Establish and maintain constructive and harmonious staff relationships through good channels of communication, consultation and feedback
- Ensure equal opportunities in recruitment, staff development, training, management and pay
- Develop, maintain and operate policies and procedures which motivate and support staff, facilitate the early resolution of disputes and promote attendance
- Allocate appropriate resources to HR management and equip managers at all levels to effectively manage HR issues
- Prioritise staff wellbeing, effective communication and transparent consultation systems
- Regularly monitor, measure, evaluate and review all aspects of HR management
- Have in place appropriate administrative systems to support the management of HR issues.

The **SEAX Trust** is responsible for determining the Pay Policy and Performance Management (Professional Growth) Policy, following consultation with staff.

The **CEO** is responsible for reviewing, proposing and implementing amendments to the Pay Policy and the Performance Management (Professional Growth) Procedure in consultation with staff.

The **Pay Committee** is responsible for reviewing and proposing amendments to the Pay Policy and the Performance Management (Professional Growth) Procedure. in consultation with staff, and for making pay decisions following Performance Management (Professional Growth) Reviews. Headteacher and CEO pay decisions are made by the Pay Committee, with ratification by the **Board of Trustees**.

All **Appeal Panels** have representation from independent cross-Trust Academy Committee members and/or Trustees.

## 1. Introduction

The SEAX Trust (“the Trust”) is an inclusive community where we focus on the wellbeing, development and progress of every child and adult and where all members of our community are of equal worth.

The Equality Act 2010 provides a framework to support our commitment to valuing diversity, tackling discrimination, promoting equality and fostering good relationships between people. It also ensures that we continue to tackle issues of disadvantage and underachievement of different groups.

Equality within our community supports good education, improves student outcomes and raises standards and we are committed to:

- Promoting equal opportunity and community cohesion, where the diversity of different backgrounds and circumstances is appreciated and positively valued
- Promoting fundamental British values of democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs.

We expect all staff, volunteers, workers and pupils to share this commitment.

### **Our approach to equality is based on the following seven key principles:**

1. **All staff\* are of equal value**, whether or not they are disabled, whatever their ethnicity, race, national origin or national status, whatever their gender and gender identity, whatever their religious or non-religious affiliation or faith background, pregnancy or maternity, gender reassignment and whatever their sexual orientation.  
(\*For the purposes of this policy, the term ‘staff’ covers paid employees, whether they are on permanent, temporary or supply contracts and whether these are on a full or part-time basis. It also includes agency workers, volunteers and those engaged on contracts to work for the Trust.)
2. **We recognise, respect and value difference and understand that diversity is a strength.** We take account of differences and strive to remove barriers and disadvantages which people may face, in relation to the protected characteristics under the Equality Act. We believe that diversity is a strength, which should be respected and celebrated by all those who learn, teach and visit here.
3. **We foster positive attitudes and relationships.** We actively promote positive attitudes and mutual respect between groups and communities which are different from each other.
4. **We foster a shared sense of cohesion and belonging.** We want all members of our academy communities to feel a sense of belonging within the Trust and wider community and to feel that they are respected and able to participate fully in school and college life.
5. **We observe good equalities’ practice for our staff.** We ensure that policies and procedures benefit all employees and potential employees in all aspects of their work, including in recruitment and promotion, and in continuing professional development.

6. **We have the highest expectations of all our students.** We expect that all students can make good progress and achieve to their highest potential, whether or not they are protected under the Equality Act.
7. **We work to raise standards for all students, but especially for the most vulnerable.** We believe that improving the quality of education for the most vulnerable groups of students raises standards across the whole academy and, in turn, the Trust.

## 2. Purpose of the Policy

The Equality Act 2010 ensures protection from discrimination, harassment and victimisation on the grounds of specific characteristics (referred to as “protected characteristics”). This means that the Trust cannot discriminate against students or staff or treat them less favourably because of their **sex (gender), race, disability, religion or belief, gender reassignment, sexual orientation, pregnancy or maternity.**

**Age, marriage and civil partnership** are also protected characteristics relating to staff, but are not part of the education provisions related to students.

The Equality Act makes it unlawful for the responsible body of a school 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, or
- by excluding a pupil or subjecting them to any other detriment.

