



Equality, Diversity and Inclusion (EDI) Policy

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Part 1: Equality, Diversity and Inclusion Policy for Pupils

1. Introduction

Bute House Preparatory School (The School) welcomes girls from all ethnic backgrounds, nationalities and religions, and is committed to embracing and celebrating diversity and promoting a whole school culture of equality, safety and protection.

The School is committed to a zero-tolerance approach with regard to discriminatory behaviour towards pupils or between pupils.

2. Aims

The School is committed to:

- communicating its commitment to the promotion of equal opportunities
- promoting equal treatment within the School for all members of the School community
- creating and maintaining an open and supportive environment which is free from discrimination, harassment and victimisation
- fostering mutual tolerance and positive behaviours, practices and attitudes so that all pupils feel valued within the School
- providing an environment of equality and inclusivity in which diversity is celebrated and seen as a strength
- striving for equality across all learning environments by implementing culturally responsive practices, challenging biases, and differentiating to meet pupil needs
- continually developing the curriculum to be representative of the current pupil base and community
- preparing pupils to engage in meaningful and well-informed conversations around equality, diversity and inclusion

3. The Legal Background

The Policy has been prepared to meet the School's responsibilities under the following:

- The Equality Act 2010
- Human Rights Act 1998
- The Education (Independent School Standards) Regulations 2014 (ISSR)
- EYFS statutory framework for group and school-based providers (DfE, November 2024)
- Education and Skills Act 2008
- Children Act 1989
- Childcare Act 2006
- Data Protection Act 2018

- UK General Data Protection Regulation (UK GDPR)
- Children and Families Act 2014

The following also offers useful guidance: Equality Act 2010: explanatory notes (2010); Technical guidance for schools in England (Equality and Human Rights Commission, July 2024); The Equality Act 2010 advice for schools (DfE, June 2018); Special educational needs and disability code of practice: 0 to 25 years (DfE, May 2015); Preventing hair discrimination in schools (Equality and Human Rights Commission, October 2022); Working together to safeguard children (DfE, December 2023, last updated February 2024); Keeping children safe in education (DfE, September 2024); and Relationships education, relationships and sex education (RSE) and health education guidance (DfE, September 2021).

Other Relevant School Documentation

- Equality, Diversity and Inclusion Policy for Staff (Appendix 1)
- Admissions Policy
- Positive Behaviour Policy
- Anti-Bullying Policy
- RSE Policy
- Learning Enrichment Policy
- Curriculum Policy
- Teaching and Learning Policy
- Various Subject Policies
- Disability Discrimination Policy
- 3 Year Accessibility Plan
- English as an Additional Language Policy

4. Responsibilities

The Governing body (as proprietor of the School) has overall responsibility for the Equality, Diversity and Inclusion Policy. The Head is responsible for its implementation and for delegating responsibilities and tasks to other staff, and will ensure that the Policy is accessible, available, known and understood by staff and pupils. The Head will ensure risk assessments are carried out and the effectiveness of actions taken is evaluated.

The Head is responsible for keeping the Policy up to date and compliant with the law and best practice. The Head must also present incident reports to the Governors.

The Deputy Head, leading the Academic Leadership Team, is responsible for ensuring equal opportunities in the curriculum.

All staff are responsible for following the Policy and reporting incidents of unequal treatment involving pupils to the appropriate senior member of staff.

The Head is responsible for seeking input from interested groups (such as pupils, staff and parents) to consider improvements to the School's processes under the Policy.

5. Policy Statement

The School recognises the benefits of having a diverse School community, with individuals who value one another, and the different contributions everyone can make. The School promotes an inclusive environment where 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.

In the provision of equal opportunities to pupils, the School recognises and accepts its responsibilities under law to oppose discrimination on the basis of the following protected characteristics (as may be applicable) and as set out in Chapter 1 Equality Act 2010 (Protected Characteristics): disability; gender reassignment; race; religion or belief (including lack of religion or belief); sex and sexual orientation.

In the provision of equal opportunities to adult members of the School community (except Staff to whom Part 2 applies), the School recognises and accepts its responsibilities under law to oppose discrimination on the basis of the following protected characteristics as set out in Chapter 1 Equality Act 2010 (Protected Characteristics): disability; gender reassignment; pregnancy and maternity; race; religion or belief (including lack of religion or belief); sex; sexual orientation; marital and civil partnership and age.

