



Norfolk House School

Equal Opportunities Policy

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1. Aims

- 1.1. This is the equal opportunities policy of Norfolk House School (**School**).
- 1.2. The aims of this policy are as follows:
 - 1.2.1. to promote equal treatment within the School for all members of the School community;
 - 1.2.2. to communicate the commitment of the School to the promotion of equal opportunities;
 - 1.2.3. to create and maintain an open and supportive environment which is free from discrimination;
 - 1.2.4. to foster mutual tolerance and positive behaviours, practices and attitudes so that everyone can feel valued within the School.

2. Scope and application

- 2.1. This policy applies to the whole School including the Early Years Foundation Stage (**EYFS**).

3. Regulatory framework

- 3.1. This policy has been prepared to meet the School's responsibilities under:
 - 3.1.1. Equality Act 2010;
 - 3.1.2. Education (Independent School Standards) Regulations 2014;
 - 3.1.3. *Statutory framework for the Early Years Foundation Stage* (DfE, March 2017);
 - 3.1.4. Education and Skills Act 2008;
 - 3.1.5. Children Act 1989;
 - 3.1.6. Childcare Act 2006;
 - 3.1.7. Data Protection Act 2018 and General Data Protection Regulation (GDPR); and
 - 3.1.8. Children and Families Act 2014.
- 3.2. This policy has regard to the following guidance and advice:
 - 3.2.1. [Equality Act 2010: explanatory notes \(2010\)](#);
 - 3.2.2. [Special educational needs and disability code of practice: 0 to 25 years \(DfE, May 2015\)](#);

- 3.2.3. [Technical guidance for schools in England \(Equality and Human Rights Commission, July 2014\);](#)
 - 3.2.4. [The Equality Act 2010 and schools: departmental advice for school leaders, school staff, governing bodies and local authorities \(DfE, May 2014\);](#)
 - 3.2.5. [Gender separation in mixed schools \(DfE, June 2018\);](#)
 - 3.2.6. [Advice and Guidance: How can we stop prejudice based bullying in schools? \(Equality and Human Rights Commission\);](#)
 - 3.2.7. [Working together to safeguard children \(HM Government, July 2018 as amended in December 2020\);](#)
 - 3.2.8. [Keeping children safe in education \(DfE, updated January 2021\);](#)and
 - 3.2.9. [Relationships education, relationships and sex education \(RSE\) and health education guidance \(DfE, June 2019\).](#)
- 3.3. The following School policies, procedures, documents and resource material are relevant to this policy:
- 3.3.1. Equal Opportunities Policy for Staff;
 - 3.3.2. Admissions Policy;
 - 3.3.3. English as an Additional Language Policy;
 - 3.3.4. Policy on Discipline and Behaviour;
 - 3.3.5. School rules;
 - 3.3.6. Uniform Policy;
 - 3.3.7. Anti Bullying Policy;
 - 3.3.8. Disability Policy;
 - 3.3.9. Accessibility Plan;
 - 3.3.10. Special Educational Needs Policy;
 - 3.3.11. Relationships Education Policy;
 - 3.3.12. Risk Assessment for Pupil Welfare; and
 - 3.3.13. the terms and conditions of the contract for educational services made between the School and the parents.

4. Responsibility statement and allocation of tasks

- 4.1. The Proprietor has overall responsibility for all matters which are the subject of this policy.
- 4.2. To ensure that efficient discharge of its responsibilities under this policy, the Board of Directors has allocated the following tasks:

Task	Allocated to	When / frequency of review
Keeping the policy up to date and compliant with the law and best practice	Head of Pastoral Care	As required, and at least termly
Monitoring the implementation of the policy (ensuring its accessibility and availability), relevant risk assessments and any action taken in response and evaluating effectiveness	" " "	As required, and at least termly
Maintaining up to date records of all information created in relation to the policy and its implementation as required by the GDPR	" " "	As required, and at least termly
Seeking input from interested groups (such as pupils, staff and parents) to consider improvements to the School's processes under the policy	" " "	As required, and at least annually
Formal annual review	" " "	Annually

5. Publication and availability

- 5.1. This policy is published on the School website and in the Virtual Staffroom.
June 2021

5.2. This policy is available in hard copy on request.

6. Definitions

6.1. Where the following words or phrases are used in this policy:

6.1.1. reference to **EHC Plan(s)** is to Education and Health Care Plan(s);

6.1.2. references to **Protected Characteristics** are as defined in Chapter 1 of the Equality Act 2010;

6.1.3. reference to **PSHE** is the personal, social, health and economic education programme;

6.1.4. references to the **School community** includes staff, supply staff, directors, pupils, parents, carers, visitors and volunteers.

