



BRADFIELD COLLEGE

Equality and Diversity Policy

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Author:	Sarah Davies, Assistant Head (Safeguarding) and EDI Lead		
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1.3	SRD/SPW	September 2021	Additions and further clarifications arising from KCSIE September 2021
1.4	SRD	September 2022	Reviewed in the light of KCSIE 2022 and changes to SMT Pastoral structure. Updating LGBTQIA+ nomenclature Reference made to Pastoral Dashboard Amendment of 4.2 Addition of reference to Transgender pupil Guidance 6.8 Addition of 8 - reference to EDI Committee Addition of Transgender pupils guidance as Appendix to the policy
1.5	SRD	September 2023	Reviewed in the light of KCSIE 2023
1.6	SRD and SPW	November 2024	Reviewed in the light of KCSIE 2024 and the National Minimum Standards, to include specific reference to linguistic background and academic and sporting ability; review of section on SEN provision; inclusion of Personal Support Plans.
1.8	SRD	October 2026	Equality Act definitions and scope; reasonable adjustments; confidentiality; pregnancy and maternity; KCSIE 2026; boarding inclusion; reporting, governance and monitoring.

1 Introduction

Bradfield College is committed to equality of opportunity, inclusion and compliance with the Equality Act 2010. This policy explains how the College prevents discrimination and supports current and prospective pupils throughout school and boarding

The College aims to create an environment that respects pupil diversity and enables all to contribute fully, achieve their full potential, and derive maximum benefit and enjoyment from their involvement in the life of Bradfield.

The College recognises the value of every individual. Fair treatment may require different support or arrangements to remove barriers and enable pupils to participate fully.

To this end, the College acknowledges the following basic rights for every current and prospective pupil:

- The right to fair treatment without unlawful discrimination, harassment or victimisation in admissions, education, access to benefits, facilities and services, and decisions about exclusion;
- The right to appropriate encouragement and support, including reasonable adjustments for disabled pupils. The College will not charge a pupil or their family for a reasonable adjustment which it is required to make.

These rights establish responsibilities; the College requires all its employees to recognise these rights and to act in accordance with them in all dealings with members of the pupil community. The following undertakings are made:

- No pupil will be unlawfully discriminated against because of a protected characteristic. The College also opposes unfair treatment based on cultural or linguistic background, special educational needs, academic or sporting ability, social background or family circumstances. These wider commitments do not alter the statutory list of protected characteristics.
- Disabled pupils will be supported through reasonable adjustments to avoid substantial disadvantage compared with pupils who are not disabled. Staff must consider barriers in teaching, assessment, pastoral care, boarding and co-curricular activities, including trips and digital provision.

2 The Equality Act 2010

The College must comply with the Equality Act in admissions, education, access to benefits, facilities and services, and exclusion or other detriment. The Act addresses direct and indirect discrimination, discrimination arising from disability, failure to make reasonable adjustments, harassment where the statutory provisions apply, and victimisation. The College prohibits discriminatory bullying and harassment on all grounds, including where the school provisions of the Act do not provide a separate harassment claim.

As an independent school which is not an academy, the College is not subject to the Public Sector Equality Duty simply by virtue of operating as a school. It nevertheless adopts the aims of removing discrimination, widening opportunity and promoting good relations. The Independent School Standards and boarding National Minimum Standards impose their own requirements.

2.1 Protected Characteristics

The protected characteristics relevant to the Act's school pupil provisions are disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation. Race includes colour, nationality and ethnic or national origins; religion or belief includes a lack of religion or belief. Age and marriage and civil partnership are also protected characteristics under the Act, but do not apply to the school pupil provisions. The National Minimum Standards for boarding schools impose wider expectations concerning cultural and linguistic background, special educational needs, and academic or sporting ability; these are not additional Equality Act protected characteristics.

The College also protects against discrimination based on an assumed characteristic or association with another person where the Act provides for this. Pupils must not be victimised for raising an equality concern, supporting a complaint or because a parent or sibling has done so.