The Equality Act requires all public organisations, including the Trust, to comply with the **Public Sector Equality Duty.**

## 3. The Public Sector Equality Duty (PSED)

The Public Sector Equality Duty (Apr11) requires all public organisations, including academies, to have due regard to the need to:

- Eliminate discrimination and other conduct which is prohibited by the Act
- Advance equality of opportunity between people who share a protected characteristic and people who do not share it
- Foster good relations across all characteristics, between people who share a protected characteristic and people who do not share it

### The Equality Duty

The Public Sector Equality Duty requires all public organisations, including the Trust, to;

1. Publish information to show compliance with the Equality Duty.
2. Publish Equality objectives at least every four years, which are specific and measurable.

**Appendix 1** shows the Trusts Equality Objectives for 2022-26 in an Equality Action Plan.

By having due regard to the Public Sector Equality Duty, the Trust aims to remove or minimise disadvantage, to take all steps possible to meet people's different needs, and to encourage participation, particularly among those who might not otherwise participate.

This section describes how the Trust is meeting these statutory duties. It includes information about how the Trust is complying with the Public Sector Equality Duty and also provides guidance to staff and visitors about our approach to promoting equality.

## **4. Types of Discrimination**

### **4.1 Unlawful Behaviour**

The Equality Act defines four kinds of unlawful behaviour:

#### **a. Direct Discrimination**

This occurs when one person treats another less favourably, because of a protected characteristic. For example if a school were to refuse to let a pupil be a prefect because she is a lesbian.

#### **b. Indirect Discrimination**

This occurs when a practice is applied generally but has the effect of putting people with a particular characteristic at a disadvantage when compared to people without that characteristic. An example might be holding a parents' meeting on a Friday evening, which could make it difficult for observant Jewish parents to attend.

It is a defence against a claim of indirect discrimination if it can be shown to be "a proportionate means of achieving a legitimate aim". This means both that the reason for the rule or practice is legitimate, and that it could not reasonably be achieved in a different way which did not discriminate.

#### **c. Harassment** (See also: 'Sexual Harassment' below)

This is "unwanted conduct, related to a relevant protected characteristic, which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person". This covers unpleasant and bullying behaviour, but potentially extends also to actions which, whether intentionally or unintentionally, cause offence to a person because of a protected characteristic.

#### **d. Victimisation**

Victimisation is also prohibited. This is less favourable treatment of someone who has complained or given information about discrimination or harassment or supported someone else's complaint.

**Association:** It is unlawful to discriminate against someone because of a protected characteristic belonging to another person with whom that person is associated. Eg: a school cannot refuse to admit a pupil because his parents are gay men or lesbians.

**Perception:** It is unlawful to discriminate against someone because it is perceived they have a protected characteristic, even if they do not. Eg: a teacher picking on a pupil for being of Jewish faith would be discriminating in terms of religion whether or not the pupil was, in fact, of Jewish faith.

#### **4.2 Sexual Harassment**

'Harassment' covers unwanted conduct related to a protected characteristic which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. Sexual harassment is unwanted conduct of a sexual nature that has that effect.

From October 2024, the **Worker Protection (Amendment of Equality Act 2010) Bill** strengthened protection for workers against sexual harassment. **Appendix 2** covers Sexual Harassment in more detail and must be read fully in conjunction with this policy.

#### **4.3 Allegations of Discrimination**

The Trust takes allegations of all types of discrimination very seriously. Allegations may be subject to a full investigation procedure and all members of the SEAX community should be aware that, if founded, the most serious cases will result in the perpetrator being dismissed from post.

### **5. Equality in Employment**

#### **Recruitment & Selection**

We aim to ensure that no job applicant suffers discrimination because of any of the protected characteristics. Our recruitment procedures are reviewed regularly to ensure that individuals are treated on the basis of their relevant merits and abilities. Job selection criteria are regularly reviewed to ensure that they are relevant to the job and are not disproportionate.

Job advertisements avoid using wording that may discourage particular groups from applying. A short policy statement on equal opportunities and a copy of this policy is sent on request to those who enquire about vacancies.

We take steps to ensure that our vacancies are advertised to a diverse labour market and, where relevant, to particular groups that have been identified as disadvantaged or underrepresented in the Trust.

