

1. INTRODUCTION

- 1.1 Equality of opportunity will only exist when we recognise and value differences and work together for inclusion. Indie Education is committed to cultivating an inclusive environment that:
- (a) Respects individuality
 - (b) Responds to individual needs
 - (c) Celebrates differences and empowers individuals to share experiences and ideas
 - (d) Identifies and removes barriers
 - (e) Provides equal opportunities
 - (f) Ensures everyone feels represented, included, and valued
- 1.2 The diversity within our college communities is one of our greatest assets. We have a moral and statutory duty to respond to this diversity, ensuring our policies, procedures, and day-to-day educational delivery reflect this commitment.

2. DEFINITIONS

- 2.1 **Equality** – Equal access to opportunity and respect, ensuring no one is treated differently due to their characteristics.
- 2.2 **Diversity** – Recognising and valuing differences, respecting everyone for who they are.
- 2.3 **Inclusion** – Ensuring a sense of belonging, respect, and value for every individual.

3. LEGAL CONTEXT

- 3.1 Under the Equality Act 2010, we recognise nine protected characteristics: age, disability, gender reassignment, race, religion or belief, marriage and civil partnership, sexual orientation, pregnancy and maternity, and sex. Additionally, we address social disadvantage to tackle inequalities from learners' backgrounds or family circumstances.

4. EQUALITY CONSULTATIVE GROUP (ECG)

- 4.1 To support and monitor the implementation of our strategy, we will establish an ECG with representation from across our community, this group will champion the voices of protected groups and promote awareness around equality issues.

5. UNDERSTANDING OUR COMMUNITIES

- 5.1 Knowing our staff and wider Indie Education community demographics is crucial for informed decision-making. We aim to gather a breakdown of learner, staff, and governance characteristics by the end of 2026 as a priority objective, as we create our Indie Education community workforce.

6. EMPLOYMENT PRACTICES

- 6.1 Indie Education is committed to creating an inclusive workplace by reducing barriers and providing opportunities for all, particularly under-represented groups. Our recruitment processes are designed to attract a diverse pool of talent and eliminate unjustified discrimination.

7. RECRUITMENT AND SELECTION

- 7.1 We promote an inclusive environment through:
- (a) Collection and analysis of diversity data
 - (b) Positive action statements in job adverts
 - (c) Implementing 'blind recruitment' to mitigate unconscious bias

8. PAY PROGRESSION

- 8.1 All pay decisions are based on objective data to avoid discrimination. Indie Education Board reviews pay progression data and publishes a Gender Pay Gap report annually.

9. REASONABLE ADJUSTMENTS

- 9.1 Recognising that equality doesn't mean treating everyone the same, we provide necessary adjustments to support employees with different needs.

10. TRAINING & DEVELOPMENT

- 10.1 Mandatory equality and diversity training is required for all employees, with additional training available for fair recruitment and selection.

11. ASSESSING EQUALITY IMPLICATIONS

- 11.1 Significant decisions and policy developments must consider equality implications. An Equality Impact Assessment (EqIA) (Appendix B) form provides a framework for this analysis to take place as we evolve.

12. GATHERING AND ANALYSING EQUALITY DATA

- 12.1 Equality objectives will be based on data analysis related to demographic data, admissions, attendance, attainment, exclusions, prejudice-related incidents, and SEND provision.

13. EMBEDDING EQUALITY AND DIVERSITY IN THE CURRICULUM

- 13.1 Our curriculum reflects the diversity of modern society, ensuring all learners feel welcome. We provide professional development to support teachers in this endeavour.

14. LEARNER PROVISION

- 14.1 We ensure appropriate support for learners under the Act, extending the duty to provide auxiliary aids and services to SEN, neuro-diverse and disabled learners.

15. OUR COLLEGE RESPONSIBILITIES

- 15.1 All sites across Indie Education will publish information demonstrating compliance with the equality duty and set specific, measurable equality objectives, reviewed annually.

16. EQUALITY OBJECTIVES 2025–2026

- (a) **Data Gathering:** Understand diversity demographics and address inequalities by the end of 2025.2026.
- (b) **Inclusive Curriculum:** Train staff to provide an inclusive curriculum by the end of 2025.2026.
- (c) **Diverse Workforce:** Implement 'blind recruitment' to reflect our diverse community by September 2026.
- (d) **Equality Group:** Establish an equality group by September 2026.
- (e) **Reporting Template:** Develop a template for compliance reporting, launched in Spring 2026
- (f) **Flexible Working:** Support flexible working opportunities, with the project ending in December 2025.

17. MONITORING AND REVIEW

- 17.1 The strategy and objectives are monitored by the Board of Trustees, with an annual progress report provided.
- 17.2 The CEO will review this strategy annually with the DCEO.

18. AUTHORISATION

- 18.1 This document has been authorised by the Chief Executive Officer.

