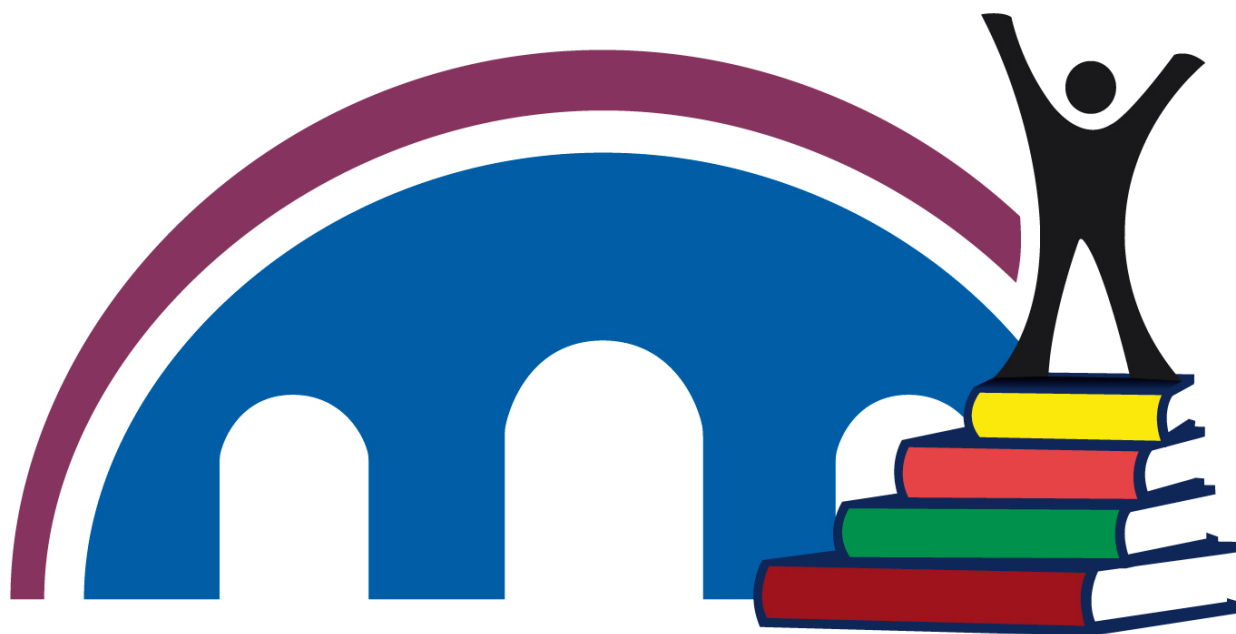




Bridge Academy Trust

EQUALITY, DIVERSITY & INCLUSION (EDI) POLICY

September 2026

Summary of Changes

Section Number	Current	Proposed Amendment

The policy has been substantially re-structured to remove duplicated explanatory content relating to equality legislation and protected characteristics, and to refocus the document on how the Trust applies equality, diversity and inclusion in practice across employment. Legal protections remain unchanged.

The policy has been retitled to reflect a shift from predominantly explaining equality law to focusing on how the Trust applies equality, diversity and inclusion in practice. The previous policy was largely made up of detailed legal definitions of protected characteristics, whereas the revised policy places greater emphasis on inclusive culture, behaviours and the practical application of equality through recruitment, training, reasonable adjustments and the management of employment matters.

Date of Draft Policy: (this is the month/year the policy was drafted)	April 2026	
Last approved version Frequency of review	June 2025 annually	
Consultation with Staff Required	Yes ☐	No ☒
Period of Consultation (if required)	From N/A	To N/A
Trustees Committee Reviewing Document	Trustee Policy Review Committee	
Date of Trustees Meeting at which Policy Finally Approved (if required)	16 th June 2026	
Date of Adoption of Policy	1 st September 2026	
Date Policy available on Central Area/www (if appropriate)	1 st September 2026	
Reviewer	People Director	
Brief historic history & where updated advice has been sourced	The Key for School Leaders ACAS Equality Act 2010	

