

Equality, Diversity, and Inclusion Policy

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Equality and Inclusion Statement

Apex Specialist Education and all learning centres are committed to equality, inclusion, belonging and respect. This statement applies to every school policy and guides our work across all learning centres.

We promote equality of opportunity, value diversity and work to eliminate discrimination, harassment and victimisation. In accordance with the Equality Act 2010 and the Special Educational Needs and Disability Code of Practice, we provide an inclusive education that enables all pupils to participate fully, overcome barriers, develop their potential and achieve positive outcomes.

We recognise diversity as a strength to be respected, celebrated and reflected throughout school life. We strive to ensure everyone feels safe, valued, represented and that they belong. This commitment informs our governance, leadership, safeguarding, curriculum, provision and practice.

Our Commitment:

We are committed to:

- Eliminating discrimination, harassment, victimisation and other conduct prohibited by the Equality Act 2010.
- Advancing equality of opportunity between people who share a protected characteristic and those who do not.
- Fostering good relations between people who share a protected characteristic and those who do not.

Putting our Commitment into Practice:

The Proprietor, Governing Board and Leadership Team will:

- Consider equality implications and the impact of decisions, policies and practice on people with protected characteristics.
- Embed equality, accessibility and inclusion in the development and review of curriculum, provision and policies.
- Identify and seek to reduce or remove barriers to participation, learning, attendance, wellbeing and engagement.
- Promote belonging, positive relationships and high aspirations, particularly for pupils experiencing disadvantage or additional barriers.
- Respond to prejudice-based and discriminatory behaviour, including through safeguarding procedures where relevant.
- Monitor the implementation and impact of equality and inclusion across all learning centres.

Our commitment encompasses the protected characteristics identified in the Equality Act 2010: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

All members of our school community share responsibility for upholding equality, inclusion, belonging and respect in their conduct, relationships and implementation of school policies.

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1. Statement and Vision

We aim to provide an education and workplace in which people feel safe, respected and able to participate. High expectations will be supported by accessible teaching, appropriate provision and positive relationships.

We recognise that pupils may experience several barriers at once, including disability, communication needs, disadvantage, disrupted education, discrimination or adverse experiences. Staff will consider the individual rather than make assumptions from a diagnosis or group identity.

We oppose unlawful discrimination in admissions, education, activities, sanctions, access to facilities and employment. Recruitment, pay, benefits, promotion, training, flexible working, leave, grievance, discipline, redundancy and dismissal will be managed using fair, relevant criteria.

This policy supports the school's safeguarding, SEND, admissions, attendance, behaviour, accessibility, staff conduct and complaints arrangements.

2. Legislation and Guidance

The principal legislation is the Equality Act 2010. The school also applies the Education (Independent School Standards) Regulations 2014, as amended, and relevant safeguarding, employment and data-protection requirements.

The Act identifies nine protected characteristics: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation. The scope of protection differs between employment, school education and other activities. In the school-pupil provisions, age and marriage and civil partnership are not protected characteristics. This does not reduce the school's commitment to respectful treatment.

Sex and gender reassignment are separate protected characteristics. The school will apply the legal meaning of sex following the Supreme Court's 2025 judgment and maintain protection against gender reassignment discrimination. Medical treatment is not a prerequisite for protection under the gender reassignment provisions.

The school will use current DfE and EHRC guidance alongside legislation and relevant judgments. Consultation documents will not be treated as final guidance. Where an older publication conflicts with later law, the school will follow the law and seek advice where needed.

2.1 Public Sector Equality Duty

Independent-school status does not automatically make the school subject to all the public-sector specific duties. The general duty may apply when an organisation exercises public functions. The proprietor will assess its application to relevant functions and commissioning arrangements and comply where applicable.

As an organisational commitment, Apex will consider the need to eliminate unlawful discrimination, advance equality of opportunity and promote good relations throughout its work. Annual reporting and equality objectives in this policy are school commitments; they are not presented as an automatic requirement under the Equality Act 2010 Specific Duties Regulations 2011 for every

independent school.

