



FRAYS

Academy Trust

**Frays Academy Trust
Equality Policy and Equality Objectives
2024-2028**

**Date Ratified: July 2024
Review Date: July 2028**

Approval

Signed by Chair of Directors	
Date of Approval/Adoption	July 2024
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Contents

1	Scope	2
2	Principles.....	2
3	Legislative basis	2
4	Roles and responsibilities	3
	4.1 Board of Directors and Local Governing Bodies	3
	4.2 Senior leaders	3
	4.3 All staff	3
5	Our Values.....	4
6	Equality Statement	4
	6.1 Provisions for children	5
	6.1.1 Achievement	5
	6.1.2 Teaching and learning	5
	6.1.3 Behaviour and safeguarding	5
	6.2 Employment.....	5
	6.3 Retirement	6
	6.4 Ethical leadership.....	6
	6.5 Frays Workload Charter	6
	6.6 Contractors and service providers	7
	6.7 Positive Action	7
7	Equality Objectives 2024-2028.....	7
8	Consultation	7
9	Complaints	7
10	Monitoring and Evaluation.....	8
11	Related policies.....	8
	Appendix A – Definitions.....	9

1 Scope

The purpose of this policy is to state Frays Academy Trust's commitment to equality as a provider of education and as an employer. We recognise the diverse nature of our locations and schools, and aim to ensure that children, parents, Directors, Governors, staff, contractors, partners, clients, and those who may potentially join the Frays community, are treated fairly and with dignity and respect.

2 Principles

We oppose all forms of discrimination, and it is our policy and ethos to promote equality to all, irrespective of:

- Age
- Disability
- Sexual orientation
- Race (including nationality, ethnic or national origin)
- Gender (including gender reassignment)
- Religion or belief
- Pregnancy or maternity
- Marital status (including civil partnerships)
- Carer responsibilities
- Domestic circumstances
- Trade union affiliation

We undertake not to discriminate unlawfully, or treat people less favourably, on the grounds of any Protected Characteristics defined by the Equality Act 2010, or any other ground that cannot be justified.

We recognise that it is also unlawful to discriminate by association or perception, e.g. treating a student unfairly based on the Protected Characteristics of their parents or other family members.

This policy recognises the four types of unlawful behaviour. Appendix A provides these definitions.

Every step will be considered in the aim of ensuring individuals are treated fairly and decisions are based on objective criteria.

3 Legislative basis

This policy is underpinned by the Equality Act 2010 and the Public Sector Equality Duty (PSED). We have a duty to:

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

4 Roles and responsibilities

4.1 Board of Directors and Local Governing Bodies

The Board of Directors will approve this policy and are committed to ensuring that this policy is applied consistently and fairly. Local Governing Bodies will ensure that this policy is applied consistently and fairly in all aspects of school life.

When considering policies, the Directors and Governors will monitor, evaluate and review policies in line with statutory and best practice guidelines.

Each Local Governing Body will appoint a Link Governor for Special Educational Needs and Disability (SEND), with responsibility for monitoring the quality of the school's SEND provision.

Each Local Governing Body will also appoint Link Governors to monitor progress against their school's school improvement priorities. These priorities will include a focus, for example, on narrowing specific attainment gaps within the school and therefore the Link Governors have a significant role in ensuring that our schools are fulfilling their duties under the Equality Act 2010 and the PSED.

