



Equal Opportunities Policy

Diversity, Equity, Inclusion and Belonging

Updated: Summer 2023

Updated by: SAE (DH- Pastoral and Boarding)

Linked documents: Accessibility Plan 2022-2025, Admissions Policy, Anti-bullying Policy, Behaviour Management Policy, Statement of Boarding Principles and Practice, Repton Prep's Safeguarding Children and Child Protection Policy, PSHE and RSE Policy, The Through School Equality, Diversity and Inclusion Strategy (see Appendix 4)

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Links to other Policies

This policy is a Whole-School Policy. It is relevant to all staff and applies to all pupils from Nursery to Year 8.

It is informed by:

- The Equality Act 2010
- The UK GOV document: The Equality Act 2010 and Schools: Departmental advice for school leaders, school staff, governing bodies and local authorities May2014.
- Schools Transgender Guidance
- The AGBIS document: Towards an Equality, Diversity and Inclusion Strategy
- KCSIE 2022
- The NMS for boarding (updated September 2022)
- Political impartiality in Schools 2022

It should be read in conjunction with the following policies and protocols:

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- Accessibility Plan 2022-2025
- Admissions Policy
- Anti-bullying Policy
- Behaviour Management Policy
- Statement of Boarding Principles and Practice
- Repton Prep's Safeguarding Children and Child Protection Policy
- PSHE and RSE Policy
- The Equality, Diversity and Inclusion Strategy (see Appendix 4)

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Key Staff

James Aldred JAldred@repton.org.uk	Senior Deputy Head	i/c Day-to-Day Management of the School
Stuart Elks SElks@repton.org.uk	Deputy Head Pastoral and Boarding Designated Safeguarding Lead	i/c Discipline i/c Pastoral management and development i/c Houseparents i/c Safeguarding and child protection
Kellee-Anne Cavill KCavill@repton.org.uk	Deputy Head Pre-Prep Deputy Designated Safeguarding Lead	i/c Pre-Prep i/c Safeguarding and child protection
Ed Saunders ESaunders@repton.org.uk	Head of Boarding	i/c Boarding Community
Samantha Krbacevic SKrbacevic@repton.org.uk	Deputy Head Academic	i/c Academic Management i/c CPD
Adam Watkinson AWatkinson@repton.org.uk	The Chaplain	i/c spiritual wellbeing
Joanne Ireland JIreland@repton.org.uk	Head of PSHE	i/c PSHE
Alexander Wilde AWilde@repton.org.uk	Head of Learning Enhancement	i/c SEND
Nicola Blunt NBlunt@repton.org.uk	Lead School nurse	i/c Health and Wellbeing Centre
Jane Pettitt prephealth@repton.org.uk	Prep School Nurse	i/c Individual pupil wellbeing

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REPTON SCHOOL WHOLE-SCHOOL POLICIES **EQUAL OPPORTUNITIES: PUPILS**

I General

- 1.1 Promoting equal opportunities is fundamental to the ethos of Repton Prep School. We welcome pupils from a diverse range of backgrounds, which we believe enriches our community and prepares our pupils for the wider world beyond school. We aim to provide a comfortable, welcoming and tolerant environment in which every individual feels valued and can flourish and to develop a culture in which diversity is not merely accepted but celebrated. Respect for others is enshrined in the School's Values and Aims and in the Repton Code of Conduct.
- 1.2 The School is committed to the promotion of equal opportunities for all, regardless of race, religion or belief, gender (including gender reassignment), sexual orientation, age and disabilities. It is mindful of the protected characteristics set out in the Equality Act 2010.
- 1.3 In addition to scholarships, the School offers a number of means-tested bursaries in order to help make it possible for those who would otherwise not be able to afford the fees, and who meet the School's admission criteria, to attend the School. (see Appendix 5)
- 1.4 Unfair discrimination or any form of derogatory remarks, practice or material must be seen to be quickly and firmly rejected by members of staff, who should be familiar with and uphold the School's Anti-Bullying Policy and the Staff Code of Conduct. The Anti-Bullying Policy is published annually to staff and to parents on the School website; there are also child friendly versions around school for Pre-Prep and Prep.
- 1.5 Information regarding pupils' situations and support needs is available on the school database. Pastoral and welfare information can be found on the school MIS, maintained by the Deputy Heads and Heads of Year; EAL and SEND information is maintained by the Head of EAL and the Head of Learning Enhancement respectively; medical information is updated by the School Nurse.
- 1.6 We take positive action to provide equal opportunity to all students and staff and others using school facilities

2. Guiding Principles

2.1 In fulfilling our legal obligations, we are guided by the following principles:

- All pupils are of equal value.
- We aim to reduce and remove inequalities and barriers that may already exist.
- We recognise and respect diversity and actively promote the Equality Act and protected characteristics it identifies.
- We promote a shared sense of belonging in our community. This includes fostering positive attitudes and relationships between staff and pupils
- As part of our work on Equal Opportunities we aim to consult and involve the whole school community.