2.2 Accessibility and SEND

The school will meet applicable reasonable-adjustment and accessibility-planning duties. It will work with commissioners to secure agreed EHC-plan provision and use the SEND Code of Practice to inform practice, recognising that particular statutory duties depend on the school's status and circumstances.

3. Roles and Responsibilities

3.1 Proprietor and Governing Board

The proprietor retains responsibility for compliance. The proprietor and Governing Board will approve this policy, oversee objectives, provide resources, scrutinise patterns and ensure that concerns lead to action.

The designated governor or proprietor representative will meet the Headteacher and the Safeguarding, Behaviour, and Inclusion Lead at least half-termly, as an Apex monitoring commitment. Findings and actions will be reported through governance arrangements.

3.2 Headteacher

The Headteacher leads implementation, delegates specific actions, ensures staff training and reports progress. Significant concerns, repeated disparities and unmet adjustments will be escalated promptly.

3.3 DSL SENCO and Centre Leaders

The whole-school lead for Safeguarding, Behaviour, and Inclusion coordinates safeguarding responses to discriminatory abuse. The SENCO advises on disability, SEND and adjustments. Centre leaders check that agreed arrangements operate in daily practice and that pupils can access support across all centres.

3.4 Staff Pupils and Families

All staff must model respectful conduct, implement adjustments, challenge inappropriate behaviour safely and report concerns. Pupils will be taught accessible ways to raise concerns and supported to respect others. Families and visitors are expected to act respectfully and may request communication or access support.

4. Eliminating discrimination

4.1 Understanding Prohibited Conduct

Staff will receive guidance on direct and indirect discrimination, discrimination arising from disability, failure to make reasonable adjustments, harassment and victimisation. Decisions must account for the applicable legal tests and exceptions rather than assume all differences of

treatment are unlawful.

Unwanted discriminatory or sexual behaviour, bullying and retaliation are unacceptable. The school will address prejudicial behaviour even where the precise legal definition of harassment does not apply to the characteristic or context concerned.

4.2 Pupils and Safeguarding

Staff must respond promptly to racist, disablist, sexist, homophobic, biphobia, transphobic, religious and other prejudicial abuse, including online incidents affecting school life. The school will consider the experiences of pupils who are perceived to have a characteristic or are targeted because of someone they associate with.

Staff will record concerns, protect and support affected pupils and involve the DSL where harm or risk is indicated. The response will consider the needs of every child involved without excusing harmful behaviour. Sexual harassment and violence will follow the safeguarding procedures.

Pupils will have accessible reporting routes, including a trusted adult and alternatives to verbal disclosure. Staff will explain next steps and must not promise absolute confidentiality.

4.3 Employment

Selection and progression will use criteria relevant to the role and be consistent with safer recruitment. Reasonable adjustments will be considered for applicants and staff, including at interview, induction and return to work.

The school will review working arrangements where disability, pregnancy, maternity or other protected circumstances require consideration. Staff may raise concerns through their manager, the grievance procedure or an alternative senior route where there is a conflict of interest.

Apex Specialist Education will take reasonable steps to prevent sexual harassment at work, including assessing risks from colleagues and third parties, communicating standards, training staff and responding to concerns. The proprietor will keep this approach aligned with employment law as changes come into force.

No person will be penalised for making or supporting a protected complaint in good faith. Allegations concerning staff that raise safeguarding concerns will follow the allegations-management procedure without waiting for a grievance outcome.

4.4 Training

New staff will receive equality and inclusion training at induction. Refresher training will take place each September, with additional briefings when law, guidance or school needs change. Leaders will check understanding through supervision, case review and everyday practice.

5. Advancing equality of opportunity

5.1 Teaching support and participation

Staff will identify barriers to learning, attendance and participation, then agree and review support. Adjustments may include communication aids, accessible materials, assistive technology, sensory arrangements, adapted teaching and changes to routines.

The school will consider disability-related needs before imposing sanctions or deciding that a pupil cannot participate in an activity. Staff must not use a blanket assumption about disability or SEND to exclude a pupil from an opportunity.