4.2 Senior leaders

- The **CEO** will ensure that this policy is applied fairly and consistently across the Trust in all our schools.
- **Headteachers** will ensure that this policy is applied fairly and consistently within their school. This includes school as an employer as well as an educational establishment.
- **School leadership teams** will be responsible for ensuring that their school offers an inclusive curriculum which promotes equal opportunity and good relations across all groups of students.
- **School leadership teams** will be responsible for ensuring that their school has in place a SEND policy, SEND information report, pastoral care policies and a Behaviour policy, all of which will promote equal opportunity and good relations across all groups of students. These policies will be based on Trust model policies provided by the Frays Central Team.
- Within each school, the **SENCO (Special Educational Needs Co-Ordinator)** is responsible for the day-to-day management and coordination of education to students with special, or disability related, needs. This provision will take into consideration the need to ensure that children with additional needs are not facing disadvantage due to their additional educational needs, disabilities, mental or physical health or any 'hidden' disabilities such as neurodivergence.
- **School leadership teams** will be responsible for ensuring that their school develops teaching and learning strategies and quality CPD (Continuous Professional Development) that ensure all staff are able to deliver inclusive learning.
- The **COO** is responsible for all employment policies and ensuring the principles of this policy are reflected in all our employment practices.
- The **CFO** and **finance staff** will monitor contractor and service provider compliance with the principles of this policy.

4.3 All staff

The role of all staff is to adhere to this policy and the spirit of the law.

5 Our Values

Our values define what we believe, the culture of Trust and our approach to implementing our Strategic Plan. As a Trust we believe in **H. O. P. E.**

- **Honesty:** We evaluate leadership and teaching critically to enable schools to inspire our children. We have a feedback culture where feedback is given with integrity, thoughtfulness and honesty.
- **Opportunity:** We welcome, research and seek innovation. Each of our schools brings a wealth of experience, difference and insight to shape the future of Frays
- **Positivity:** We collaborate with each other to innovate. Our children and staff have a growth mindset and a 'can do' approach.
- **Equality:** We are building an inclusive culture that encourages, supports and celebrates the diversity within our schools and teams. We build aspiration for all our children to achieve.

6 Equality Statement

- As a Trust, we will ensure that equal opportunities and the principles of fairness underpin all aspects of policy, procedure, education provision, consultation and decision making.
- The Trust is committed to equality in its delivery of education, whether the service is directly provided by us or contracted to a third-party provider. Senior leaders will monitor this education provision to ensure that children acquire the skills which enable them to be proactive in their behaviour and learning and to become responsible citizens.
- We aim to provide high quality education services, making sure services are easily accessible. We will improve what we do by continuing to consult with staff, children, parents, governors, local communities and other partners about equality issues. We will promote our Equality Policy in our contact with parents, staff, governors and external organisations.
- Every person has the right to be treated fairly. Where necessary we will implement reasonable adjustments or additional support to ensure equality of access to education and to suitable learning and working environments.
- Our staff and Directors who plan, agree and deliver our education provision will recognise diversity and demonstrate a proactive approach in their day-to-day work. They will ensure that everyone is treated fairly, recognising special education or physical needs and understanding differences. Behaviour will reach our high standards of conduct (staff and children) and the learning environment we provide will be safe and accessible for those studying and working.
- The Trust will adhere to legislation and consider other relevant guidance, which aims to ensure that everyone is treated equitably. We will work with other people and organisations to encourage fair treatment of all. We will collect information, which will help us plan and develop services to meet the additional needs of all members of the community.
- The Trust will not tolerate any form of discriminatory behaviour against our staff or our local communities.

6.1 Provisions for children

- Each school will ensure that children are provided with appropriate support to recognise their individual needs. This includes protection under the Equality Act extending the reasonable adjustment duty to require schools to provide auxiliary aids and services to students with disabilities.
- All policies relating to the provision of education, the curriculum, behaviour, attendance, exclusion, medical treatment and Child Protection and safeguarding policies will consider the provisions and duties of the Act.

6.1.1 Achievement

- We are committed to improving the attainment of vulnerable groups of students, including students with Special Educational Needs (SEN), students with disabilities and those entitled to Free School Meals (FSM), so that the gap between their attainment and that of other students is narrowed.
- We will aim to raise aspirations among children, their parents, and our local communities.