Applicants are not asked about health or disability before a job offer is made. There are limited exceptions which we may use, for example:

- questions necessary to establish if an applicant can perform an intrinsic part of the job (subject to any reasonable adjustments);
- questions to establish if an applicant is fit to attend an assessment or any reasonable adjustments that may be needed at interview or assessment;
- positive action to recruit disabled persons; and
- equal opportunities monitoring (which will not form part of the decision-making process).

Applicants are not asked questions about any of the protected characteristics without first considering whether such matters are relevant and may lawfully be taken into account.

We are required by law to ensure that all members of Staff are entitled to work in the UK. Assumptions about immigration status are not made based on appearance or apparent nationality. All prospective members of staff, regardless of nationality, must be able to produce the requisite original documents or satisfy the necessary online checks, before employment starts, to satisfy current immigration legislation. A list of acceptable documents is available from the Government website at: [www.gov.uk](http://www.gov.uk)

To ensure that this policy is operating effectively, and to identify groups that may be underrepresented or disadvantaged in the Trust, we will monitor applicants' ethnic group, gender, disability, sexual orientation, religion, and age as part of the recruitment procedure. Provision of this information is voluntary, and it will not adversely affect an individual's chances of recruitment, or any other decision related to their employment. The information will be removed from applications before shortlisting and kept in an anonymised format solely for the purposes stated in this policy. Analysing this data helps us to take appropriate steps to avoid discrimination and improve equality and diversity.

### **Recruitment of Applicants with a Criminal Record**

The Trust is an organisation that uses the Disclosure and Barring Service (DBS) to assess candidates' suitability for positions of trust working in an environment with children or vulnerable adults. All those engaged by the Trust in any capacity will undergo an Enhanced DBS Check and those working in regulated activity will undergo the relevant Barred List Checks as part of the Trust's usual Safer Recruitment Procedures. We fully comply with the DBS Code of Practice and undertake to treat all candidates fairly.

We endeavour not to discriminate unlawfully against any candidate who is required to provide information (a check) through this process. Having a criminal record will not necessarily prevent a candidate from working with the Trust. Whether or not it does will depend on the nature of the position and the circumstances and background of the offence(s).

Our policy on the recruitment of those with a criminal record will be made available to all candidates at the outset of the recruitment process. We will ensure that it makes any candidate who is subject to a check aware of the DBS Code of Practice and will provide a copy of the Code on request.

As an Enhanced DBS check is part of our recruitment process, we encourage all candidates called to interview to provide details of any criminal record (except cautions and convictions which are "protected" (as defined in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (Amendment) (England and Wales) Order 2013 and 2020) at an early stage of the application process. We request that this information is sent under separate, confidential, cover to a designated person within the Academy/ Trust who may vary depending on the nature of the post being recruited. We guarantee that only those who need to see this information as part of the recruitment process will see it.



We will ensure to discuss with the candidate the relevance of any offence to the job in question. A candidate's failure to reveal information directly relevant to the job may result in an offer of employment being withdrawn.

### **Staff Training, Promotions and Conditions of Service**

Staff training needs will be identified through informal and formal staff appraisals. All Staff will be given appropriate access to training to enable them to progress within the Trust and all promotion decisions will be on the basis of merit.

The composition and movement of Staff at different levels will be reviewed from time to time to ensure equality of opportunity at all levels within the Trust. Where appropriate, we will take steps to identify and remove unnecessary or unjustifiable barriers and provide appropriate facilities and conditions of service to meet the special needs of disadvantaged or under-represented groups.

The conditions of service, benefits and facilities that we provide will be reviewed from time to time to ensure that they are available to all staff who should have access to them and that there are no unlawful obstacles to accessing them.

### **LGBTQIA+**

The Trust aims to promote a flexible and tailored approach to managing gender identity and any specific needs of intersex people within the Trust community, which is led by the individual employee, worker or pupil. Specific training for colleagues and Line Managers will be made available, where required, but there is an expectation that all staff have an awareness of trans and intersex issues, in order to promote enhanced inclusion.

The Trust follows current legal requirements in respect of both its adult and pupil population, including minors. There is an acknowledgement that trans and non-binary people may be particularly vulnerable to negative treatment and bullying and a robust and no-tolerance approach to this will be adopted in all cases.