School trips, enrichment, careers education, leadership opportunities and pupil voice will be accessible. Religious observance, dietary needs, uniform, pregnancy and health needs will be considered individually within relevant legal and safeguarding requirements.

5.2 Accessibility Planning

The proprietor will maintain and implement a written accessibility plan covering curriculum participation, improvements to the physical environment and accessible information for disabled pupils. It will identify actions, responsibility, resources and review arrangements, informed by pupils and families.

The plan will be available for inspection on request. The school will review practical barriers at each centre and when premises or provision change. Physical access planning complements the duty to make reasonable adjustments in teaching, practices and auxiliary aids and services.

5.3 Supporting Gender Questioning Pupils

Pupils will be listened to respectfully and protected from bullying. The Headteacher and DSL will coordinate individual support under KCSIE 2026 and the Safeguarding and Child Protection Policy. Staff must not promise secrecy or make unilateral commitments about social transition.

Parents will normally be involved, with any safeguarding reason for withholding information assessed and recorded. Individual arrangements will consider welfare, privacy, age, needs, current guidance and the rights of other pupils and staff.

Toilet and changing arrangements will meet the applicable premises requirements and KCSIE guidance on sex-based facilities. Suitable private alternatives will be considered where needed. Sports arrangements will reflect safety, fairness and the current guidance. Decisions and reviews will be recorded sensitively.

5.4 Equality in Qualifications, Assessments and Examinations

Apex Specialist Education will provide fair access to qualification programmes, assessments and examinations. Decisions about qualification selection, entries, support and withdrawals will be based on individual evidence and the applicable qualification requirements. Disability, SEND, a diagnosis or an Education, Health and Care plan must not be used as a blanket reason to exclude

a learner from a qualification or assessment opportunity.

Janine Taylor, SENCo, will coordinate the identification of assessment access needs and the evidence required for access arrangements and reasonable adjustments. Daniel Young, Examinations Officer, will coordinate the administrative arrangements and submissions. Matthew McCann, Head of Centre for Qualifications and Examinations, will ensure that appropriate resources, competent staff and oversight are available.

Arrangements will follow the current requirements of the relevant awarding organisation and, where applicable, JCQ. The centre will distinguish arrangements it may authorise from those requiring awarding organisation approval. A diagnosis or Education, Health and Care plan does not automatically establish entitlement to a particular examination arrangement.

The centre will identify needs early, gather evidence of the learner's normal way of working where required, check assessor qualifications and competence, and obtain necessary approvals before implementing arrangements. Temporary illness or injury will be considered through the applicable procedure. Adjustments must preserve the assessment objectives and comply with qualification-specific restrictions.

The centre will not charge a disabled learner for a reasonable adjustment or auxiliary aid or service that it is legally required to provide.

Learners will receive accessible information about available support and how to request consideration of their needs. Challenges to centre decisions about access arrangements or special consideration will follow the Internal Appeals Procedure. Complaints about discriminatory treatment or failure to implement agreed support will follow the Complaints Policy, with linked procedures coordinated and relevant external deadlines protected.

Detailed arrangements are set out in the Examinations and External Assessment Policy, including its Equality and Access Arrangements section and Word Processor Policy for Examinations.

6. Promoting Good Relations

The curriculum and school culture will encourage respect for people with different backgrounds and protected characteristics. Teaching will be appropriate to pupils' age, understanding and communication needs, and reflect the Independent School Standards' requirements concerning respect, tolerance and preparation for life in British society.

RE, PSHE, relationships and sex education, literature, assemblies and wider activities will provide opportunities to explore difference and challenge stereotypes. Staff will distinguish factual teaching from contested views and comply with political impartiality requirements.

Pupils and staff may hold and express lawful religious or philosophical beliefs. Discussion must remain respectful; beliefs do not justify bullying or unlawful treatment of others. Staff will respond to conduct and context without presuming that a disagreement itself establishes discrimination.

School council and other pupil-voice opportunities will include pupils who need support to participate. Community activities and external speakers will be selected and checked through school procedures. Leaders will seek relevant specialist advice and family perspectives where

these help improve inclusion.