2.2 Disability

A person is disabled under the Equality Act if a physical or mental impairment has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. A pupil does not have to obtain a formal diagnosis before the College considers their needs or reasonable adjustments.

2.2.1 Physical Impairment

“Physical impairment” includes:

- Conditions affecting the body, such as arthritis, hearing or sight impairments, diabetes, asthma and epilepsy, where the statutory test is met;
- HIV infection, cancer and multiple sclerosis, which are treated as disabilities from diagnosis;
- Loss of a limb (or limbs) or the use of a limb (or limbs);
- Severe disfigurement, which is treated as having a substantial adverse effect, subject to the statutory exceptions.

2.2.2 Mental Impairment

“Mental impairment” includes:

Examples include dyslexia, autism, ADHD, learning disabilities and mental health conditions. Whether a condition is a disability depends on the statutory test and the individual circumstances; a diagnosis alone does not determine the extent of support needed.

The effect of an impairment is generally assessed without the benefit of treatment or measures that control it, subject to statutory exceptions such as ordinary spectacles or contact lenses. A pupil whose condition is well controlled may therefore still be disabled.

2.2.3 Effects of the Impairment

The College will assess the individual effects of an impairment rather than apply a fixed threshold based on grades, diagnosis or a particular difficulty.

- ‘Normal activities’ are those which arise day-to-day in the home or school environment. They are undertaken by a large number of people – although not necessarily a majority – and carried out on a daily or frequent basis.
- ‘Substantial’ means more than minor or trivial; a pupil does not have to demonstrate that an activity is impossible or takes significantly longer.
- ‘Long-term’ means that the effect has lasted, or is likely to last, at least twelve months, or is likely to last for the rest of the person’s life. Effects which fluctuate or are likely to recur must also be considered.

For pupils with dyslexia or other learning differences, assessment should consider the combined effects on everyday learning and participation, including the effort required and any strategies used to manage difficulties.

- Relevant evidence may include difficulties with reading, writing, spelling, processing information or following instructions;
- Evidence should be considered in context, including the pupil’s age and any existing support.

Minor difficulties alone may not meet the statutory definition, but support may still be appropriate.

- No pupil will be ruled out of support solely because their attainment is strong or they have not obtained an educational psychologist's report.

2.3 Categories of people covered

This policy principally addresses pupils. The College also has separate Equality Act responsibilities as an employer and service provider; relevant staff and visitor arrangements are addressed through its employment, accessibility and associated policies.

- Prospective pupils (in relation to the College's Admissions arrangements)
- Pupils at the College (including times when absent or suspended)
- Former pupils, where conduct arises out of and is closely connected with their former relationship with the College;
- Parents, visitors and others using College services, under the applicable provisions of the Act.

3 Care of Pupils at Bradfield

3.1 Admissions

Admissions decisions will follow the Admissions Policy and Disability and Reasonable Adjustments Policy. Academic and co-curricular criteria must be applied lawfully, taking account of reasonable adjustments to the assessment process and avoiding unjustified disadvantage.

Applications will be welcomed from all families, irrespective of racial, national or ethnic origin, religious or political belief. Children from non-anglophone backgrounds or with individual parents who are disabled, gay or lesbian will be treated equitably as will the children of same sex couples.

Disabled applicants are welcomed. The College will consider the applicant's individual needs, reasonable adjustments to admissions assessments and the support needed to access education and boarding. Decisions must not rest on assumptions about a diagnosis or disability.

Reasonable adjustments will be provided without additional charge. If an adjustment is considered unreasonable, the decision, evidence and alternatives considered will be recorded. Relevant factors include its effectiveness, the College's resources, practicability, health and safety, and the impact on others. Cost alone will not automatically determine the outcome.

Parents and applicants may raise concerns about admissions or proposed adjustments with the Admissions Office. They will be informed of the applicable complaints route; the College Complaints Procedure will be used where its scope permits.

