# NPAT EQUALITY, DIVERSITY & INCLUSION POLICY

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| Associated Policies: | Allegations against staff and volunteers<br>Code of conduct<br>Dignity at work<br>Discipline<br>Flexible working policy<br>Trans guidance |
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Northampton Primary Academy Trust is proud to produce written materials that consider the British Dyslexia Association style guide principles.

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## 1. POLICY STATEMENT

Northampton Primary Academy Trust is committed to promoting equality of opportunity for all staff and job applicants.

We aim to create a supportive and inclusive working environment where people's unique differences are valued, and where all individuals can make the best use of their skills, free from discrimination, bullying, victimisation, or harassment, and where all decisions are based on merit.

We take allegations of discrimination seriously and address them promptly and confidentially, where possible.

All employees have a duty to act in accordance with this policy and the Dignity at work policy and always treat colleagues with dignity, as well as a duty not to discriminate against or harass other employees, regardless of their status.

All employees are personally responsible for ensuring that they adhere to the policy and promote our aims and objectives regarding equal opportunities.

The language we use matters, our aim is to be accessible and inclusive and have therefore used widely used and accepted terminology, however it is recognised that different communities and individuals have preferences on how they identify or describe themselves. We think it is important to respect a person's preference and expect all employees to do the same.

This policy does not form part of any employee's contract of employment, and it may be amended at any time following consultation. Elements of this procedure may be varied as appropriate in any case.

## 2. WHO DOES THIS POLICY APPLY TO

This policy applies to all staff, volunteers, governors and trustees of Northampton Primary Academy Trust.

This policy covers all individuals working at all levels and grades, including senior managers, employees, trainees, part-time and fixed-term employees, volunteers, casual workers, agency staff and governors (collectively referred to as staff in this policy).

## 3. POLICY REVIEW ARRANGEMENTS

We will continue to review the effectiveness of this policy to ensure it is achieving its objectives and in light of developments in legislation that affect our Trust's practice.

Staff are invited to comment on this policy and suggest ways in which it might be improved by contacting the Chief Executive Officer.

## 4. SCOPE AND PURPOSE

This policy applies to all aspects of our relationship with employees and to relations between employees at all levels. This includes job advertisements, recruitment and selection, training and development, opportunities for promotion, conditions of service, pay and benefits, flexible working requests, conduct at work, disciplinary and grievance procedures, and termination of employment.

We will take appropriate steps to create an environment which is inclusive and respectful, where individual differences are recognised and valued, and free of bullying, harassment, victimisation and discrimination.

We believe that an equitable, diverse and inclusive culture benefits not only our School/Trust but supports wellbeing and enables individuals to work more productively and innovatively because they feel safe to be themselves and feel that they belong.

In some circumstances, we may take proportionate positive action to support individuals with protected characteristics where there is evidence of underrepresentation or disadvantage.

We record equality data, monitor retention and pay equity, and act where appropriate on findings to reduce inequalities. An annual report on the gender pay gap is submitted annually to the board summarising key changes and any actions.

We comply with all statutory reporting requirements.

## 5. PROTECTED CHARACTERISTICS

Discrimination is being treated unfairly for one of the following reasons:

- Age
- Disability
- Being married or in a civil partnership
- Pregnancy or maternity
- Race (including colour, nationality, ethnic or national origin)
- Religion or belief
- Sex
- Sexual orientation
- Gender reassignment (inclusive of non-binary and gender-fluid individuals)

These are called protected characteristics in the Equality Act 2010. Discrimination based on any of these protected characteristics is against the law.

The Trust and our schools have a statutory duty to take reasonable steps to prevent sexual harassment of employees, in line with the Worker Protection (Amendment of Equality Act 2010) Act 2023.

## 6. DISCRIMINATION

Discrimination by or against an employee is generally prohibited unless there is a specific legal exemption. Discrimination may be direct or indirect and it may occur intentionally or unintentionally.

Direct discrimination occurs where someone is treated less favourably because of one or more of the protected characteristics set out above. For example, rejecting an applicant on the grounds of their race because they would not "fit in" would be direct discrimination.

Indirect discrimination is where there is a provision, criterion or practice that applies to everyone but adversely affects people with a particular protected characteristic more than others and is not justified. For example, a requirement to work full time adversely affects women because they generally have greater childcare commitments than men. Such a requirement will be discriminatory unless it is objectively justified.

Discrimination by perception is when a person is discriminated against because they are thought to have a particular protected characteristic when in fact they do not. If you discriminate against people because you think they are transsexual or gay, for example, then they will be protected even if they do not have these protected characteristics.

Discrimination by association means that a person is treated less favourably because they are linked or associated with a protected characteristic. The person does not have the protected characteristic, but they are treated less favourably than others because of a protected characteristic of a friend, spouse, partner, parent, or another person with whom they are associated.

Two specific types of discrimination apply only to disability: discrimination arising from disability and failing to make reasonable adjustments.