Contents

INTRODUCTION	1
SCOPE	1
ROLES & RESPONSIBILITIES	2
MONITORING	3
EQUALITY IMPACT ASSESSMENT (EIA)	3
Legislation	4
Definitions	4
EQUALITY	4
DIVERSITY	4
INCLUSION	4
PROTECTED CHARACTERISTICS	4
FORMS OF DISCRIMINATION	5
DIRECT DISCRIMINATION	5
INDIRECT DISCRIMINATION	5
PERCEPTION DISCRIMINATION	5
ASSOCIATIVE DISCRIMINATION	6
DISABILITY-RELATED DISCRIMINATION	6
HARASSMENT	6
VICTIMISATION	6
UNCONSCIOUS BIAS	6
THIRD-PARTY HARASSMENT	7
EQUALITY, REASONABLE ADJUSTMENTS AND JOB REQUIREMENTS ..	7
APPLYING OUR POLICY TO RECRUITMENT AND SELECTION	7
APPLYING OUR POLICY TO TRAINING, PROMOTION, PAY AND CONDITIONS OF SERVICE	8
APPLYING OUR POLICY WHEN TERMINATING EMPLOYMENT	8
BREACHES OF THIS POLICY	9
APPENDIX A – DEFINITIONS OF PROTECTED CHARACTERISTICS	10

INTRODUCTION

- 1.1 The Trust is committed to promoting equality, diversity and inclusion in all aspects of employment and to creating a working environment in which all individuals are treated with dignity, fairness and respect.
- 1.2 We comply with our obligations under the Equality Act 2010, which prohibits unlawful discrimination, harassment (including sexual harassment) and victimisation on the grounds of age, disability, gender reassignment, pregnancy and maternity, marriage and civil partnership, race, religion or belief, sex and sexual orientation, and any combination of these protected characteristics. The Trust will always act lawfully and may take proportionate and lawful positive action to support employees who share a protected characteristic where appropriate.
- 1.3 In addition to our statutory duties, the Trust adopts policies, practices and procedures that define expected standards of behaviour and promote an inclusive culture. This includes extending protection beyond the statutory minimum, for example in relation to political belief and social background, and complying with other relevant legislation, including the Gender Recognition Act 2004.
- 1.4 This policy sets out the Trust's overarching approach to equality, diversity and inclusion in the context of our values and objectives. We recognise the value of a diverse workforce and the contribution that different perspectives, backgrounds, skills and experiences bring to the Trust. We are committed to fostering an employment culture in which people feel confident of being treated fairly and with dignity and respect.
- 1.5 This policy complements other Trust policies and procedures that support equality, diversity and inclusion and should be read alongside them.
- 1.6 As part of the application of this policy, the Trust may collect, process and store personal data, including special category data, in accordance with our Data Protection Policy. All personal data will be handled in compliance with UK data protection legislation, including the UK General Data Protection Regulation and the Data Protection Act 2018.

SCOPE

- 2.1 This policy applies to all individuals working for or on behalf of the Trust, including Trustees, Governors, employees, workers, consultants, contractors, agency staff, trainees, casual workers and volunteers.
- 2.2 It applies to all stages of employment and working relationships, including recruitment and selection, terms and conditions, training and development, promotion, conduct, disciplinary processes, sickness absence, and the termination of employment or engagement. This policy focuses on employment and does not cover the provision of services to our pupils/students.
- 2.3 The policy applies to behaviour in the workplace and in any work-related setting, including off-site events, training, work-related social activities, and online or digital environments where there is a connection to work.

ROLES & RESPONSIBILITIES

- 3.1 Everyone working for or on behalf of the Trust has a responsibility to promote equality, diversity and inclusion and to uphold the principles and requirements of equality legislation. This policy is supported by specific responsibilities below.
- 3.2 It is the responsibility of the Trustees to:
- a) Provide strategic leadership and oversight in relation to equality, diversity and inclusion across the Trust;
 - b) Support the effective implementation of this policy across the Trust;
 - c) Ensure that employment, recruitment and people-management policies and practices are fair, inclusive and non-discriminatory in both wording and operation;
 - d) Seek assurance that equality considerations are embedded in decision-making and governance processes;
 - e) Ensure that complaints relating to discrimination, harassment (including sexual harassment) or victimisation are addressed appropriately and effectively;
 - f) Ensure that appropriate training is available to Trustees and employees to support compliance with equality legislation and the promotion of inclusive practice.
- 3.3 It is the responsibility of the Chief Executive Officer (CEO), CFOO, Headteacher/Head of School and Other Managers to:
- a) Ensure that this policy is applied consistently and lawfully within employment and management practices;
 - b) Promote an inclusive working environment and lead by example in upholding equality, diversity and inclusion principles;
 - c) Ensure employees, workers and volunteers are aware of this policy and receive appropriate training;
 - d) Take prompt and appropriate action where behaviour or practices may breach this policy;
 - e) Monitor the operation of relevant policies and procedures within their areas of responsibility.
- 3.4 It is the responsibility of all those working for or on behalf of the Trust (including Governors, employees, workers, consultants, contractors, agency staff, trainees, casual workers and volunteers) to:
- a) Act in accordance with equality legislation and comply with the policy;
 - b) Treat others with dignity and respect and contribute to an inclusive working environment;
 - c) Participate in training and other initiatives designed to promote equality, diversity and inclusion;

- d) Not engage in discrimination, harassment (including sexual harassment) or victimisation of any kind;
- e) Raise concerns or report suspected breaches of this policy to their line manager or another appropriate person.
- f) Perform their role to the required standard, with appropriate support and reasonable adjustments provided by the Trust where applicable.