3.2 Induction

Parents are directed in the Prospectus and in the Final Entry Form to alert the College to a pupil's known special needs at the point of entry. On joining the College, all pupils will be offered a structured induction programme designed to assist them in bonding with their peers and feeling part of the College Community. Insofar as is reasonable, the programme will be modified or revised to accommodate any entrant identified with a disability *prima facie* likely to inhibit full participation in the induction arrangements.

The College will aim to involve all members of the pertinent year groups in induction programmes at the beginning of the academic year. These September programmes will be re-planned annually, taking account of what is known about the pupils involved, to ensure they are structured to accommodate as fully as is reasonable every pupil entering the year groups that September, including any pupils with identified disabilities that, *prima facie*, seem likely to inhibit their involvement with the general programme.

In Shell, Fifth Form and Upper Sixth years (as well as in the Faulkner's and Lower Sixth year groups outside September) induction will be centred on the particular individuals joining the College and organised by the Housemaster/mistress. The proper accommodation of individual difficulties or disabilities that appear *prima facie* significant will form part of the programme's planning.

Pupils with identified specific learning difficulties will be monitored by SSSD. Additionally, Housemasters/mistresses and tutors will supervise their early weeks to ensure they are sufficiently supported and their needs recognised and understood by those who teach them. Pupils with a disability that, *prima facie*, compromises full participation will be supported to facilitate their full College life.

The Pastoral Office, SSSD and House teams will use information gathered at entry and during the pupil's education to identify support needs. Screening for dyslexia is non-diagnostic. Pupil Support Plans (PSPs), SEN support plans and medical care plans will be used as appropriate, with clear actions, responsible staff and review arrangements. Staff should raise emerging needs promptly rather than wait for an annual audit.

Tutors will know the information and actions relevant to their role in each pupil's support plan and work with the Housemaster or Housemistress (HsM) to review progress and difficulties. All pupils will have opportunities for private one-to-one meetings with their tutor.

All involved in each pupil's education, both curricular and co-curricular, will offer support, tuition and guidance irrespective of an individual's gender, race, religion, disability, family circumstance, sexual orientation, linguistic background or academic or sporting ability.

Support will reflect the pupil's individual needs and relevant plans. Reasonable adjustments may include accessible teaching materials, changes to teaching or assessment arrangements, relocation of lessons or assistance with movement around the site. The College will anticipate barriers rather than wait for a pupil to experience disadvantage.

Pregnant pupils will be supported to attend antenatal appointments and access appropriate healthcare and education, as set out in the pregnancy and maternity section below.

3.3 Pastoral Care

The College will support every pupil's sense of belonging and access to education, irrespective of protected characteristics or wider background and needs. HsMs will coordinate pastoral support with SSSD, the Medical Centre and the DSL as appropriate. Where a pupil has an Education, Health and Care (EHC) plan, SSSD will coordinate the College's contribution to review and implementation with the local authority and relevant colleagues.

The Anti-Bullying Policy addresses prejudice-based and discriminatory bullying, including online incidents. Staff will use the reporting and recording arrangements set out in that policy and the Safeguarding and Child Protection Policy. Pupils will be taught how to seek help, and staff will consider the impact on the pupil as well as the behaviour itself.

Dress, dietary and religious observance arrangements will take account of pupils' needs, subject to lawful, proportionate requirements for safety and the effective running of the College. Support for pupils questioning their gender is addressed below.

3.4 Accommodation of Boarders

In Bradfield's boarding houses, pupils will be accommodated in rooms, often en-suite, that are intended to reflect the best standards of accommodation in the boarding sector of secondary education. Recently built houses, like Faulkner's and The Close contain lifts to allow disabled access to upper floors: many other houses offer ground floor rooms and disabled bathroom facilities to assist in the accommodation of the physically disabled. There is a College Accessibility Plan.