The Trust's aim is for the production of administrative documents to maintain an awareness of the use of terminology which is directed towards a fully inclusive reader base. Similarly, the Trust aims to promote inclusivity through verbal awareness, eg by the use of 'everyone' in place of 'ladies and gentlemen'.

Particular attention to the requirements of confidentiality will be given in relation to the storage of data relating to gender identity and that of intersex people, with a specific requirement to ensure that information is administered as 'highly sensitive' in terms of data protection.

No discrimination will be tolerated by the Trust for members of the LGBTQIA+ community in terms of benefits such as recruitment, training or selection for promotion. Benefits will be based solely on merit.

Specific support will be provided for colleagues making the decision to transition during their employment with the Trust, and/or for LGBTQIA+ colleagues who may at any time experience workplace-related difficulties.

## **Equal pay**

The Equality Act provides that men and women should receive equal pay for equal work. The Act allows a claim of direct pay discrimination to be made, even if no actual comparator can be found. This means that a claimant who can show evidence that they would have received better remuneration from the Trust if they were of a different sex may have a claim, even if there is no-one of the opposite sex doing equal work with the Trust.

This would be a claim under sex discrimination.

## **Pay Secrecy**

The Trust will not prevent or restrict its employees from having discussions to establish if they believe pay differences exist that are related to a protected characteristic. The Trust may, in particular, require its employees to keep pay rates confidential outside the workplace e.g. to a competitor organisation.

## **Gender Pay Gap Reporting**

The SEAX Trust is an employer with a gender pay gap reporting duty for public-sector employers in England, as set out in the Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017.

The Regulations include a requirement for public sector employers with 250 or more employees to publish:

- the difference in mean and median pay between male and female employees;
- the difference in mean and median bonus pay between male and female employees and the proportions of male and female employees who were paid bonus pay; and
- the proportions of male and female employees in each quartile of their pay distribution.

The snapshot date for gathering data each year is 31<sup>st</sup> March. The Trust publishes its report within the required period of 12 months (beginning with the snapshot date) on the GOV.UK website and also on its own website.

## **Termination of Employment**

We will ensure that redundancy criteria and procedures are fair and objective and are not directly or indirectly discriminatory. The Trust will also ensure that absence, capability and disciplinary procedures and penalties are applied without discrimination and are carried out fairly and uniformly for all staff, whether they result in formal warnings, dismissal or other action.

## **Disability Discrimination**

If a member of Staff is disabled, or becomes disabled, in the course of their employment with the Trust, they are encouraged to tell us about their condition. This is to enable us to support the member of staff appropriately and make reasonable adjustments

If a member of Staff experiences difficulties at work because of their disability, they may wish to contact their Line Manager/Headteacher to discuss any reasonable adjustments they consider may be necessary, or which would assist in the performance of their duties. The Line Manager/Headteacher may wish to consult with the member of staff and their medical adviser(s) about possible adjustments. Careful consideration will be given to any such proposals, and they will be accommodated where reasonable,

practicable and proportionate in all the circumstances of the case. Nevertheless, there may be circumstances where it would not be reasonable for the Trust to accommodate a particular adjustment and in such circumstances, it will ensure that it provides the member of staff with its reasons and will try to find an alternative solution where possible.

The Trust will monitor the physical features of its premises to consider whether they place disabled staff, job applicants or service users at a substantial disadvantage compared to other staff. Where reasonably practicable and proportionate, we will take steps to improve access for disabled staff and service users.

The Trust has 'Disability Confident Employer' recognition and maintains a commitment to the upkeep of this status.

### **Fixed-Term Employees and Agency/Temporary Workers**

We will monitor the use of fixed-term employees and agency workers, and their conditions of service to ensure they are being offered appropriate access to benefits, training, promotion and permanent employment opportunities. We will also, where relevant, monitor their progress to ensure that they are accessing permanent vacancies.

### **Part-Time Workers**

We will monitor the conditions of service of part-time employees and their progression to ensure that they are being offered appropriate access to benefits and training and promotion opportunities. We will also ensure that requests to alter working hours are dealt with appropriately under our **Flexible Working Policy**.