3.5 The HR Team will provide advice and guidance to managers and employees on the application of this policy.

EQUALITY IMPACT ASSESSMENT (EIA)

- 4.1 The Trust uses Equality Impact Assessments (EIAs) to help ensure that its policies, practices and decisions comply with the Equality Act 2010 and do not have an unjustified adverse impact on individuals who share protected characteristics.
- 4.2 An Equality Impact Assessment will be undertaken where appropriate when developing, reviewing or making significant changes to policies, practices or provision that may affect employees or other members of the Trust community.
- 4.3 The process for completing, recording and reviewing Equality Impact Assessments is set out in the Trust's Equality Impact Assessment Policy. Completed EIAs will be used to inform decision making and identify any actions required to mitigate potential adverse impact.

MONITORING

- 5.1 The Trust recognises that equality of opportunity can only be achieved by monitoring the impact of its policies and practices and using this information to inform continuous improvement. The Trust will monitor the application and impact of this policy on staff and applicants and will review it as necessary.
- 5.2 As a public body, the Trust is committed to meeting its duties under the Public Sector Equality Duty (PSED). In exercising its functions, the Trust will have due regard for the need to:
 - a) Eliminate unlawful discrimination, harassment including sexual harassment and victimisation;
 - b) Advance equality of opportunity; and
 - c) Foster good relations between people who share a protected characteristic and those who do not.
- 5.3 In accordance with the specific duties under the Equality Act 2010, the Trust will publish equality information that demonstrates compliance with the PSED and will set and review measurable equality objectives at least every four years. Progress against these objectives will be monitored and reported as appropriate, including through governance reporting.
- 5.4 Monitoring may include, where appropriate;

- a) Workforce data relating to recruitment, retention, progression and development;
- b) Feedback from staff engagement activities, including surveys and consultation; and
- c) Governance and leadership representation.

5.5 All monitoring will be carried out in accordance with data protection legislation, and data will be anonymised where appropriate.

LEGISLATION

- 6.1 The Equality Act 2010 provides a framework to protect individuals from unlawful discrimination, harassment and victimisation in employment and other areas, including education and the provision of services.
- 6.2 The Act protects individuals who share one or more protected characteristics and promotes equality of opportunity and good relations.
- 6.3 As a public body, the Trust is also subject to the Public Sector Equality Duty (PSED), which requires it to consider how we can positively contribute to the advancement of equality and good relations.

DEFINITIONS

- 7.1 For the purposes of this policy:

EQUALITY

- 7.2 Equality is about ensuring fairness and removing barriers so that individuals are not treated less favourably because of a protected characteristic and have equal access to opportunities.

DIVERSITY

- 7.3 Diversity refers to recognising, respecting and valuing difference in its broadest sense, including differences in background, experience, perspective and personal characteristics.

INCLUSION

- 7.4 Inclusion describes the extent to which individuals feel respected, valued and able to participate fully in the workplace. An inclusive working environment enables individuals to contribute effectively, raise concerns or ideas and have access to opportunities and resources on an equal basis.

PROTECTED CHARACTERISTICS

- 7.5 Under the Equality Act 2010, it is unlawful to discriminate against individuals on the basis of one or more of the following protected characteristics:
 - a) age,
 - b) disability,
 - c) gender reassignment,

- d) marriage and civil partnership,
- e) pregnancy and maternity,
- f) race,
- g) religion or belief,
- h) sex, and
- i) sexual orientation.

- 7.6 Protection under the Act applies whether an individual shares one or more protected characteristics.
- 7.7 The Trust values diversity in its widest sense and seeks to promote inclusion for all individuals. However, only the characteristics listed above are defined as protected characteristics under the Equality Act 2010.
- 7.8 Definitions of each protected characteristic are set out in Appendix A.

FORMS OF DISCRIMINATION

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

DIRECT DISCRIMINATION

- 8.2 Direct discrimination occurs where an individual is treated less favourably because of one or more protected characteristics.
- a) *For example, rejecting a job applicant because of their religious views or because of their sexual orientation.*
- 8.3 In limited circumstances, direct discrimination may be lawful where there is a genuine occupational requirement. Any such requirement must be proportionate and a legitimate means of achieving a lawful aim. This will apply only in exceptional circumstances within the Trust.