6.1.2 Teaching and learning

- We will ensure that our curriculum (including extracurricular activities) is broad and balanced, provides opportunities for all children, and promotes understanding between different groups of people, cultures and societies.
- Our curriculum will include an element of personal, social and health education (PSHE) that tackles stereotypes and challenges perceptions.

6.1.3 Behaviour and safeguarding

- Our Anti-Bullying Policy ensures our children, including those with protected characteristics, are protected from harassment and discrimination of all kinds.
- We will ensure the promotion of our Christian values and British values through our curriculum to support and develop our students into responsible citizens of the future.
- Our Behaviour Policy outlines how we will deal with children who use discriminatory, homophobic or otherwise offensive language.

6.2 Employment

- We are committed to ensuring that staff have equal access to recruitment and career opportunities, training, and professional development.
- We recognise that the Equality Act extends beyond the protected characteristics of an individual member of staff and has broader application. For example, a member of staff with parental or caring responsibilities for a dependent with disabilities may have rights under the Equality Act which the Trust, as the employer, would need to consider.
- All recruitment will be within the provisions of the Act, and applications will be monitored to report on recruitment activity, in line with the Act.
- We will make every effort in creating equality of opportunity for staff, ensuring these are accessible and fair to all. Where necessary we will implement reasonable adjustments or additional support to ensure equality of access to the working environment and opportunity to undertake the job role successfully.
- HR policies and procedures will be reviewed regularly to improve, adapt or amend current practices to promote equality of opportunity. All HR and employment policies will be applied consistently and fairly and refer to the provisions of the Equality Act 2010. In addition, our staff have access to a range of policies which aim to support and encourage flexibility and diversity in our workplaces.

- Protection under the Equality Act 2010 is extended to those who are pregnant, have recently given birth or are undergoing gender reassignment.
- All staff have a right to be treated with dignity and respect at work and it is expected that they treat other staff with the same dignity and respect in return. Bullying and harassment is unacceptable behaviour and unlawful. The Trust will not tolerate bullying and harassment of any kind of its staff by colleagues, parents, governors, directors, pupils, other members of the public, or third parties (such as contractor employees). Where necessary appropriate action will be taken. All staff must have regard to the Anti-Bullying and Harassment Policy and act appropriately to ensure that such conduct does not occur. Staff who are found to be blameworthy of bullying and/or harassment behaviour will be subject to the Disciplinary Policy.
- Staff who are in breach of this Equality Policy may face action under the Disciplinary Policy.

6.3 Retirement

We recognise the contributions of a diverse workforce, including the skills and experience of older staff. We do not apply a compulsory retirement age, meaning that staff remain in employment until either they choose to voluntarily retire by giving notice of this intention or the employment is ended on other grounds (e.g. redundancy, capability, or any other reason permitted under the Trust's HR policies, after application of appropriate procedures). We aim to ensure that retirement is as flexible as possible to support existing staff and assist recruitment and retention of staff and the provision of services. Staff and line managers must always refer to the relevant pension authority for current rules.

6.4 Ethical leadership

By creating a fair and just work environment, ethical leaders can help others feel valued and respected. This can lead to increased job satisfaction and a greater sense of commitment to the organisation. Additionally, ethical leaders are often more transparent and communicative, which can help to build trust and rapport. This can create a more positive work environment and reduce stress, which can lead to lower turnover rates. The National Governance Association (NGA) has developed an Ethical Leadership Framework in Education. We have taken the framework and mapped it to our Vision and Values, identifying the leadership behaviours within Frays as:

- Leaders are trustworthy and reliable
- Leaders work courageously in the best interests of children
- Leaders use experience, knowledge, and insight
- Leaders foster positivity and encouragement
- Leaders are conscientious and dutiful
- Leaders are fair and work for the good of all children

6.5 Frays Workload Charter

As part of our commitment to ensuring that our staff are not disadvantaged, we consider the duty of care towards staff and work-life balance a high priority. As such, our Workload Charter covers the use of planning and data, marking and feedback, inspections, meetings, working practices and communications.