Certain houses are better located for pupils with limited mobility and/or more easily modified; physically disabled pupils will be offered accommodation in houses best located and most suited to meet their particular needs. Where a pupil requires a lift to give access to upper storeys the pupil will be accommodated in one of the houses fitted with an elevator. Appropriate reasonable adjustments to accommodation will be made to facilitate access to boarding accommodation for a physically disabled pupil covered by the Equality Act (2010); such adjustments will be recorded in an individual's Personal Support Plan.

The Accessibility Plan will address access to the curriculum, improvements to the physical environment and provision of information in accessible formats. The pupil reasonable-adjustment duty and the statutory accessibility-planning duty are distinct; the College will review both and record priorities, responsibilities and timescales.

Accommodation may be organised by year group, with individual age, maturity, welfare and support needs taken into account. Decisions will be fair, explained where appropriate, and reviewed when circumstances change.

Similarly, there will be no discrimination in respect of accommodation on the basis of pupils' race, ethnicity, religion, linguistic background, sporting/academic ability, family circumstances or sexual orientation. Every effort will be made to accommodate a physically disabled pupil alongside others in the year group; where, for practical reasons, the disabled pupil's accommodation has to be located in one area of the House, some other members of the year group will, if practicable, be accommodated in the same area.

Access to common facilities within houses (e.g. brewers, libraries, computer rooms) will be available to all pupils. There are, in some houses (but not all), common rooms set aside for the Upper Sixth (or the Sixth Form) and brewer use may be separated by year group.

Pupils will have equitable access to common facilities across houses and year groups. Reasonable adjustments and accessibility planning will address barriers for disabled pupils. Staff will challenge exclusion, hostility and harassment connected with a pupil's background, needs or protected characteristics.

3.5 Catering

At Bradfield a wide menu choice is available at mealtimes and reasonable provision will be made for special dietary, medical or religious needs. An individual's Care Plan will specify arrangements to meet particular dietary requirements. The Catering Committee meets regularly and will involve representatives from each house community. Its discussions inform the construction of the menus on offer from the College caterers and house representatives can bring the requirements of particular groups to the committee's attention. Membership of the Catering Committee will be open to all pupils at the College.

In the boarding houses, pupils observing Ramadan and similar festivals requiring special meal arrangements will be helped and supported by the Matron and HsM.

3.6 Health Care

The Medical Centre will maintain relevant medical records and coordinate individual care plans where required. Access to medical information will be restricted according to role and need.

In the Medical Centre, so far as possible, the school will enable pupils to see either a male, or a female doctor as the pupil chooses. Objective, confidential advice will be available to pupils on matters of sexual health, including safe sex practices, contraception and pregnancy. The Medical Centre team will be supported by a team of College Counsellors.

3.7 Wellbeing (Personal, Social and Health Education)

The arrangements in place will allow the sharing and discussion of views across the wholepupil spectrum and permit specific individuals and minority groups to share thoughts and concerns in a secure context.

Wellbeing teaching will be accurate, age appropriate and inclusive, reflecting the College's ethos while encouraging respect for people with protected characteristics. Teaching will distinguish facts and the law from contested views, respect lawful differences of belief, and meet the requirements for political impartiality.

The programme will help pupils make informed decisions about health and relationships, recognise prejudice and harmful behaviour, and seek support. Teaching will take account of SEND and language needs and will avoid assumptions about an individual's beliefs, family, sex or sexual orientation.

The planned curriculum will explicitly develop understanding of and respect for protected characteristics, in accordance with the Independent School Standards. This includes all nine characteristics at an age-appropriate level, although age and marriage and civil partnership are not covered by the school pupil discrimination provisions.

Because a good deal of work to promote sound personal development and good health in pupils is done in an informal way within the boarding house communities, all house tutor teams will be appropriately balanced, allowing pupils to choose to discuss sensitive issues with a range of different characters as they may prefer.

RSE will be delivered with regard to the statutory guidance in force from September 2026. Health education in this independent school is provided through PSHE under the Independent School Standards. The RSHE Policy sets out curriculum content, consultation and withdrawal arrangements.

Teaching about sex and gender reassignment will explain the law accurately, avoid reinforcing stereotypes and distinguish contested ideas from established facts. Same-sex relationships will be included appropriately when teaching about healthy relationships.