In addition, the School also opposes all bullying and unlawful discrimination on the basis that a person has a special educational need or learning difficulty, a different cultural or linguistic background or academic or sporting ability.

The School aims to ensure that all policies and practices conform with the principle of equal opportunities. The School will also tackle inappropriate attitudes, behaviours and practices through staff leading by example, through the PSHE, relationships education, relationships and sex education policy and programmes, through the supportive School culture and through the School's wider policies.

Please see Part 2 for the School's Equality, Diversity and Inclusion Policy for Staff.

6. Discrimination

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:

Direct Discrimination:

Direct discrimination occurs when a person is treated less favourably than others on the basis 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.

Indirect Discrimination:

Indirect discrimination may arise when 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.

Discrimination Arising from Disability:

Discrimination arising from disability includes situations where a disabled person is treated unfavourably due to 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.

7. Harassment

This Policy covers the following forms of harassment:

Harassment related to a protected characteristic:

Harassment may occur where someone is engaged in unwanted conduct related to a protected characteristic that has the purpose or effect of violating an individual'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.

Sexual Harassment:

Harassment may also occur where a person engages in unwanted conduct of a sexual nature that has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment for that person. It is also harassment

to treat someone less favourably because they have either rejected, or submitted to, sexual harassment.

The School unequivocally states its intolerance for harassment in any form. Further information relating to the following types of harassment can be found in the relevant School Policies below:

- Harassment relating to a protected characteristic by a pupil is likely to be contrary to the School's Anti-Bullying Policy
- Harassment relating to a protected characteristic by a member of staff is likely to be contrary to the School's Staff Behaviour Policy and Staff Handbook
- Sexual harassment relating to pupils and the School's response will be dealt with in the Safeguarding (Child Protection) Policy
- Sexual harassment relating to staff in the Staff Handbook

8. Victimisation

Victimisation may occur where a person is treated less favourably than otherwise may be the case, because of some action (referred to as a 'protected act') that they have taken, they may take or they are believed to have taken in connection with the Equality Act 2010. Protected acts are, broadly, any actions taken by a person in good faith in connection with the Equality Act 2010, such as making or supporting an allegation of discrimination or harassment.

It is also unlawful to victimise a child for anything done in relation to the Equality Act by their parent or sibling.

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

Dietary Requirements

The School takes all reasonable steps to meet the dietary needs of all pupils whilst at school or on a school trip in relation to the dietary customs of different faiths and any allergens. These are communicated to the School by parents via the annual data collection forms. Please refer to the Health and Safety Policy.

Pupils with English as an Additional Language (EAL)

The School recognises that a diversity of languages brings a richness to life at the School. Pupils with English as a second language are immediately integrated within the classroom and extra support is given as required. Prior to entry, parents complete a form indicating the languages spoken at home. Staff are thus alerted to any pupil who may need support and help with EAL. This is overseen by an EAL coordinator.

Any extra help is given by School staff within the school day. Please refer to the Policy for English as an Additional Language (EAL).

10. Identity

At Bute House every pupil should have opportunities to achieve the highest possible standards, and the best possible qualifications for the next stage of their life and education. Every pupil should be helped to develop a sense of personal and cultural identity that is confident and open to change, and that is receptive and respectful towards other identities. Every pupil should develop the knowledge, understanding and skills that they need in order to participate in Britain's multi-ethnic society, and in the wider context of an interdependent world. The School has high expectations of everyone involved with the School, and promotes mutual respect and to value others' similarities and differences, which encourages everyone in the School community to gain a positive self-image and high self-esteem.

11. Curriculum

The School's curriculum is a powerful tool by which the School aims to equip pupils with the knowledge and language surrounding the principles of equality, diversity and inclusion. This includes thorough yearly subject reviews and development plans completed by Heads of Department wherein the EDI principles are assessed and embedded diagonally across the curriculum. The primary aims of the curriculum include:

- Incorporating representations within the curriculum that reflect the identities of the School's pupils.
- Ensuring the publishers and authors of educational resources used represent diverse backgrounds and perspectives.
- Enabling the exploration of social issues (racism, identity, discrimination).
- Providing inclusive activities that are accessible to a range of needs, including co-curricular provision and trips.
- Continually reviewing educational materials to ensure that any possible bias and reinforcement of stereotypes are avoided.
- Normalising pupil differences and the ability to discuss differences.
- Differentiating materials and provision of instruction to address pupil needs, including special educational needs (SEN), EAL, social/emotional/behavioural needs.