7. Equality Considerations in Decision Making

Staff will consider equality when planning policies, admissions, centre allocations, staffing, activities, curriculum and changes to provision. Assessment will be proportionate to the decision and recorded where significant.

The record will identify who may be affected, possible disadvantage, adjustments or alternatives, consultation, the decision and how its effects will be reviewed. This is the school's equality-impact process; it is not a requirement to complete a separate lengthy form for every routine decision.

For trips and activities, equality considerations will be recorded with the risk assessment, including access, transport, communication, religious dates, cost barriers and suitable facilities. Records will be stored securely with planning documents.

8. Equality Objectives

The school retains the following three objectives from its existing policy. The Headteacher will oversee delivery, with actions assigned through improvement planning. Progress will be reviewed termly and summarised annually.

Objective 1 Understand and address differences in achievement

Monitor achievement and progress by race, sex and disability where information is available and analysis is meaningful. Consider other relevant barriers and intersections without assuming that group membership explains an individual's outcomes.

The Headteacher and assessment lead will review data alongside individual starting points, attendance, pupil voice and provision. Identified gaps will lead to documented actions, named responsibility and follow-up. Success will be assessed through improved progress and evidence that barriers are being addressed, rather than unsupported comparisons between very small groups.

Objective 2 Improve core subject attainment for vulnerable learners

The SENCO and curriculum leaders will identify pupils whose access or progress in core subjects requires additional support, review adjustments and track the impact of agreed interventions.

Success will be evaluated against individual baselines and appropriately ambitious targets, supported by evidence of access, engagement and learning. Interventions that are ineffective will be revised rather than continued without review.

Objective 3 Improve equitable pupil and family participation

Centre leaders will review participation in learning, meetings, pupil voice and enrichment, and seek feedback through accessible methods. Barriers such as communication, disability, transport, cost or confidence will be identified and addressed.

Success will be assessed through participation records, pupil and family feedback and completion of agreed access improvements. A lack of engagement will prompt enquiry and support rather

than assumptions about families' interest.

9. Monitoring Publication and Review

Leaders will review progress, attendance, sanctions, incidents, complaints, participation and employment information where relevant and lawfully held. The school will collect only information needed for a clear purpose and will not require unnecessary disclosure of sensitive personal information.

Analysis will recognise that small cohorts can make statistics misleading or identifiable. Reports will use appropriate aggregation or narrative summaries and restrict sensitive case information. Public reporting must not identify individuals indirectly through small groups.

The school will make this policy and its equality objectives available to families and staff and publish a proportionate annual progress summary as an Apex commitment. Governors will receive sufficient confidential information to scrutinise practice without publishing personal data.

Pupils and parents can raise concerns through a trusted member of staff or the Complaints Policy. Staff concerns follow grievance or whistleblowing routes as appropriate. The school will provide accessible support and explain applicable external routes; internal processes do not remove legal rights or suspend external time limits.

This policy will be reviewed annually, and earlier where changes in law, guidance or school experience require it. The objectives will be reviewed annually and refreshed when priorities change, with a full reconsideration no later than every four years. Approval and review dates will be recorded through school policy-control arrangements.

10. References and Related Policies

The policy applies current law and final guidance; references to guidance do not extend its statutory scope. Relevant sources include the following.

- Equality Act 2010
- DfE Equality Act advice for schools
- Public Sector Equality Duty guidance
- Ofsted equality duties and the 2025 Supreme Court judgment
- EHRC gender reassignment discrimination guidance
- Independent School Standards and April 2026 guidance
- Keeping Children Safe in Education 2026
- SEND Code of Practice 0 to 25 years
- Workforce equalities requirements in schools and colleges
- Ofsted independent school inspection framework and toolkit

Related policies: Accessibility Plan; Safeguarding and Child Protection; SEND; Admissions; Attendance; Behaviour and Positive Behaviour Support; Suspension and Permanent

Exclusion; Anti-Bullying; RSHE; Staff Code of Conduct; Safer Recruitment; Grievance;
Whistleblowing; Complaints; Data Protection.