6.6 Contractors and service providers

- Across the Trust, we will ensure that all service providers that are contracted to provide services to children, staff or visitors will comply with the Equality Act 2010.
- Where services are deemed not to meet these standards, in relation to equal opportunity and fairness, contracts may be terminated.
- Provision will be made within Service Level Agreements between the Trust, or an individual school, and service providers or contractors, that will ensure that services are made available with due regard for fairness and equality.

6.7 Positive Action

Positive action provisions allow the Trust to target measures that are designed to alleviate disadvantages experienced by, or to meet the particular needs of children with protected characteristics. Such measures, if employed, would need to be proportionate to the intended aim.

7 Equality Objectives 2024-2028

As a Trust we have set the following Equality Objectives for 2024-2028:

Equality Objective	Description	Link to Frays Vision and Values and Strategic Plan 2022-2025
A. Narrowing the achievement gap for disadvantaged children and improving well-being	Narrowing the gap between disadvantaged children and the rest of the cohort to improve outcomes and secondary school readiness. Developing local plans for schools in improving pupils' mental health and well-being.	<i>'Excellence in Learning'</i> Strategic objective 1: To raise attainment and improve outcomes for all pupils
B. Embedding ethical leadership principles and our workload charter	Securing the best from our staff while ensuring our staff are treated fairly and not disadvantaged by our working practices.	<i>'Investment in Character'</i> Strategic Objective 3: To ensure that staff engage in professional development that helps them to flourish
C. Improving data quality and information	Improving and integrating our management information systems (MIS) systems to allow better understanding of our data to improve outcomes.	<i>'Strength in Partnership'</i> Strategic Objective 5: To continue to build a strong infrastructure which is financially sustainable

Links to our operational plans will be set out annually in our Annual Equality Statement.

8 Consultation

Directors and Senior Leaders have been consulted on this policy, and its ethos and aims have their full commitment. We consult with our staff and parents regularly. We consult with our children through normal school life such as school councils as well as through less formal methods.

9 Complaints

We will treat seriously all complaints of unlawful (or potentially unlawful) discrimination. Complaints from parents, children and the community will be dealt with in line with the Trust's

Complaints Policy and, as such, appropriate staff will deal with the relevant stage of the complaint.

10 Monitoring and Evaluation

- Recruitment applications will be recorded and monitored to ensure compliance to the policy.
- Requirements of contractors and other services providers will be monitored and documented through service level agreements and contracts.
- Complaints will be monitored by the Frays Central Team and the COO will monitor any grievances brought in relation to this policy.

11 Related policies

This policy and its ethos applies to every policy, procedure and guidance document that is produced in relation to children, staff, parents, Governors and Directors.

Appendix A – Definitions

The Equality Act 2010 defines four kinds of unlawful behaviour - direct discrimination, indirect discrimination, harassment and victimisation.

- **Direct discrimination** occurs when one person treats another less favourably because of a protected characteristic, than they treat - or would treat - other people. This describes the most clear-cut and obvious examples of discrimination - for example if a school were to refuse to let a student be a prefect because she is a lesbian, or an employee was refused a promotion because of their race.
- **Indirect discrimination** occurs when a “provision, criterion or 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, or arranging the weekly CPD sessions for teachers on days when no part-time staff are available for work. 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.
- **Harassment** has a specific legal definition in the Act - it 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.
- **Victimisation** occurs when a person is treated less favourably than they otherwise would have been because of something they have done (“a protected act”) in connection with the Act. A protected act might involve, for example, making an allegation of discrimination or bringing a case under the Act, or supporting another person’s complaint by giving evidence or information, but it includes anything that is done under or in connection with the Act. Even if what a person did or said was incorrect or misconceived, for example based on a misunderstanding of the situation or of what the law provides, they are protected against retaliation unless they were acting in bad faith. The reason for this is to ensure that people are not afraid to raise genuine concerns about discrimination because of fear of retaliation.