3.8 Pupil Consultation

Pupil views will be sought regularly through a range of accessible routes. Staff will make deliberate efforts to hear from pupils who are less likely to participate, including those experiencing barriers or discrimination. Pupil feedback will inform action and pupils will receive feedback where appropriate.

Pupil committees and leadership opportunities will be accessible and selection will use fair, relevant criteria. Reasonable adjustments will be considered, and staff will review whether any groups face avoidable barriers to participation.

3.9 Pupils' access to family support

All pupils will be supported so they can maintain private contact with their parents and families. Although the majority of pupils possess a mobile phone and use this to maintain home contact, in circumstances where this might be difficult for a pupil, the Housemaster/mistress (or Matron) will make a private land line available to a boarder for use. All pupils will have access to the email contact with family and friends.

3.10 Training of Staff

All staff will receive induction and appropriate updates on equality, inclusion, reasonable adjustments, challenging prejudice and reporting concerns. Training will be relevant to their role, including for non-teaching staff. Differences in routine or support must have a legitimate basis and take account of individual needs.

House tutor team meetings will help staff understand individual support needs and implement agreed adjustments. Training will include the distinction between SEND and disability, confidentiality, and how to respond to discriminatory behaviour.

3.11 Examinations

SSSD and the Examinations Office will identify and apply for access arrangements in good time, using the current requirements of the relevant awarding body, including JCQ where applicable. Arrangements for internal assessment will reflect individual needs and help establish the pupil's normal way of working. No particular arrangement is automatic solely because of a diagnosis.

- Disability access arrangements to exam environments
- Exam access arrangements may include extra time, supervised rest breaks, appropriate seating, a word processor or assistive technology where the relevant criteria are met. Software functions such as spellcheck are permitted only where the assessment rules allow them.
- EAL needs will be considered individually, including any permitted arrangements under the relevant awarding body's rules; EAL is not itself a disability.

4 Equality Procedures

4.1 Identification

Support needs may become apparent at admission, through a disclosure, staff observation, assessment or the pupil's own account. Everyone has protected characteristics; the College does not require pupils to declare an identity in order to receive fair treatment.

- Staff will identify barriers to participation and requests for support;
- Disability will be considered using the statutory definition above, including substantial and long-term effects on normal day-to-day activities.

4.1.1 Admissions Declaration

The Final Entry Form seeks information needed to assess and meet a pupil's learning, medical, pastoral and boarding needs. Parents are asked to provide relevant, accurate information and updates, with the purpose and handling of that information explained.

Learning information will be referred to SSSD and relevant boarding information to the House team. A disclosed need will be assessed individually and will not automatically bar admission. Any concern about incomplete information will be considered fairly under the admissions terms, taking account of equality obligations and the pupil's welfare, rather than treated as an automatic reason to withdraw a place.

Relevant medical information should be provided confidentially to the Medical Centre. Information needed to support a pupil safely may be shared with appropriate staff on a lawful, proportionate basis. The College will not promise that medical information can never be shared beyond the Medical Centre.

4.1.2 Disclosures

Pupils and parents may discuss support needs with the HsM, SSSD, Medical Centre, DSL or senior pastoral staff. Sensitive information will be handled in accordance with the Confidentiality Policy, privacy notices and data protection law. Staff will share only information necessary for the recipient's role and identify the lawful basis and any additional condition required for special category data.

Disclosures and decisions will be recorded accurately and stored or transferred using approved secure systems. Access will be restricted to those who need the information. Staff will explain the purpose of sharing where appropriate and record significant decisions to share or withhold information.

Pupils' views, age, understanding and confidentiality rights will be respected. Gillick competence is relevant to under-16s' consent to medical treatment; the Fraser guidelines concern contraceptive advice and treatment and are not a general information-sharing rule. A pupil aged 18 normally controls disclosure of their confidential medical information, including to parents. Necessary safeguarding or other lawful disclosures may still be made. Consent is not a prerequisite for necessary safeguarding sharing; the DSL will apply current information-sharing guidance and duties.