INDIRECT DISCRIMINATION

- 8.4 Indirect discrimination occurs where a provision, criterion or practice is applied to everyone but has the effect of disadvantaging people who share a protected characteristic and cannot be objectively justified.
- a) *For example, requiring a job to be performed full-time rather than part-time may disadvantage some groups and would be unlawful unless it can be objectively justified.*

PERCEPTION DISCRIMINATION

- 8.5 Discrimination by perception occurs where an individual is treated less favourably because they are believed to have a protected characteristic, whether or not that belief is correct.

- a) *For example, treating someone less favourably because they are perceived to be gay or transgender.*

ASSOCIATIVE DISCRIMINATION

8.6 Discrimination by association occurs where an individual is treated less favourably because of their association with someone who has a protected characteristic.

- a) *For example, treating an employee unfavourably because they care for a disabled family member.*

DISABILITY-RELATED DISCRIMINATION

8.7 There are two forms of discrimination that apply only to disability:

- a) **Discrimination arising from disability**, where a disabled person is treated unfavourably because of something connected to their disability, unless this treatment can be objectively justified; and
- b) **Failure to make reasonable adjustments**, where an employer fails to take reasonable steps to remove disadvantages experienced by a disabled person.

HARASSMENT

8.8 Harassment is unwanted conduct related to a protected characteristic which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual. The Equality Act 2010 prohibits three types of harassment:

- a) Harassment related to a protected characteristic;
- b) Sexual harassment;
- c) Less favourable treatment because an individual submits to; or rejects, sexual harassment or harassment related to sex.

8.9 Pregnancy and maternity, and marriage and civil partnership, are not standalone protected characteristics for the purposes of harassment. However, harassment related to pregnancy or maternity may amount to harassment related to sex, and harassment related to civil partnership may amount to harassment related to sexual orientation.

VICTIMISATION

8.10 Victimisation occurs where an individual is subjected to a detriment because they have made, supported, or are believed to have made or supported a complaint, grievance or allegation of discrimination or harassment, or have done anything in connection with this policy or related legal proceedings.

UNCONSCIOUS BIAS

8.11 Unconscious bias refers to attitudes or stereotypes that affect decisions and behaviour without an individual's conscious awareness. While unconscious bias is not, of itself, unlawful, it can influence decision-making and contribute to discriminatory outcomes.

- 8.12 The Trust addresses unconscious bias through training, awareness-raising and fair, objective decision-making processes.

THIRD-PARTY HARASSMENT

- 8.13 Third-party harassment occurs where an employee is subjected to harassment (including sexual harassment) related to a protected characteristic by a third-party, such as parent, carer, visitors, contractor or member of the public.
- 8.14 Allegations of third-party harassment will be addressed in accordance with the Trust's procedures for breaches of this policy.

EQUALITY, REASONABLE ADJUSTMENTS AND JOB REQUIREMENTS

- 9.1 Nothing in this policy removes the expectation that employees must carry out the duties of their role effectively. While the Trust will make reasonable adjustments where required, having a protected characteristic does not exempt an employee from performing the essential requirements of their job.

APPLYING OUR POLICY TO RECRUITMENT AND SELECTION

- 10.1 The Trust is committed to ensuring that no job applicant is discriminated against because of a protected characteristic. Recruitment and selection decisions will be based on merit, taking account of relevant skills, experience and abilities.
- 10.2 Recruitment procedures are kept under review to ensure they are fair, objective and inclusive. This policy should be read alongside the Trust's Recruitment and Selection Policy.
- 10.3 Selection criteria set out in person specifications will be relevant to the role and reviewed regularly. Shortlisting and selection decisions will be made objectively against the requirements of the role and, where practicable, by more than one person.
- 10.4 Job advertisements will be drafted to avoid stereotyping or language that may discourage individuals with particular protected characteristics from applying.
- 10.5 Where appropriate, the Trust may take proportionate steps to promote vacancies in a way that supports equality of opportunity and encourages applications from a diverse range of candidates.
- 10.6 Applicants will not be asked questions about health or disability before a job offer is made, except where necessary to:
- a) establish whether an applicant can carry out an intrinsic function of the role, subject to reasonable adjustments;

- b) identify any reasonable adjustments required for the recruitment process; or
 - c) support equality monitoring, which will not form part of the selection decision.
- 10.7 Any offer of employment will be conditional upon the appropriate pre-employment checks, including medical fitness, in accordance with Keeping Children Safe in Education and the Education (Health Standards) (England) Regulations 2003, where applicable.
- 10.8 Applicants will not be asked questions about pregnancy, maternity, future family plans, gender identity or gender history, or any other matter that could give rise to discrimination.
- 10.9 The Trust is required by law to ensure that all employees have the right to work in the UK. Right to work checks will be applied consistently to all prospective employees, regardless of nationality or background, in accordance with current immigration legislation.
- 10.10 As part of the recruitment process, the Trust may collect equality monitoring data in line with its Recruitment Privacy Notice and Data Protection Policy. Providing this information is voluntary and will not influence recruitment decisions. Where collected, data will be anonymised and used only for monitoring and equality purposes.