12. Admissions

The School accepts applications from, and admits pupils irrespective of their gender reassignment, race, disability, sexual orientation, 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 and open-minded way.

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.

The School's Admissions Policy reflects the School's approach towards equal opportunities for prospective pupils and is consistent with this Policy.

13. Education and Associated Services

- (a) **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, religion or belief or special educational needs, subject to overriding considerations of safety and welfare.
- (b) **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.
- (c) **Exclusions:** The School will not discriminate against any pupils by excluding them from the School, or by subjecting them to any other detriment, on the grounds of their sex, gender reassignment, race, disability, sexual orientation, religion or belief, or special educational needs.
- (d) **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.
- (e) **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 special educational needs, subject to considerations of safety and welfare, and that 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.
- (f) **Bullying:** Bullying is always unacceptable and will not be dismissed as being normal or as "banter", "just having a laugh", or simply "part of growing up". The School will not tolerate bullying, including cyberbullying, prejudice-based bullying and discriminatory-based bullying, for any reason and adopts a zero-tolerance approach.

14. Uniform

The School acknowledges and respects the diversity of its pupil body, including variations in religious beliefs and physical abilities. The same school uniform guidelines apply equally to all pupils, irrespective of their gender reassignment, race, disability, sexual orientation, religion or belief or special educational needs, subject to considerations of safety and welfare. However, the School will consider requests for alterations to the School's uniform, for example, for genuine religious requirements and reasonable adjustments for disabled pupils. The School is committed to fostering an inclusive environment that accommodates the needs and expressions of all pupils.

Symbols of faith: certain hairstyles, items of jewellery (such as the Kara bangle worn by Sikhs), and items of headwear (such as head coverings) 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 uniform guidelines (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 pupils or their parents to the Head, whose decision will be final, subject to the Complaints Policy.

Disabled pupils: reasonable adjustments may be required to the School uniform for disabled pupils who require them. The pupils or their parents should refer the matter to the Head to ensure all reasonable adjustments are made.

15. Religious Belief

The School upholds the right and freedom of individuals to practice their religious beliefs or choose no faith. This freedom is subject to the condition that individuals respect the rights and freedoms of the School community as a whole, ensuring considerations of safety and welfare. The School encourages a culture of understanding and tolerance among pupils with diverse religious beliefs.

16. Disability and Special Educational Needs

The School is dedicated to providing an inclusive and supportive learning environment for pupils with disabilities and special educational needs. The School maintains and drives a positive culture towards inclusion of disabled people and those with special educational needs in all its activities and will not treat a member of its community less favourably on these grounds without justification. At present, its facilities, physical and otherwise, for the disabled and those with special educational needs are limited. However, the School will do all that is reasonable to ensure that the curriculum, ethos, culture, policies, procedures and premises are made accessible to everyone.

Reasonable adjustments: The School has an ongoing 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:

- the curriculum
- classroom organisation and timetabling
- access to School facilities
- clubs and visits
- School sports
- School policies

Reasonable adjustments may typically include:

- making arrangements for a pupil in a wheelchair to attend an interview in an accessible ground floor room
- allowing extra time for a dyslexic pupil to complete an entrance exam
- providing examination papers in larger print for a pupil with a visual impairment
- rearranging the timetable to allow a pupil to attend a class in an accessible part of the building
- arranging a variety of accessible sports activities

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.

As well as providing educational services, the School provides services to the public, for example at:

- open days
- parents' evenings
- concerts and plays
- exhibitions
- conferences
- use of sports facilities

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.

For reasonable adjustments for staff please see Part 2.

Informing the School: in accordance with the School's terms and conditions, parents of pupils must notify the Head 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 registration 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.

Admission of pupils with a disability or special educational need: applications for a place at the School will be considered on the basis that reasonable adjustments could be made by the School in order to cater for the pupil's disability or 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 its decision and give details of the reasonable adjustments or other arrangements it is going to make or give reasons why an offer of a place has not been made.

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 Head, 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.

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 Director of Finance and Operations (DFO).