7. Policy statement

7.1. The School recognises the benefits of having a diverse School community, with individuals who value one another, and the different contributions everyone can make. Pupils will be taught to value and respect others and other cultures. The School is committed to being an equal opportunities education provider and is committed to equality of opportunity for all members of the School community.

7.2. In the provision of equal opportunities, the School recognises and accepts its responsibilities under law to oppose discrimination on the basis of the following Protected Characteristics:

7.2.1. disability;

7.2.2. gender reassignment;

7.2.3. pregnancy and maternity;

7.2.4. race;

7.2.5. religion or belief (including lack of religion or belief);

7.2.6. sex;

7.2.7. sexual orientation; and (in the case of adult members of the School community)

7.2.8. marital and civil partnership; and

7.2.9. age.

- 7.3. The School also opposes all bullying and unlawful discrimination on the basis that a person has a special educational need or learning difficulty, or because English is an additional language.
- 7.4. The School aims to ensure that all policies and practices conform with the principle of equal opportunities. The School will tackle inappropriate attitudes, behaviours and practices through staff leading by example, through the PSHE, relationships education policy and programmes, through the supportive School culture and through the School's wider policies.

8. Discrimination

- 8.1. Discrimination may be direct or indirect, or arising from disability and it may occur intentionally or unintentionally. This policy covers the following forms of discrimination:

- 8.1.1. **Direct discrimination:** direct discrimination occurs when a person is treated less favourably than another person because of a Protected Characteristic. For example, rejecting an applicant of one race because it is considered they would not "fit in". This would be a decision based on grounds of their race and would be direct discrimination. Direct discrimination also occurs when a person is treated less favourably because of their association with another person who has a protected characteristic (other than pregnancy or maternity). For example, if a pupil is harassed or victimised because a sibling is disabled, this would be direct discrimination against that pupil.

- 8.1.2. **Indirect discrimination:** indirect discrimination occurs where an individual is subject to an unjustified provision, criterion or practice which puts them at a particular disadvantage because of, for example, their sex or race. For example, a minimum height requirement would be likely to eliminate proportionately more women than men. If these criteria cannot be objectively justified for a reason unconnected with sex, they would be indirectly discriminatory on the grounds of sex.

- 8.1.3. **Discrimination arising from disability:** discrimination arising from disability occurs when a disabled person is treated unfavourably because of something connected with their disability and the treatment cannot be shown to be a proportionate means of achieving a legitimate aim. For example, where a pupil with cerebral palsy who is a wheelchair user is told they will be unable to attend a school trip because there is no wheelchair access available and other options are not investigated.

9. Admission

- 9.1. **Applicants:** the School accepts applications from, and admits pupils irrespective of their sex, gender reassignment, race, disability, sexual orientation, pregnancy and maternity or religion or belief or special educational needs (**SEN**) and will not discriminate on these grounds in the terms on which a place is offered. The School will treat every application in a fair, open-minded way.
- 9.2. **Selection:** every application will be considered on its merits within the School's criteria for selection on grounds of the pupil's ability and aptitude, but this will not be done as a way of excluding pupils with a disability or special educational needs, subject to section 13 below.
- 9.3. **Admissions policy:** the School's admissions policy reflects the School's approach towards equal opportunities for prospective pupils and is consistent with this policy.

10. Education and associated services

- 10.1. **Equal access:** the School will afford all pupils equal access to all benefits, services, facilities, classes and subjects including all sports, irrespective of their sex, gender reassignment, race, disability, sexual orientation, pregnancy and maternity or religion or belief or special educational needs, subject to overriding considerations of safety and welfare.
- 10.2. **Positive action:** the School may afford pupils of a particular racial group, or pupils with a disability or special educational needs, access to additional education or training to meet the special needs of the pupils in that group, for example, special language training for groups whose first language is not English.
- 10.3. **Exclusions:** the School will not discriminate against any pupil by excluding him / her from the School, or by subjecting him / her to any other detriment, on the grounds of his / her sex, gender reassignment, race, disability, sexual orientation, pregnancy and maternity or religion or belief, or special educational needs.
- 10.4. **Teaching and School materials:** efforts are made to recognise and be aware of the possibility of bias (for example, on the grounds of sex or race), so that this can be eliminated in both the School's teaching and learning materials and teaching styles. Materials are carefully selected for all areas of the curriculum so as to avoid stereotypes and bias.
- 10.5. **Pupil interaction:** all pupils are encouraged to work and play freely with, and have respect for, all other pupils, irrespective of their sex, gender reassignment,

race, disability, sexual orientation, religion or belief or pregnancy and maternity or special educational needs, subject to considerations of safety and welfare. Positive attitudes are fostered towards all groups in society through the curriculum and ethos of the School, and pupils will be encouraged to question assumptions, stereotypes and negative behaviours and practices. The School's PSHCE and relationships education curriculum encourages respect for other people, with particular regard to the Protected Characteristics.