4.1.3 Identifying emerging needs

Medical staff will handle clinical findings under their professional confidentiality obligations. Necessary information about support or safety may be shared lawfully and proportionately; full clinical records will not routinely be circulated.

Staff who observe difficulties should record factual observations and speak to the HsM and relevant specialist team. They must report safeguarding concerns directly to the DSL without waiting for a diagnosis or parental meeting. Discussions with pupils and parents will be planned sensitively, taking account of confidentiality and any risk created by disclosure.

4.2 Working with Pastoral Management

HsMs will receive the information needed to support pupils safely and implement agreed arrangements. They will not automatically receive every detail about a pupil's protected characteristics or clinical history. Adjustments will be discussed with relevant staff and, as appropriate, the pupil and parents, with responsibilities and review dates recorded.

5 Intervention

Support and intervention will be recorded proportionately. Bullying and harassment will be challenged and addressed through the College's reporting procedures, with support for affected pupils and follow-up to check that the behaviour has stopped.

5.1 Medical Care Plans

Where a medical condition requires an individual care plan, the Medical Centre will develop and review it using appropriate clinical advice and consultation with the pupil and, where appropriate, parents. The plan will identify practical support, relevant risks, emergency arrangements and review requirements.

Relevant care instructions will be shared with the HsM, Matron and other staff who need them. Staff will receive sufficient information to act safely without unnecessary disclosure of diagnoses, consultation details or test results.

5.2 Special Educational Needs Register

On identification of a special educational need, a pupil will be placed on the College's Special Educational Needs Register (held on ISAMS) and recorded.

5.3 Pupil Support Plans (PSPs)

PSPs will be held on the Pastoral Dashboard and managed by the Pastoral Office. Staff will have access to the information and actions relevant to their role, with sensitive detail restricted appropriately. Staff leading trips or activities will receive the support and risk information needed for safe participation. Plans should identify actions, responsible staff and review arrangements.

5.4 Bullying and Sanctions Registers

HsMs and staff must record bullying and discriminatory incidents using the current Anti-Bullying Policy and incident reporting form. The record should capture the pupil's account and feelings, any discriminatory element, action taken, support and follow-up. The incident form will be referred to the Deputy Head Pastoral and/or DSL in accordance with the nature of the incident.

The Deputy Head Pastoral will oversee the College's bullying records and coordinate review with the DSL where safeguarding concerns arise. Concerns suggesting child-on-child abuse must be reported promptly to the DSL and must not wait for a sanction decision. Individual records will be linked where needed to avoid gaps between pastoral and safeguarding responses.

Prejudice-based incidents must be identified and considered even where there is only one reported incident or the behaviour does not yet meet the definition of bullying. Repeated or serious incidents and emerging patterns will receive senior pastoral and safeguarding review as appropriate.

Records of bullying, harassment and violence will be kept securely and retained under the College's records retention arrangements. Reporting in good faith must not result in victimisation.

6 Specific Anti-discrimination measures and the promotion of Equality

To work alongside the reactive measures described in section 5 and others set out in the Behaviour Policy and Anti-Bullying Policy, proactive measures will be put in place at Bradfield to promote equality of opportunity and to combat possibilities of discrimination against individuals with protected characteristics.

6.1 Disability

The College will promote understanding of disability, including non-visible disabilities and neurodiversity, and challenge stereotypes about ability and attainment.

All staff will challenge derogatory language and behaviour concerning disability. Describing conduct as a joke or 'banter' does not excuse it. Responses will be proportionate, support affected pupils and reinforce the College's expectations of kindness and inclusion.

Disabled pupils are entitled to respect and reasonable adjustments. Behaviour or sanctions concerning a disabled pupil must take account of disability-related needs and the College's equality duties; this does not prevent proportionate action to protect others.