APPLYING OUR POLICY TO TRAINING, PROMOTION, PAY AND CONDITIONS OF SERVICE

- 11.1 The Trust is committed to ensuring equality of opportunity in training, development, promotion and pay. Decisions will be based on objective criteria, including skills, experience and performance, and in accordance with relevant Trust policies.
- 11.2 Training and development needs will be identified through appraisal and review processes. Employees will be given appropriate access to training to support them in their role and, where appropriate, to support career progression.
- 11.3 Pay, grading and promotion decisions will be made in accordance with the Trust's Pay Policy and relevant national and local conditions of service, ensuring compliance with equal pay and equality legislation.
- 11.4 Benefits, facilities and working arrangements will be reviewed periodically to ensure they are accessible and do not create unlawful barriers for particular groups.
- 11.5 Part-time and fixed-term employees will not be treated less favourably than comparable full-time or permanent employees, unless such treatment can be objectively justified, and will receive pro-rata terms and conditions where appropriate.

APPLYING OUR POLICY WHEN TERMINATING EMPLOYMENT

- 12.1 The Trust will ensure that redundancy selection criteria and procedures are fair, objective and non-discriminatory.
- 12.2 Disciplinary, capability and dismissal procedures will be applied consistently and without discrimination, in accordance with the Trust's relevant policies and procedures.

BREACHES OF THIS POLICY

- 13.1 Any allegation or concern that this policy has been breached will be taken seriously and handled in a fair, sensitive and timely manner, in accordance with the appropriate Trust policy or procedure.
- 13.2 Employees who believe they have experienced or witnessed discrimination, harassment (including sexual harassment) or victimisation should raise the matter with their line manager in the first instance, or with another appropriate manager where the line manager is the subject of the concern. Where appropriate, concerns should be raised in accordance with the Trust's Grievance Policy.
- 13.3 Applicants for employment, visitors, or other members of the Trust community who believe that they have been subjected to, or have witnessed, discrimination, harassment or victimisation should raise their concerns with the Headteacher / Head of School and/or Chief Executive Officer, or via the Trust's Complaints Policy, as appropriate.
- 13.4 No individual will be treated less favourably for raising a concern or allegation in good faith under this policy. Any act of victimisation will be treated as a serious matter.
- 13.5 Where a breach of this policy is established, appropriate action will be taken, which may include formal action in accordance with the Trust's Discipline & Dismissal Policy. Serious breaches may constitute gross misconduct and could result in dismissal.

APPENDIX A – DEFINITIONS OF PROTECTED CHARACTERISTICS

The Equality Act 2010 identifies the following nine protected characteristics.

Age

Age refers to a person's age or perceived age, including belonging to a particular age group or range of ages.

Disability

Disability refers to a physical or mental impairment which has a substantial and long-term adverse effect on a person's ability to carry out normal day-to-day activities. This includes conditions that are progressive, fluctuating or recurring.

Gender reassignment

Gender reassignment applies to a person who is proposing to undergo, is undergoing, or has undergone a process (or part of a process) for the purpose of reassigning their sex by changing physiological or other attributes of sex.

Marriage and civil partnership

Marriage refers to a legal union recognised under UK law, whether between a same-sex couple or a different-sex couple.

Civil partnership refers to a legal relationship available to both same-sex and opposite-sex couples. Protection under this characteristic applies only to marriage and civil partnership, not to other forms of relationship status.

Pregnancy and maternity

Pregnancy refers to the condition of being pregnant or expecting a baby.

Maternity refers to the period following childbirth and includes maternity leave. Protection applies during pregnancy and to any illness suffered as a result of pregnancy or childbirth.

Race

Race refers to a group of people defined by race, colour, nationality (including citizenship), ethnic or national origins, or perceived race.

Religion or belief

Religion or belief includes religious and philosophical beliefs and a lack of belief. A belief must be genuinely held and influence a person's life choices or way of living to be protected.

Sex

Sex refers to a person being a man or a woman.

Sexual orientation

Sexual orientation refers to a person's sexual orientation towards persons of the same sex, persons of the opposite sex, or persons of any sex, whether actual or perceived.