Harassment related to any of the protected characteristics is prohibited. Harassment is unwanted conduct that has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. Sexual harassment is conduct of a sexual nature that has the purpose or effect of violating someone’s dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment, and less favourable treatment related to sex

or gender reassignment that occurs because of a rejection of, or submission to, sexual conduct.

From 6 April 2026, disclosures about sexual harassment may also qualify as protected whistleblowing disclosures under the Employment Rights Act 1996 as amended. Employees who reasonably believe such concerns are in the public interest may raise them under the Whistleblowing Policy.

Victimisation is also prohibited. This is less favourable treatment of someone who has complained or given information about discrimination or harassment or supported someone else's complaint.

We recognise that areas of difference can translate into challenges, barriers, and biases that others may not face. The more areas of difference a person brings, the more this can be compounded; this is called “intersectionality”. We aim to tackle and eliminate these challenges through the commitments outlined in this policy and continuously nurturing an inclusive culture.

## 7. TRAINING AND PROMOTION

All managers must set an appropriate standard of behaviour, lead by example, and ensure those they manage adhere to the policy and promote our aims and objectives regarding equal opportunities. Managers will receive appropriate training on equal opportunities awareness and best practice for recruitment and selection. All new starters must attend appropriate training as part of their induction and all current employees must attend regular update training on at least a three-yearly basis. The Trust HR Manager has overall responsibility for equal opportunities training.

Employee training needs will be identified through regular appraisals. All employees will be given appropriate access to training to enable them to progress within the organisation, and all promotion decisions will be based on merit. Workforce composition and promotions will be regularly monitored to ensure equality of opportunity at all levels of the organisation. Where appropriate, steps will be taken to identify and remove unjustified barriers and to meet the special needs of disadvantaged or underrepresented groups.

## 8. SUPPORT RESOURCES

Support service and resource information for a variety of matters is available to all staff via our Trust SharePoint Homepage.

## 9. EMPLOYMENT PRACTICES AND CONDITIONS

Our employment practices and procedures are reviewed when necessary to ensure fairness and equity, and also updated in line with changes in the law.

Our conditions of service, benefits and facilities are reviewed regularly to ensure that they are available to all employees who should have access to them and that there are no unlawful obstacles to accessing them.

## 10. DISCIPLINE AND TERMINATION OF EMPLOYMENT

We will ensure that disciplinary procedures and penalties are applied without discrimination, whether they result in disciplinary warnings, dismissal or other disciplinary action.

We will ensure that redundancy criteria and procedures are fair and objective and are not directly or indirectly discriminatory.

## 11. DISABILITY DISCRIMINATION

If you are disabled or become disabled, we encourage you to tell us about your condition so that we can support you as appropriate. We understand that some people may find it hard to discuss their disability and that disability can be invisible. We expect everyone to uphold the values of treating people with dignity, trust and respect in creating a safe environment where people feel able to speak up about their experiences.

If you experience difficulties at work because of your disability, you should speak to your line manager to discuss any reasonable adjustments that would help overcome or minimise the difficulty. Your line manager may wish to consult with you and your medical adviser/s about possible adjustments. We will consider the matter carefully and try to accommodate your needs. If we consider a particular adjustment would not be reasonable, we will explain our reasons and try to find an alternative solution where possible.

We will monitor the physical features of our premises to consider whether they place disabled workers and job applicants at a substantial disadvantage compared to other employees. Where reasonable, we will take steps to improve access for disabled employees.

## 12. FIXED-TERM EMPLOYEES, CASUAL AND AGENCY WORKERS

We monitor our use of fixed-term employees, casual and agency workers, and their conditions of service, to ensure that they are being offered appropriate access to

benefits, training, promotion and permanent employment opportunities. We will, where relevant, monitor their progress to ensure that they are accessing permanent vacancies.

## 13. PART-TIME WORK

We 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. We will ensure requests to alter working hours are dealt with appropriately under our Flexible Working Policy.

## 14. BREACHES OF THE POLICY

If you believe that you may have been discriminated against, you are encouraged to raise the matter through our grievance procedure. If you believe that you may have been subject to harassment or bullying, you are encouraged to raise the matter through our Anti-Bullying and Harassment Policy.

Allegations regarding potential breaches of this policy will be treated in confidence and investigated in accordance with the relevant procedure. Employees who make such allegations in good faith will not be victimised or treated less favourably as a result. False allegations which are found to have been made in bad faith will, however, be dealt with under our disciplinary procedure.

Any employee who is found to have committed, authorised or condoned an act of discrimination, harassment, victimisation or bullying will be subject to disciplinary action. Such behaviour may constitute gross misconduct and, as such, may result in summary dismissal. We take a strict approach to serious breaches of this policy.

Sexual harassment may amount to both a conduct matter and a criminal matter, such as sexual assault allegations. In addition, harassment under the Protection from Harassment Act 1997, which is not limited to circumstances where harassment relates to a protected characteristic, is a criminal offence.