### **Complaints of Discrimination, Victimisation and Harassment on the Protected Characteristics**

We will treat all complaints of discrimination, harassment or victimisation related, or connected to, any of the protected characteristics made by staff, students or third parties seriously and will take action where appropriate.

Any member of Staff who considers that they may have been unlawfully discriminated against, victimised or harassed within the meaning of this policy should discuss the matter in the first instance with their Line Manager/Headteacher or, if they do not consider this to be appropriate, with the CEO. It is hoped that in most cases, it may be possible to resolve the matter informally and reach a satisfactory resolution. If a member of staff wishes to make a formal complaint, they should raise the matter in accordance with the Trust's **Grievance Policy & Procedure**.

Allegations regarding potential breaches of this policy will be treated in confidence and will be investigated in accordance with the relevant procedure and the member of staff will be given the opportunity to respond to the allegation and provide an explanation for their actions.

Staff who make such allegations in good faith will not be victimised or treated less favourably as a result. If we conclude that the allegations are false or have been made maliciously or in bad faith, we will deal with the matter in accordance with our **Disciplinary Policy and Procedure**. Any member of staff who is

found to have committed an act of discrimination or harassment will be subject to disciplinary action. Such behaviour may constitute gross misconduct and, as such, may result in summary dismissal. We take a strict approach to serious breaches of this policy.

## **6. Development of the policy**

This policy was developed in consultation with all stakeholders. It is part of our commitment to promoting equalities and providing an inclusive educational environment.

### **6.1 The Equality & Diversity Group**

The Trust facilitates a cross-Trust 'Equality & Diversity Group', with voluntary members recruited from across its provisions. The aim of this Group is to support wider equality and diversity matters in both the staff and pupil populations, to discuss current procedures and give thought to enhanced promotion of the Trust's values in this area.

### **6.2 Publishing Equality Objectives—See Appendix 1**

The objectives which we identify represent the Trust's priorities and are the outcome of a careful review and analysis of data and other evidence. They also take into account national and local priorities and issues.

We evaluate our success in meeting the Public Service Equality Duty by the extent to which we **achieve improved outcomes** for the different groups. We produce equality data analysis which inform our discussions about the Equality Objectives we set.

### **6.3 Monitoring and reviewing objectives**

We review and update our equality objectives every three years and report annually to Trustees on progress towards achieving them. We involve and consult staff, students, governors and parents and carers.

We publish an evaluation of the success in meeting these objectives for parents and carers, on the Trust website.

## **7. Roles and Responsibilities**

We expect all members of the Trust community and visitors to support our commitment to promoting equalities and meeting the requirements of the Equality Act. We will provide training, guidance and information to enable them to do this.

### **The Board of the Trust**

The Board is responsible for ensuring that the Trust complies with legislation, and that this policy and its related procedures and action plans are implemented. The Curriculum & Standards Committee has a watching brief regarding the implementation of this policy.

Every Trust or academy committee keeps aspects of the Trust's commitment to the Equality Duty under review, for example, in terms of standards, curriculum, admissions, exclusions, personnel issues and the school environment. The Board reviews the Equality Policy and evaluates the success of the Trust's equalities work, taking account of quantitative evidence (e.g. data) and qualitative evidence (e.g. surveys).

### **Headteacher and Leadership Team**

The Headteacher is responsible for implementing the policy; for ensuring that all staff are aware of their responsibilities and are given appropriate training and support; and for taking appropriate action in any cases of unlawful discrimination.

### **Teaching and Support Staff**

All teaching and support staff will:

- Promote an inclusive and collaborative ethos in their classroom
- Challenge prejudice and discrimination
- Deal fairly and professionally with any prejudice-related incidents that may occur
- Plan and deliver curricula and lessons that reflect the Trust's principles, for example, in providing materials that give positive images in terms of race, gender and disability
- Maintain the highest expectations of achievement for all students
- Support different groups of students in their class through differentiated planning and teaching, especially those who may (sometimes temporarily) find aspects of academic learning difficult.
- Keep up-to-date with equalities legislation relevant to their work and attend training
- Support this policy

We will provide guidance on equality for all staff new to the Trust as part of the induction procedure.

### **Visitors**

All visitors to the Trust or one of the academies, including parents & carers are expected to support our commitment to equality and comply with the duties set out in this policy.