10.6. **Bullying:** the School will not tolerate bullying (including cyberbullying and prejudice-based bullying) for any reason. Specific types of bullying include:

10.6.1. bullying relating to race, religion, belief or culture;

10.6.2. bullying related to SEN, learning difficulties or disabilities;

10.6.3. bullying related to appearance or health conditions;

10.6.4. bullying relating to sexual orientation;

10.6.5. bullying of young carers or looked after children or otherwise related to home circumstances;

10.6.6. sexist or sexual bullying or bullying related to gender reassignment.

See the School's Anti Bullying Policy.

11. **School uniform**

11.1. **The School uniform policy is consistent with this policy:** the same School uniform policy applies equally to all pupils, irrespective of their sex, gender reassignment, race, disability, sexual orientation, pregnancy and maternity or religion or belief or special educational needs, subject to considerations of safety and welfare. However, the School will consider reasonable requests to alter the School uniform, for example, for genuine religious requirements and reasonable adjustments for disabled children. See the School's Uniform Policy.

11.2. **Symbols of faith:** certain items of jewellery, such as the Kara bangle worn by Sikhs, and certain items of headwear, such as the turban and headscarves may be worn by pupils when doing so is genuinely based on manifesting religious or racial beliefs or identity. This is subject to considerations of safety and welfare and the School's existing School uniform policy principles (in regards to, for example, the School colours). Where there is uncertainty as to whether an item may be worn under this section, the issue must be referred by the pupil or his / her parents to the Headmistress, whose decision will be final, subject to the complaints procedure.

11.3. **Disabled pupils:** reasonable adjustments may be required to the School uniform for disabled pupils who require them. The pupil or his / her parents should refer the matter to the Headmistress to ensure all reasonable adjustments are made to accommodate the pupil.

12. Religious belief

12.1. **Religion:** the School's religious ethos, services and school timetable are set in accordance with the Christian tradition, but the School respects the right and freedom of individuals to worship in accordance with other faiths, or no faith, subject always to their respecting the rights and freedoms of the School community as a whole and considerations of safety and welfare.

13. Disability and special educational needs

13.1. **Our approach:** we are an inclusive School which welcomes members of the School community with disabilities and special educational needs. We maintain and drive a positive culture towards inclusion of disabled people and those with special educational needs in all the activities of the School and we will not treat a member of the School community less favourably on these grounds without justification. At present, our facilities, physical and otherwise, for the disabled and those with special educational needs are limited. However, we will do all that is reasonable to ensure that the School's curriculum, ethos, culture, policies, procedures and premises are made accessible to everyone. Our Disability Policy and Policy on Special Educational Needs are consistent with this policy.

13.2. **Reasonable adjustments:** the School has an on-going duty to make reasonable adjustments for disabled pupils including pupils with special educational needs where this falls within the definition of "disability" in respect of the education and associated services provided to ensure that such pupils are not placed at a substantial disadvantage in comparison with other pupils. This is a broad expression that covers all aspects of School life, for example:

13.2.1. the curriculum;

13.2.2. classroom organisation and timetabling;

13.2.3. access to School facilities;

13.2.4. clubs and visits;

13.2.5. School sports; and

13.2.6. School policies.

13.3. Reasonable adjustments may typically include:

- 13.3.1. making arrangements for a child in a wheelchair to attend an interview in an accessible ground floor room;
 - 13.3.2. allowing extra time for a dyslexic child to complete an entrance exam;
 - 13.3.3. providing examination papers in larger print for a child with a visual impairment;
 - 13.3.4. rearranging the timetable to allow a pupil to attend a class in an accessible part of the building;
 - 13.3.5. arranging a variety of accessible sports activities.
- 13.4. In making reasonable adjustments the School is required to provide auxiliary aids and services for disabled pupils where to do so would be reasonable. The School will carefully consider any proposals made by parents and will not unreasonably refuse any requests for such aids and services.
- 13.5. As well as providing educational services, the School provides services to the public, for example at:
- 13.5.1. open days;
 - 13.5.2. parents' evenings;
 - 13.5.3. concerts and plays;
 - 13.5.4. exhibitions;
 - 13.5.5. conferences (including residential conferences during holiday periods);
 - 13.5.6. use of sports facilities.
- 13.6. When providing such services the School will make reasonable adjustments to ensure that disabled people are able to use the School's services as far as is reasonable to the same extent and standard as non-disabled people.
- 13.7. For reasonable adjustments for staff please see the equal opportunities policy for staff.
- 13.8. **Informing the School:** in accordance with the School's terms and conditions, parents of pupils must notify the Headmistress in writing if they are aware or suspect that the pupil (or prospective pupil) has a disability or if the pupil (or prospective pupil) has a learning difficulty. The Application Form enables prospective parents to give details of their child's disability when applying for a place at the School. Parents must provide copies of all written reports and other relevant information upon request. Providing the School with such information will enable the School to support the pupil as much as possible. Confidential information of this kind will only be communicated on a "need to

know" basis. The School will have due regard to any request made by a parent or pupil (who has sufficient understanding of the nature and effect of the request) to treat the nature or existence of the person's disability as confidential.