6.2 Race

The College's international and multicultural community provides opportunities to learn from different experiences. Shared boarding, sporting and cultural activities do not by themselves prevent racism; staff will actively identify and challenge prejudice, including stereotypes and discriminatory language.

School assemblies and House Calls, from time to time, will specifically address the value of racial diversity and highlight the insidious impact of racism. In the curriculum, discussions in History, Religious Studies, Geography and the Sciences will aim to develop intelligent reflection on racial diversity, whilst in Wellbeing the discussion of racial diversity, racism and social pluralism will form a significant part of the programme.

Racist incidents will be challenged, recorded and referred under the Anti-Bullying and Behaviour policies, with DSL involvement where safeguarding concerns arise. Responses will address the impact on affected pupils and any wider pattern.

6.3 Sex

Bradfield College is committed to building a school community where equality of treatment and opportunity for boys and girls is the norm.

The co-educational ethos will support equitable access to teaching, leadership, activities and resources for boys and girls. Staff will challenge stereotypes and review any arrangements that may disadvantage either sex.

School Assemblies, House Calls and the Lecture Programme from time to time will specifically promote equality in the perception of male and female roles in the outside world, introducing pupils to women enjoying significant success within the workplace that equals or exceeds male colleagues. In Wellbeing classes, the discussions of gender stereotyping and male/female equality will form a significant part of the programme.

Sexist behaviour, sexual harassment, sexual violence and the sharing of sexual images will be addressed under the relevant safeguarding, behaviour and anti-bullying procedures. Staff will consider protection and support needs before deciding any disciplinary response.

6.4 Religion or Belief

Although an Anglican foundation, College publications will make it plain that Bradfield is open to people of all religious beliefs (and none) and that the Chapel is not a place where the young are proselytised. The College Whitelist will identify days in the Calendar which are festivals in different faith traditions and often the Chapel talk on a specific day will focus on the named festival and traditions or tales linked to it.

Pupils of different religions and beliefs, including pupils with no religion, will be treated with respect. The College will support understanding of different traditions and freedom to express lawful beliefs while challenging discrimination, intimidation and harassment.

Pupils will be supported to practise their religion, including through appropriate prayer arrangements, religious dress, dietary provision and support during Ramadan. Requests for absence for religious observance will be considered under the Attendance Policy, with individual arrangements discussed where necessary.

Incidents involving religious prejudice or hostility will be recorded and addressed through the Behaviour and Anti-Bullying policies, with safeguarding referral where appropriate. This includes antisemitism and anti-Muslim prejudice.

6.5 Sexual Orientation

Lesbian, gay and bisexual pupils are entitled to equal treatment and respect. Staff will challenge homophobic language and behaviour, including online incidents, and support pupils to seek help. Teaching and pastoral care will avoid assumptions about a pupil's sexual orientation or family.

Pupils who disclose their sexual orientation will be listened to sensitively. Staff will respect confidentiality and explain its limits; disclosure to parents or others will not be automatic. Boarding decisions will be based on individual welfare, privacy and risk considerations rather than stereotypes about sexual orientation.

Homophobic bullying or harassment will be recorded and referred under the College's Behaviour and Anti-Bullying policies, with DSL involvement where appropriate.

6.6 Pregnancy and maternity

A pupil will not be treated unfavourably because of pregnancy, childbirth or breastfeeding. Education, welfare and healthcare support will not be made conditional on compliance with rules about sexual

activity. Any separate concern about behaviour, consent, exploitation or abuse will be considered on its own facts through the appropriate procedures.

The College will agree an individual plan for continued education, healthcare appointments, pregnancy-related absence and return to learning. Appropriate practical arrangements will be considered, including access to facilities and adaptations to activities. Medical advice, the pupil's wishes and safeguarding considerations will inform planning.

6.7 Pupils who are parents

Parenthood is no automatic bar to education or boarding. Any decision about boarding or day attendance will follow an individual assessment of welfare, accommodation, safeguarding and practical needs, with reasons and alternatives recorded. This does not create an entitlement to accommodate a baby in a boarding house. The College will discuss how education and family responsibilities can be supported.