### **Key Contacts**

Individuals wishing to discuss aspects of this policy should contact either the CEO or the Chair of Trustees directly.

## **8. Monitoring and Reviewing the Policy**

We will review the policy bi-annually and review progress on the equalities objectives annually at Board of Trustee Meetings

## **9. Disseminating the Policy**

The Equality Policy along with the Equality Objectives and data is available:

- On the Trust website
- As paper copies on request in the Trust or Academy offices

We ensure that the whole Trust community knows about the policy objectives and this could be through the school or Trust newsletter, assemblies, staff meetings and other communication.

## Appendix 1

### SEAX Trust Equalities' Objectives 2024-27

Objective	Actions	Lead
<b>Educational Objectives</b>		
To ensure that every academy in our Trust has an appropriate and engaging environment in which our young people can thrive	Review of all Trust estate to include facilities comparisons and to further develop the document relating to what every SEAX School environment must have to engage learners	CEO / Trust Estates Manager
	To engage young people in discussions and decisions about school environments so that they have "ownership" of the strategic environment plan	Headteachers
	Develop and implement a school environment plan which ensures young people have access to the best quality equipment, ICT and play opportunities whatever SEAX school they attend	CEO/Trust Estates manager/ CFO/ Headteachers/ Trustees
To ensure that all pupils are given equal opportunities to take part in the curriculum and extra curriculum activities	Monitor attendance at all extra curricula events across all schools to include identified groups Girls/boys, pupil premium, disabilities, ethnic background etc (identified to reflect population of schools)	Headteachers reporting to LGGs
	Monitor school attendance and exclusions to ensure that no identified group has more exclusions or lower attendance	Director of Academy Improvement / Headteachers
To ensure that our curriculum and pedagogical approaches allow for the flexibility necessary to engage our young people and ensure that they make progress from their starting points	Develop a Trust excellent teaching model which is shared with all staff	Director of Academy Improvement
	Staff training on appropriate approaches to meeting varying special educational needs – on going	Director of Academy Improvement / Headteachers/ Trust Curriculum Leaders
<b>Operational Objectives</b>		
To ensure that all staff have equality of opportunity in training	To monitor the opportunities for all staff across the Trust by identified group	Director of HR
	To develop a "curriculum " of training for all staff with opportunities for all to learn and develop through high – quality Trust provided training	Director of Academy Improvement / CEO
To develop our workforce strategy to include ongoing 'Disability Confident Employer' status	To identify the necessary developments needed across the Trust to achieve this	CEO/ Director of HR
	To develop and implement an action plan across the Trust	CEO/ Director of HR
	To employ people with Special Educational needs across the Trust where the role is appropriate and to provide support as they develop into the role	CEO / Director of HR
	To renew and maintain the award	Director of HR

To continue to develop the Equality & Diversity cross-Trust Group	To formalise an action plan for further development of the Group, including individual and wider staff training opportunities	Director of HR/CEO
	To maintain open discussion within the Group, by encouraging an open agenda	Director of HR
To maintain on-going equality in employment	Review of all pre-employment and employment-related policies and procedures to ensure equality is upheld.	Director of HR
	Working with the Headteachers in order to monitor and improve the Trust's Gender Pay Gap.	Director of HR



## Appendix 2

### Sexual Harassment

The Trust has a culture of zero tolerance towards sexual harassment.

In line with this culture, the Trust will:

- attempt to remove or reduce risks of sexual harassment, to ensure the workplace is a safe place
- offer support to anyone involved in a sexual harassment complaint
- ensure that everyone within the Trust community understands that sexual harassment will not be tolerated, including forms of harassment made on personal/work devices
- train the Trust community to recognise sexual harassment and encourage them to report it
- ensure that policies are consistent in having zero tolerance of sexual harassment
- review the effectiveness of the above in light of any sexual harassment complaints and make changes accordingly

#### Definition of sexual harassment

Sexual harassment is unwanted, unwelcome or unbidden behaviour of a sexual nature. The Equality Act 2010 protects the following people against sexual harassment at work:

- employees and workers
- contractors and self-employed people hired to personally do the work
- job applicants

To be sexual harassment, the unwanted behaviour must have either:

- violated someone's dignity, whether it was intended or not
- created an intimidating, hostile, degrading, humiliating or offensive environment for them, whether it was intended or not

Whilst employers should do all they can to try to prevent sexual harassment happening in the first place, anyone who sexually harasses someone at work is responsible for their own actions.