13.9. Admission of children with a disability or special educational need:

applications for a place at the School will be considered on the basis that reasonable adjustments have been made by the School in order to cater for the child's disability or other arrangements for a child's special educational need where this does not fall within the definition of "disability". The School will not offer a place if, after all reasonable adjustments or other arrangements have been made, the School will not be able to provide adequately for the pupil's physical and educational needs. The School shall inform the parents of their decision and give details of the reasonable adjustments or other arrangements they are going to make or give reasons why an offer of a place has not been made.

13.10. Existing pupils: where the School becomes aware of a disability of an existing pupil or the special educational need of an existing pupil where this does not fall within the definition of "disability", the School will do all that is reasonable to assist the pupil whilst at the School, which may include making reasonable adjustments or other arrangements. If in the professional judgement of the Headmistress, and after consultation with the parents and the pupil (where appropriate), the School cannot provide adequately for the pupil's physical and educational needs after all reasonable adjustments or other arrangements have been made, parents will be asked to withdraw the pupil, without being charged fees in lieu of notice and with the acceptance deposit returned. The School will do what is reasonable to help parents to find an alternative placement which will provide their child with the necessary environment and level of teaching and support.

13.11. Access: the School will monitor the physical features of its premises to consider whether disabled users of the premises are placed at a substantial disadvantage compared to other users. Where possible and proportionate, the School will take steps to improve access for disabled users of the premises. The School has an Accessibility Plan, which is kept under review and revised as necessary. The Plan is available on request from the Headmistress.

14. Pupils with EHC Plans

14.1. The School's policy on special educational needs includes details about the welfare and educational provision for pupils with EHC Plans.

15. Pupils with English as an additional language

15.1. Pupils with English as an additional language will receive additional learning support if necessary. The School will consult with the pupil and the parents as appropriate. The School has appropriate welfare support for all such pupils. See also the School's English as an Additional Language Policy.

16. Provision for pupils with particular religious, dietary, language or cultural needs

16.1. The School welcomes children from all religious and cultural backgrounds and celebrates such diversity in PSHCE lessons, assemblies, religious studies lessons and school outings. The school is committed to providing equal opportunities for all its pupils.

16.2. The School is able to cater for most special dietary requirements, whether arising from religious and cultural practices or allergies and food intolerances. Parents notify the School of such requirements when their child joins the school and at least annually thereafter. Individual plans are agreed for each child and the catering department is informed accordingly. Information cards for all children who have allergies or food intolerances are prominently displayed in the kitchen, the servery area of the dining hall and the medical suite. Systems are in place to ensure that Epi-pens or other appropriate prescription medication is available at all times.

16.3. The School will make every effort to support pupils with particular religious and cultural needs, provided the same are consistent with the law and the inclusive ethos and tradition of the school. Wherever possible the School will grant leave of absence for religious reasons. All requests should be addressed to the Headmistress.

17. Training

17.1. The School ensures that regular guidance and training is arranged on induction and at regular intervals thereafter so that staff and volunteers understand what is expected of them by this policy and have the necessary knowledge and skills to carry out their roles.

17.2. The level and frequency of training depends on the role of the individual member of staff.

17.3. The School maintains written records of all staff training.

18. Risk assessment

- 18.1. Where a concern about a pupil's welfare is identified, the risks to that pupil's welfare will be assessed and appropriate action will be taken to reduce the risks identified.
- 18.2. The format of risk assessment may vary and may be included as part of the School's overall response to a welfare issue, including the use of individual pupil welfare plans (such as behaviour, healthcare and education plans, as appropriate). Regardless of the form used, the School's approach to promoting pupil welfare will be systematic and pupil focused. Please see clause 4 for details of the individuals with responsibility for carrying out, monitoring, implementing and reviewing the effectiveness of risk assessments under this policy. See also the School's Risk Assessment for Pupil Welfare Policy.]

19. Record keeping

- 19.1. All records created in accordance with this policy are managed in accordance with the School's policies that apply to the retention and destruction of records.
- 19.2. All reported breaches of this policy will be recorded and this record will be reviewed annually by the Headmistress.
- 19.3. The information created in connection with this policy may contain personal data. The School's use of this personal data will be in accordance with data protection law. The School has published privacy notices on its website which explain how the School will use personal data.

20. Version control

Date of adoption of this policy	21.6.21
Date of last review of this policy	21.6.21
Date for next review of this policy	21.6.22
Policy owner (SLT)	Head of Pastoral Care
Policy owner (Board of Directors)	Chair of Directors