6.8 Gender reassignment and pupils questioning their gender

The College will treat transgender and gender-questioning pupils respectfully and challenge transphobic bullying. Gender reassignment protection does not require medical treatment. Sex under the Equality Act means biological sex; gender reassignment is a separate protection.

Requests for social transition will be considered carefully through the DSL and senior pastoral team under KCSIE 2026, paragraphs 254–284. Staff must not initiate or independently agree changes. Parents will normally be involved promptly; the DSL must first assess any greater risk from involving them. Simply confiding feelings, without requesting changes, does not itself justify breaking confidence. Decisions will consider the child's and peers' welfare, relevant advice and equality duties, and will be recorded and reviewed. Names, pronouns and dress requests will follow this process. Pupils must not access toilets, changing rooms or boarding accommodation designated for the opposite biological sex, or opposite-sex sport where separation is necessary for safety. Suitable private alternatives will be considered. Under-18s must not share overnight accommodation with the opposite sex, including on trips. Biological sex records must remain accurate.

7 Other Areas

Pupils and parents may raise equality concerns with an HsM, the EDI Lead or a senior member of staff and use the College's Complaints Procedure where applicable. Pupils will be supported to report concerns in an accessible way, without fear of retaliation. Concerns about adults will follow the Managing Allegations and Low-Level Concerns procedures; whistleblowing arrangements are available in the Staff Handbook.

Staff will consider whether discrimination or exclusion increases a pupil's vulnerability and whether additional support is needed. They should not assume that a pupil is vulnerable solely because of a characteristic, or overlook abuse because it appears connected with a disability or learning need.

Pupils will be encouraged to sit as members of the EDI Committee. This Committee has responsibility for reviewing the current EDI reality of the College and suggesting ways to develop diversity and inclusion further. It aims to promote, champion and encourage diversity, inclusion and equality across the whole College community, making recommendations on initiatives and activities for progressive, yet long lasting change. The Assistant Head Safeguarding who is also the College's EDI Lead, chairs this group.

Council retains oversight of compliance. The EDI Lead will review patterns in incidents and complaints, pupil feedback, participation and the implementation of adjustments with relevant colleagues. Findings will inform priorities, staff development and policy review; monitoring will avoid unnecessary collection or disclosure of sensitive personal information.

Summary of changes and additions – notes to inform review – not included in policy

Legal scope. Separated the seven protected characteristics in the school pupil provisions from all nine characteristics in the Act and from the wider boarding inclusion requirements. Clarified the independent-school position on the Public Sector Equality Duty.

Disability and access. Corrected the threshold for disability and long-term effects. Removed categorical exclusions for pupils with dyslexia. Strengthened individual assessment, admissions adjustments and accessibility planning.

Confidentiality. Removed promises of absolute medical confidentiality and automatic sharing with HsMs. Clarified secure, proportionate sharing, adult pupils' confidentiality and the limited scope of Gillick and Fraser principles.

Pregnancy and parenthood. Removed the condition tying support to compliance with sexual-activity rules and the blanket presumption of day attendance for pupil mothers. Replaced these with individual planning.

Gender and boarding. Replaced outdated clinical terminology and automatic arrangements with a cross-reference to the final KCSIE 2026 decision process. Clarified biological sex, separate gender reassignment protection and accommodation requirements.

Reporting and oversight. Replaced duplicated register descriptions with a consistent reference to the incident form, Deputy Head Pastoral and DSL. Added pupil impact, follow-up, annual monitoring and Council oversight.

Before approval

With RJP - Confirm the incident form routing, record ownership and governor reporting arrangements against the final Anti-Bullying, Behaviour policies.

With AAL - Check the Accessibility Plan and arrangements for accessible boarding, individual toilets and changing facilities against actual provision.

SRD to share with - SSSD, the Medical Centre, Admissions and the data protection lead to confirm their operational responsibilities and related forms. Confirm any employment-policy cross-references with HR.