Sexual harassment can happen to people of any gender identity or sexual orientation. It can be carried out by anyone of the same sex, a different sex or anyone of any gender identity.

You could experience sexual harassment from anyone you come into contact with because of your job, including:

- someone you work with
- a manager, supervisor or someone else in a position of authority
- someone high profile or influential

You can also experience sexual harassment from a third party or member of the public.

Sexual harassment can be a one-off incident or an ongoing pattern of behaviour.

It can happen in person or in other ways, for example online through things like email, social media or messaging tools.

Examples include:

- flirting, gesturing or making sexual remarks about someone's body, clothing or appearance
- asking questions about someone's sex life
- telling sexually offensive jokes
- making sexual comments or jokes about someone's sexual orientation or gender reassignment

- displaying or sharing pornographic or sexual images, or other sexual content
- touching someone against their will, for example hugging them
- sexual assault or rape

What some people might consider as joking, 'banter' or part of their workplace culture is still sexual harassment if:

- the behaviour is of a sexual nature
- it's unwanted
- it violates someone's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment for them

Sexual harassment is usually directed at an individual, but it's not always the case. Sometimes there can be a culture of sexual harassment in a workplace that's not specifically aimed at one person – such as sharing sexual images. Someone could still make a complaint of sexual harassment in this situation.

The Equality Act 2010 protects people against sexual harassment and harassment related to 'protected characteristics', for example a person's sex.

At work, the law covers:

- employees and workers
- contractors and self-employed people hired to personally do the work
- job applicants

Sexual harassment is different to harassment related to a person's protected characteristic, for example sex, sexual orientation or gender reassignment. Someone could experience both types of harassment at the same time, or separately.

### **Example**

Tracy is the only woman in her team. Her supervisor, Michael, regularly makes comments about women that Tracy finds insulting, for example saying their industry should not let women in. This is **harassment related to a person's sex**.

Michael starts making sexual comments about Tracy's body, getting very close to her and resting his hand on her arm. It makes Tracy feel very uncomfortable and intimidated. This is **sexual harassment**. Tracy can make a complaint that includes both types of harassment.

### **Complaints**

Sexual harassment complaints will be dealt with under the Trust's Grievance Procedure for employees and under the Trust's Complaints Policy for external parties.

It is important that complaints are reported in order that they can be dealt with promptly and by following the procedures in place. Options for reporting a sexual harassment complaint will depend on personal preference, but could include:

- an individual line manager
- a more senior leadership member or Headteacher
- a pastoral or HR Lead or a member of the Trust's Wellbeing or Equality & Diversity Groups
- the Director of HR, CEO or member of the Executive Team
- a member of the Local Governance Group or Trustee

Both the Grievance Procedure and Complaints Policy contain a range of options for dealing with a sexual harassment complaint. All complaints, except the most serious, will be dealt with informally wherever possible and this is aided by individuals being encouraged to report any issues early. If the informal approach does not work, or if the case is deemed particularly serious from the start, the formal procedure will be adopted without delay. Please see the **SEAX Trust Grievance Procedure** and the **SEAX Trust Complaints Policy** for further details.

### **Support**

Following a sexual harassment complaint, help and support for both the person making the complaint and the person they're complaining about will be made available. This may include:

- Coaching, mentoring or counselling
- The Trust's employee assistance programme or support helpline
- Occupational Health referral

If an individual is found to have been sexually harassed, additional support will be made available to them in relation to any resulting physical or mental health problems.

### **Summary**

Employees and other individuals within the SEAX community must remain clear that:

- Sexual harassment is against the law
- The Trust will never cover up or ignore a sexual harassment complaint
- The Trust will not tolerate misuse of power in workplace relationships, for example through seniority or influence
- Staff are encouraged to report sexual harassment early, even if it is not aimed at them
- If an employee carries out sexual harassment, it may lead to dismissal
- A member of staff who makes a complaint that's not upheld will not face any disciplinary action, as long as their complaint was not malicious.