APPENDIX A: WHAT THE LAW SAYS ABOUT EQUALITY

1. EQUALITY LAW

- 1.1 There are a number of equality based national laws and guidelines which mandate and guide how we should demonstrate equality.
- 1.2 Some of these principle equality drivers are identified in the table below:

Legislation	Requirements
<i>The Equality Act 2010</i>	Protection from discrimination on the basis of nine protected characteristics, including: • Age (duty as employer, not in relation to pupils) • Sex • Ethnicity • Religion or Belief • Disability • Sexual Orientation • Gender Re-assignment • Pregnancy & Maternity • Marriage & Civil Partnership
<i>General Equality Duty</i>	• To eliminate unlawful discrimination, harassment and victimisation. • Advance equality of opportunity • Foster good relations
<i>Public Sector Equality Duty</i>	• To publish relevant, information demonstrating compliance with the Equality Duty • To analyse effect of policies and practices on equality. • Set specific, measurable Equality Objectives.

2. COMPLIANCE

- 2.1 As a public body, the trust must comply with the *Equality Act 2010* which gives protection to individuals and groups identifying with the nine protected characteristics within the act.
- 2.2 The *Public Sector Equality Duty* supports good decision making by the trust, requiring us to consider how different people will be affected by our functions, policies and services.
- 2.3 This duty means we must aim to remove or minimise any disadvantage that people may experience due to their protected characteristics, which includes taking action where their needs may differ from those of others and encouraging them to take a greater part in public life and activities where this is disproportionately low.
- 2.4 *The Equality Act* provisions not only cover who and how we provide education to but also our staff. We have responsibilities as an employer to ensure that people with protected characteristics are not discriminated against when seeking employment with us, while working for us or when taking part in work-related activities.

APPENDIX B – TYPES OF UNLAWFUL BEHAVIOUR

1. UNLAWFUL BEHAVIOUR

2.5 The Equalities Act 2010 defines four kinds of unlawful behaviour – direct discrimination; indirect discrimination; harassment and victimisation.

2.6 *Direct Discrimination*

2.6.1 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 an employee was refused a promotion because of their race.

2.7 *Indirect Discrimination*

2.7.1 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.

2.7.2 An acceptable defence against a claim of indirect discrimination is if it can be shown that an action was “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.

2.8 *Harassment*

2.8.1 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.

2.8.2 Where schools or colleges are concerned, the offence of harassment as defined in this way in the Act applies only to harassment because of disability, race, sex or pregnancy and maternity, and not to religion or belief, sexual orientation or gender reassignment. It is very important to recognise that this does not mean that schools are free to bully or harass pupils on these other grounds - to do so would still be unlawful as well as unacceptable. Any case against the school would be on grounds of direct discrimination rather than harassment.

2.9 *Victimisation*

2.9.1 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.

2.9.2 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.

- 2.9.3 As well as it being unlawful to victimise a person who does a protected act, a child must not be victimised because of something done by their parent or a sibling in relation to the Act. This means that a child must not be made to suffer in any way because, for example, her mother has made a complaint of sex discrimination against the school, or her brother has claimed that a teacher is bullying him because he is gay, whether or not the mother or brother was acting in good faith.
- 2.9.4 If a pupil has himself or herself done a protected act – such as making a complaint of discrimination against a teacher – then the child's own good faith will be relevant. For example, if the parent's complaint is based on information from her son and the son was deliberately lying, it is not victimisation for the school to punish him in the same way as it might do any other dishonest pupil. Unless it can be clear that the mother was also acting in bad faith (for example that she knew her son was lying) it would still be unlawful to victimise her for pursuing the complaint.

APPENDIX C - EQUALITY IMPACT ASSESSMENT (EIA)

1. EQUALITY IMPACT ASSESSMENT FORM

- 1.1 Indie Education will use this proforma as we build our staffing workforce and revise policy and practice across our communities of learners and colleagues.

2. INSTRUCTIONS

- 2.1 **Fill in the relevant sections:** Use headings to guide our assessment. Each section tailored to reflect the specific policy or practice we assess.
- 2.2 **Consult stakeholders:** Involve key individuals who can provide insight into how policy affects different groups.
- 2.3 **Evaluate impacts:** Identify both positive and negative impacts and consider how we can enhance the former and mitigate the latter.
- 2.4 **Document actions:** Clearly outline the steps you will take to address any identified issues and how you will track the effectiveness of these actions.

Section 1: Introduction
Policy/Practice Title:
Date of Assessment:
Assessor(s) Name(s):
Department/Team:
Section 2: Purpose and Aims
What is the main aim of the policy/practice?
Who will benefit from this policy/practice?
What are the intended outcomes?

Section 3: Scope and Relevance

Who is affected by this policy/practice?

Is the policy/practice relevant to the Equality Act 2010?

Section 4: Evidence and Consultation

What evidence has been used to assess the impact of the policy/practice?

- Data sources (e.g., pupil demographics, staff surveys)

Who has been consulted in the development of this policy/practice?

- Internal stakeholders (e.g., staff, pupils)
- External stakeholders (e.g., parents, community groups)

Section 5: Impact Assessment

Positive Impacts:

- How does the policy/practice promote equality and diversity?

Negative Impacts:

- Are there any potential adverse effects on different groups?
- If yes, which groups are affected (e.g., age, disability, gender, race)?

Section 6: Mitigation and Actions

What actions will be taken to mitigate any negative impacts?

How will these actions be monitored and evaluated?

Section 7: Conclusion**Summary of Findings:**

- Does the assessment indicate a positive, neutral, or negative impact on equality?

Next Steps:

- Recommendations for policy/practice improvement

Section 8: Sign-off

Assessor(s) Signature:

Date Signed:

Approval by Senior Leader:

Date Approved: