Last reviewed: October 2026
Next review due: Autumn term 2027

Cornerstone Academy Trust

Equality, Diversity & Inclusion Policy

Trust-wide policy for all pupils, staff, the wider school community and the general public

Policy owner	Designated Trust Safeguarding Lead and Executive Headteacher
Approval body	Personnel Committee
Updated	October 2026
Review cycle	Annual, or earlier following a change in law or guidance
Next review	Autumn Term 2027 or earlier if legislation, statutory guidance or technology materially changes
Applies to	All schools and operations of Cornerstone Academy Trust

Purpose

Cornerstone Academy Trust is committed to equality of opportunity, inclusion and dignity across its seven-campus, one-school community. The Trust will meet its obligations under the Equality Act 2010 and other applicable equality, employment, education and data protection law.

1. Purpose and commitment

Cornerstone Academy Trust is committed to equality of opportunity, inclusion and dignity across its seven-campus, one-school community. The Trust will meet its obligations under the Equality Act 2010 and other applicable equality, employment, education and data protection law.

The Trust seeks to remove unlawful discrimination and unnecessary barriers, promote fair access and participation, and ensure that decisions affecting pupils, staff, applicants, parents and carers, volunteers, contractors, visitors and service users are made fairly and on relevant evidence.

This policy does not form part of any employee's contract and may be amended following changes in law, guidance or the Trust's operational needs.

2. Scope

This policy applies across all Trust campuses and functions. Because equality law operates differently in employment, education and the provision of services, this policy separates the relevant duties where necessary.

- Pupils and prospective pupils, including admissions, education, access, participation and reasonable adjustments.
- Employees, workers, job applicants, agency staff, trainees, volunteers and contractors, including recruitment, pay, development, conduct and termination.
- Parents, carers, visitors, suppliers, service users and other members of the Trust community.
- Work-related activities away from Trust premises, including trips, training, conferences, social events and work-related online communications.

3. Legal framework

The principal legal framework for this policy includes:

- Equality Act 2010, including the Public Sector Equality Duty
- Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017, as applicable to the Trust
- Worker Protection (Amendment of Equality Act 2010) Act 2023
- Employment Rights Act 2025, including applicable commencement provisions
- Part-time Workers (Prevention of Less Favourable Treatment) Regulations 2000
- Fixed-term Employees (Prevention of Less Favourable Treatment) Regulations 2002
- UK GDPR and Data Protection Act 2018

This policy should be read with current Department for Education, Equality and Human Rights Commission, Acas and Home Office guidance as relevant to the issue concerned.

4. Protected characteristics and wider inclusion

The protected characteristics under the Equality Act 2010 are:

- age
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race

- religion or belief
- sex
- sexual orientation

The Trust's commitment to dignity, fairness and inclusion is wider than the statutory list. The Trust will seek to ensure fair treatment for all members of its community, including those who may experience disadvantage because of socio-economic circumstances, caring responsibilities, special educational needs, English as an additional language, instability in education or other personal circumstances. This wider commitment does not change the statutory definition of protected characteristics.

5. Public Sector Equality Duty

When exercising its public functions, the Trust will have due regard to the need to:

- eliminate discrimination, harassment, victimisation and other conduct prohibited by the Equality Act 2010;
- advance equality of opportunity between people who share a relevant protected characteristic and people who do not; and
- foster good relations between people who share a relevant protected characteristic and people who do not.

Equality considerations will be addressed consciously and at the time proportionate decisions are taken. Relevant decision records, committee papers or equality impact assessments may be used to demonstrate how material equality considerations have been addressed.

The Trust will publish information demonstrating compliance with the Public Sector Equality Duty at least annually and will prepare and publish one or more specific and measurable equality objectives at least every four years. Progress against the objectives will be monitored and reported to trustees.

6. Equality in education and for pupils

The Trust will not unlawfully discriminate against, harass or victimise a pupil or prospective pupil in relation to matters within the scope of the Equality Act 2010. The Trust will apply lawful admissions arrangements and provide education, benefits, facilities and services in accordance with the Act.

The Trust will monitor relevant evidence to identify material disparities, barriers or disadvantages and will take proportionate action where appropriate. Particular regard will be given to the experiences and outcomes of pupils who share protected characteristics and to pupils who face other educational disadvantage.

Bullying or prejudicial behaviour connected with a protected characteristic will be addressed under the Trust's behaviour, anti-bullying and safeguarding arrangements as appropriate.

7. Disability and reasonable adjustments

The Trust will comply with the Equality Act 2010 duties relating to disability, including the duty to make reasonable adjustments where the statutory test is met. It will not discriminate because of something arising in consequence of disability unless the treatment can be objectively justified as required by law.

For disabled employees and job applicants, where the Trust knows, or could reasonably be expected to know, of a disability and a substantial disadvantage, the Trust will consider and make such adjustments as are reasonable. The individual will normally be consulted, and relevant Occupational Health or medical advice may be considered where appropriate. Agreed adjustments will be reviewed when circumstances change.

For disabled pupils and service users, the Trust will comply with applicable anticipatory reasonable adjustment duties, including consideration of auxiliary aids and services where required. Accessibility planning will be maintained separately and cross-referenced to this policy.

The law permits more favourable treatment of disabled people in appropriate circumstances; the Trust will not treat a non-disabled person more favourably simply because a disabled person has received a lawful adjustment or disability-related support.

8. Equality in employment

Equality principles apply throughout the employment relationship, including advertising, recruitment and selection, terms and conditions, pay, benefits, training, appraisal, promotion, flexible working, conduct, grievance and disciplinary processes, redundancy and termination.

Employment decisions will be based on lawful, relevant and proportionate criteria. Part-time and fixed-term workers will not be treated less favourably contrary to applicable legislation.

9. Forms of unlawful conduct

9.1 Direct discrimination

Direct discrimination generally occurs where a person is treated less favourably because of a protected characteristic. Different statutory rules or exceptions may apply to particular characteristics and circumstances, including age and lawful occupational requirements.

9.2 Indirect discrimination

Indirect discrimination may occur where a provision, criterion or practice applies to everyone but puts people sharing a protected characteristic at a particular disadvantage and puts the individual concerned at that disadvantage, unless the provision, criterion or practice can be objectively justified as a proportionate means of achieving a legitimate aim.

9.3 Discrimination arising from disability and reasonable adjustments

The Trust will not treat a disabled person unfavourably because of something arising in consequence of disability where this would be unlawful, and will comply with applicable reasonable adjustment duties.

9.4 Harassment

Harassment is unwanted conduct related to a relevant protected characteristic which has the purpose or effect prescribed by the Equality Act 2010, including violating dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment. The statutory harassment provisions do not apply in precisely the same way to every protected characteristic or context.

9.5 Sexual harassment

Sexual harassment is unwanted conduct of a sexual nature which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment. Less favourable treatment because a person rejected or submitted to specified unwanted conduct is also prohibited by the Equality Act 2010.

9.6 Victimisation

Victimisation occurs where a person is subjected to a detriment because they have done, or are believed to have done or may do, a protected act under the Equality Act 2010. This includes, for example, making a good-faith allegation of discrimination or supporting another person's allegation.

9.7 Association and perception

The Equality Act can protect people against certain direct discrimination or harassment because of association with a person who has a protected characteristic, or because a protected characteristic is perceived to apply to them. The precise scope depends on the statutory provision concerned.

10. Preventing sexual harassment and third-party harassment

The Trust will take proactive steps to prevent sexual harassment at work and the applicable provisions concerning harassment of employees by third parties.

The Trust will keep preventative arrangements under review, informed by foreseeable workplace risks and any relevant incidents or concerns. Measures may include:

- regular review of harassment risks and preventative controls;
- clear standards of behaviour for staff and people interacting with Trust workers;
- appropriate training for staff and managers;
- accessible routes for reporting concerns, including an alternative route where the normal manager is implicated;
- prompt, fair and proportionate responses to reported or observed concerns;
- appropriate action to address risks arising from parents, carers, visitors, contractors, suppliers, service users or other third parties; and
- review of incidents, themes and preventative measures while respecting confidentiality and data protection.

Depending on the circumstances, steps in response to third-party behaviour may include setting behavioural expectations, changing methods of contact, restricting access, ending or modifying contractual arrangements, or referring a matter to another appropriate body. Any action will be lawful, proportionate and informed by safeguarding and safety considerations where relevant.

11. Recruitment and selection

The Trust will seek to ensure that job applicants do not suffer unlawful discrimination. Selection criteria will be relevant and proportionate to the role, and reasonable adjustments will be considered throughout recruitment.

Pre-employment questions about health or disability will only be asked where lawful, including where necessary to identify recruitment-process adjustments, establish whether an applicant can carry out a function intrinsic to the work with reasonable adjustments considered, support permitted monitoring or positive action, or determine whether a lawful occupational requirement applies. Internal approval does not itself make a question lawful.

Where an occupational requirement is proposed, it must fall within the Equality Act 2010 exception and be a proportionate means of achieving a legitimate aim. HR or legal advice should be obtained before relying on such a requirement.

The Trust will conduct right-to-work checks in accordance with current Home Office requirements. Checks will be applied consistently without assumptions based on a person's name, appearance, accent, race or nationality, using the prescribed document or Home Office online checking process as applicable.

12. Positive action

The Trust may take proportionate positive action where permitted by the Equality Act 2010 to address disadvantage, meet different needs or address disproportionately low participation. Positive action will be evidence-based and will be distinguished from unlawful positive discrimination.

13. Training, development, pay and progression

Staff will have fair access to relevant learning and development. Pay and progression decisions will be taken in accordance with the Trust's Pay Policy and applicable law, using relevant and transparent criteria. The Trust will keep employment practices under review to identify unlawful or unjustified barriers.

14. Roles and responsibilities

14.1 Board of Trustees

- approve this policy and oversee the Trust's compliance with its equality duties;
- approve or oversee published equality objectives and receive proportionate progress information;
- seek assurance that material strategic decisions properly address relevant equality considerations;
- promote inclusive, transparent and accessible trustee recruitment and seek a broad field of suitably skilled candidates without making unlawful appointment decisions; and
- seek assurance that the Trust maintains effective arrangements to prevent workplace harassment.

14.2 CEO and senior leaders

- provide visible leadership on equality, dignity and inclusion;
- ensure this policy is implemented consistently across the Trust;
- ensure appropriate risk assessment, training, monitoring and reporting arrangements;
- ensure incidents and concerns are handled promptly under the correct procedure; and
- ensure equality considerations are integrated into relevant decision-making.

14.3 Managers

- model appropriate behaviour and address concerns promptly;
- consider reasonable adjustments and seek HR advice where appropriate;
- ensure employment decisions are supported by lawful and relevant criteria; and
- not tolerate retaliation, victimisation, harassment or discriminatory behaviour.

14.4 All staff and workers

Everyone covered by this policy must treat others with dignity, comply with this policy, complete required training, cooperate with reasonable investigations and raise concerns appropriately. No person should participate in discrimination, harassment or victimisation.

15. Raising concerns and complaints

The appropriate route will depend on the person raising the concern and its nature:

- Employees and workers: Grievance Procedure, Dignity at Work/anti-harassment arrangements or Whistleblowing Policy where appropriate.
- Job applicants: HR or the recruitment contact specified for the process.

- Pupils: a trusted member of staff, with behaviour, anti-bullying or safeguarding processes used as appropriate.
- Parents and carers: the Trust Concerns and Complaints Policy, unless a safeguarding or other specialist procedure applies.
- Volunteers, contractors, visitors and service users: the relevant Trust manager or nominated contact.
- Safeguarding concerns: the Trust safeguarding and child protection procedures take priority where applicable.

Concerns may be addressed informally where appropriate, but the Trust may need to take formal action even where an individual does not wish to make a formal complaint, for example where there is a wider safety, safeguarding or workforce risk.

Confidentiality will be respected so far as reasonably possible, but cannot be guaranteed where disclosure is necessary for a fair investigation, safeguarding, legal compliance or appropriate action.

No action will be taken against a person merely because a good-faith concern is not upheld. Deliberately false or malicious allegations may be dealt with under the appropriate procedure following a fair investigation. An allegation will not be regarded as malicious simply because there is insufficient evidence to uphold it.

16. Breaches

Alleged breaches will be considered under the relevant Trust procedure. Discrimination, harassment, sexual harassment, victimisation or retaliation may constitute misconduct and, depending on seriousness and circumstances, may amount to gross misconduct. Any disciplinary decision will follow the Trust's disciplinary procedure and applicable law.

17. Equality monitoring and data protection

The Trust may collect and analyse equality information to understand representation, access, participation, outcomes and the effect of policies and practices. Any personal data will be handled in accordance with the UK GDPR, Data Protection Act 2018, the Trust Data Protection Policy and applicable privacy notices.

Where equality monitoring involves special category personal data, the Trust will ensure an appropriate lawful basis and condition for processing. Monitoring data used for recruitment equality purposes will be kept separate from selection decisions wherever appropriate, access will be restricted, and reporting will normally be aggregated or anonymised. Particular care will be taken where small numbers create a risk of identification.

18. Monitoring, publication and review

The Trust will monitor the operation and impact of this policy using proportionate information. Relevant themes may include reported incidents, recruitment and workforce information, reasonable adjustments, pupil evidence, complaint themes, training and progress against published equality objectives.

The Board of Trustees will receive proportionate assurance information that enables oversight while protecting individual confidentiality. The policy will be reviewed at least annually and sooner where there is a material change in legislation, statutory guidance, Trust structure or identified risk.

19. Related Trust documents

- Equality Information and Objectives
- Accessibility Plans
- Staff Code of Conduct

- Recruitment and Selection Policy
- Pay Policy
- Flexible Working Policy
- Grievance Procedure
- Disciplinary Procedure
- Dignity at Work / Anti-Harassment arrangements
- Whistleblowing Policy
- Safeguarding and Child Protection Policy
- Behaviour and Anti-Bullying Policies
- Concerns and Complaints Policy
- Data Protection Policy and privacy notices
- Admissions arrangements
- Procurement and supplier requirements, where applicable