Pupils with EHC Plans

For detailed information regarding the welfare and educational provision for pupils with Education, Health and Care (EHC) Plans, please refer to the School's Learning Enrichment Policy. The School is committed to ensuring that these pupils receive the necessary support to thrive academically and socially.

17. Staff Training

The School acknowledges the importance of continuous staff training to enhance awareness and understanding of diversity and inclusion issues. Regular training sessions will be provided to staff members to promote cultural competency, sensitivity to diverse needs, and effective communication with pupils from various backgrounds. The School maintains written records of all staff training.

18. Record Keeping

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.

The School will maintain accurate and confidential records related to equality, diversity, and inclusion initiatives. These records will assist in monitoring progress, identifying areas for improvement, and ensuring compliance with legal and ethical standards.

All reported breaches of this Policy will be recorded and this record will be reviewed annually by the DFO.

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 explains how the School will use personal data.

19. Risk Assessment

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. This is in line with Part 3 of the Education (Independent School Standards) Regulations 2014.

Regular risk assessments will also be conducted to identify and address potential barriers to equality, diversity and inclusion within the School environment. These assessments will inform proactive measures to create a safe and inclusive space for all pupils and staff.

20. Awareness and Observance of the Policy

The existing ethos in the School ensures awareness and observance of the Policy through talks, written guidance for staff, discussions and codes of behaviour.

The School welcomes its responsibilities and duties under the legislation as set out earlier in this Policy.

The School recognises and values cultural diversity and seeks to celebrate it.

The School recognises the positive role it must play in developing an understanding of the importance of racial harmony so that its pupils are well equipped to play their part in a multi-cultural society.

21. Monitoring and Review

The Governing Body will monitor and review biennially the working of the Policy and procedures.

Part 2: Equality, Diversity and Inclusion Policy for Staff

1. Introduction

School's position: The School supports the principle of equal opportunities and opposes discrimination on the basis of age, sex, marriage and civil partnership, gender reassignment, race, disability, sexual orientation, religion or belief, pregnancy and maternity and part-time or fixed-term employment (defined as Protected Characteristics). Being a committed equal opportunities employer, the School will take every possible step to ensure that employees are treated equally and fairly. All policies and practices will conform with the principle of equal opportunities in terms of recruitment, selection, training, promotion, career development, discipline, redundancy and dismissal.

2. Application of the Policy

Application: This Policy applies to the School's employees, whether permanent, temporary, casual, part-time or on fixed-term contracts, to ex-employees, to job applicants and to individuals such as agency staff, consultants, volunteers and Governors who are not its employees, but who work, volunteer or attend at the School (collectively workers).

Workers' duties: All workers have a duty to act in accordance with this Policy, to treat colleagues with dignity at all times, and not to discriminate against, harass or victimise other members of staff, whether junior or senior to them. In some situations, the School may be at risk of being held responsible for the acts of individual members of staff and will not tolerate any discriminatory practices or behaviour. The School will not tolerate discriminatory practices or behaviour at work. For the avoidance of doubt, this includes conduct near the workplace and at work-related social functions, as well as at the workplace or on work business.

3. Responsibilities

Management: Those working at a management level have a specific responsibility to set an appropriate standard of behaviour, to lead by example and to ensure that those they manage adhere to the Policy and promote the aims and objectives of the School with regard to equal opportunities. To facilitate this process, staff may be given training on equal opportunities awareness and equal opportunities recruitment and selection best practice.

Questions about this Policy: All members of staff are responsible for the success of this Policy and must ensure that they familiarise themselves with the Policy and act in accordance with its aims and objectives. If they are involved in management or recruitment, or if they have any questions about the content or application of this Policy, they should contact the Head.

4. Forms of discrimination

Types: Discrimination may be direct or indirect and it may occur intentionally or unintentionally.

Direct discrimination: Direct discrimination occurs where:

- someone is treated less favourably because of one or more protected characteristics. For example, rejecting an applicant because they would not "fit in" because of their race or sexual orientation would be direct discrimination;
- someone is less favourably treated because of their association with someone who has a protected characteristic. For example, an employee may be treated less favourably because they have a disabled child;
- someone is treated less favourably because they are perceived to have a protected characteristic. For example, an employee may be treated less favourably because they are believed to be (but may not actually be) homosexual.

Indirect discrimination: Indirect discrimination occurs where an individual is subject to a provision, criterion or practice, applied to a group of people, which puts them at a particular disadvantage because of a protected characteristic, and it cannot be objectively justified. An example might be a minimum height requirement for a job. This is likely to eliminate proportionately more women than men. If this criterion cannot be objectively justified, because it is not a proportionate means of achieving a legitimate aim, then it will be indirectly discriminatory on the ground of sex.

Victimisation and harassment: Discrimination also includes victimisation (suffering a detriment because of action the employee has taken or may take to assert legal rights against discrimination or to assist a colleague in that regard (called a **Protected Act**)) and harassment (see the School's Anti-Harassment Policy for a more detailed explanation of "harassment").

5. Recruitment and selection

School's position: The School aims to ensure that no job applicant receives less favourable treatment because of a protected characteristic. Recruitment procedures will be reviewed regularly to ensure that individuals are treated on the basis of their relevant merits and abilities and that sufficiently diverse sectors of the community are reached. Job selection criteria are reviewed from time to time to ensure that they are justifiable on non-discriminatory grounds as being essential for the effective performance of the job.

6. Staff training, promotion and conditions of service

The School's position: Staff training needs shall be identified through regular staff appraisals. All workers will be given an equal opportunity and access to training to enable them to progress within the organisation. All promotion decisions shall be made on the basis of merit.

Terms and conditions: The School's conditions of service, benefits and facilities will be reviewed from time to time to ensure that they are available to all workers who should have access to them and that there are no unlawful obstacles to accessing them.

7. Disability discrimination

Informing the School: If staff are disabled, or become disabled in the course of their employment, they are encouraged to tell the School about their condition. This is to enable the School to support them as much as possible and to ensure that they are not treated less favourably because of something related to their disability.

Reasonable adjustments: They may also wish to advise their Line Manager or the DFO of any reasonable adjustments to their working conditions or the duties of their job which they consider to be necessary, or which would assist them in the performance of their duties. This may involve the provision of an additional piece of equipment or assistance in helping them to perform their work. Their Line Manager or the DFO may wish to consult with them and with their medical adviser(s) about possible reasonable adjustments. Careful consideration will be given to any such proposals and they will be accommodated where possible and proportionate to the needs of their job. Nevertheless, there may be circumstances where it will not be reasonable for the School to accommodate the suggested adjustments and the School will ensure that it provides them with information as to the basis of the decision not to make any adjustments.

Physical features: The School will monitor the physical features of its premises to consider whether it can make any changes to help remove disadvantages which these may create for disabled users. Where possible and proportionate, the School will take steps to improve access for disabled.

8. Fixed-term employees

Monitoring: The School will monitor its use of fixed-term employees and their conditions of service, to ensure that they are being offered, where relevant, appropriate access to benefits, training, promotion and permanent employment opportunities.

9. Part-time employees

Monitoring: The School will monitor the conditions of service of part-time employees and their progression to ensure that they are being offered appropriate access to benefits and training and promotion opportunities. The School will also ensure requests to alter working hours are dealt with appropriately under the School's Flexible Working Policy.

10. Agency workers

Monitoring: The School will monitor agency workers to ensure that they are treated no less favourably than a comparable worker in relation to accessing collective facilities and amenities at the School. The School will also monitor the use of temporary work agencies and subject to the exceptions set out in the Agency Workers Regulations 2010 will ensure that all agency workers have the same basic working conditions they would have been entitled to had they been recruited by the School directly into a comparable role.

11. Breaches of the Policy

Complaints: If staff believe that they may have been disadvantaged because of a protected characteristic, they are encouraged to raise the matter through the School's grievance procedure. If they believe that they may have been harassed because of a protected characteristic, they are encouraged to raise the matter with the School. Allegations regarding potential breaches of this Policy will be treated in confidence and investigated in accordance with the relevant procedure.

False allegations: These procedures apply during and after termination of employment. Workers who make such allegations in good faith will not be victimised or treated less favourably as a result. False allegations of a breach in this Policy which are found to have been made in bad faith will, however, be dealt with under the disciplinary procedure.

Disciplinary action: If, after investigation, staff are proven to have engaged in any unwanted conduct because of a protected characteristic, or otherwise acted in breach of this Policy, they will be subject to disciplinary action. In serious cases, such behaviour may constitute gross misconduct and, as such, may result in summary dismissal. The School will always take a strict approach to serious breaches of this Policy.