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3. Aims

- We expect pupils and staff to treat each other with respect and dignity at all times.
- We expect that all pupils will have the opportunity to achieve their full potential and be motivated to succeed, secure in the knowledge of their own worth.
- We recognise the importance of preparing our pupils for life in a diverse society where they exercise respect and understanding for everyone.

4 Religion and Worship

- 4.1 Repton has a strong Christian tradition and all pupils are expected to attend regular assemblies where hymns are sung with prayers. These services are an expression of the identity and values of the school community and, while they are conducted within the tradition of the Church of England, there is a strong emphasis on general moral development and the individual's journey of faith. The School promotes the values of personal integrity, tolerance and respect for others, and a sense of responsibility for the more vulnerable within their community. Pupils are encouraged to participate in the planning and conduct of assemblies on topics of their choosing, in agreement with staff. The Chaplain visits the Prep regularly to address the School community from both a faith and secular perspective.
- 4.2 The School supports religious observance such as Ramadan and allows greater flexibility across routines and timings for those undertaking periods of fasting and prayer.

5 Race, language and culture

- 5.1 The School welcomes applications from staff and pupils of any race, nationality and ethnic origin. Repton has always been an international school and the current pupil body includes those from many different countries, including China and the Far East, Russia, Ukraine, Turkey, the Middle East, Germany and America. Pupils whose families are based outside the UK comprise a mixture of foreign nationals and expatriates.
- 5.2 All official activities within the School, including lessons, are conducted in English and in order to cope with the academic demands of the curriculum and the social environment of the School, pupils are expected to be competent and confident English speakers. Pupils for whom English is a second language are tested as part of the Admissions process, to ensure that they can access the curriculum, and there is a programme for those pupils who are not native speakers of English.
- 5.3 Care is taken in allocating pupils who are non-native speakers of English to boarding houses in terms of bedders, to create the optimum opportunities for them to be fully integrated into the house and school communities. Pupils are also encouraged to speak English in all group situations, in order to ensure that there is no exclusion of any individual. Staff, however, recognise the demands that this places on pupils, particularly in the early stages of their Repton career, and will support appropriately. It is also appreciated that at times those with a common language will wish to socialise together and will, naturally, speak in their native tongue on these occasions. There is often the opportunity to link pupils between Prep and Senior schools.
- 5.4 There is a member of staff – the Head of EAL - with particular responsibility for monitoring and promoting the welfare and pastoral needs of pupils from cultures and countries beyond the UK.

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- 5.5 The intimacy of boarding creates an ideal environment in which pupils can acquire an appreciation and understanding of each other's cultures and develop qualities such as mutual respect and tolerance. Opportunities will be taken to celebrate the cultural and linguistic diversity of the School: for example, meals that celebrate the cuisine and culture of different countries; recognising international festivals such as Lunar New Year and Maslenitsa; the inclusion of prayers and readings from different religions around the world; the range of books in the library.

6 Gender

- 6.1 There is a well-established and successful history of co-education at Repton Prep: founded in 1940, it was made co-educational in 1972. The gender balance is currently approximately 49% boys and 51% girls.
- 6.2 All pupils enjoy equal access to the opportunities and facilities offered by the School and the vast majority of activities, including lessons, are co-educational, with just a small number, notably sports practices and aspects of the PSHE programme, gender-specific for practical reasons. Care is taken to ensure that as far as possible there is an appropriate balance of gender when allocating positions of responsibility or creating opportunities within the academic and extracurricular programmes, whilst still reflecting the abilities, interests and commitment of the individual pupils.
- 6.3 Boys and girls are accommodated in separate boarding houses but the School is committed to providing the best possible standard of accommodation in all houses and has an ongoing programme of refurbishment. While each House has its own distinct atmosphere, all are managed in reference to a common set of school policies, rules, regulations and practices and there is regular co-ordination and discussion between the Hosueparents and SMT to maintain consistency and to promote best practice.
- 6.4 LGBTQ+ pupils are received supportively and positively, within a culture that promotes respect for individuality, tolerance and diversity.
- 6.5 Additional provision is made for Transgender pupils (see Appendix 3)
- 6.6 All pupils are required to adhere to the School's Dress Regulations. The Prep adopts a Uniform A and Uniform B approach so that it does not dictate pupil uniform by gender and there is a choice, however all pupils are expected to adhere to the same standards of smartness.
- 6.7 Any requests for variations on religious or other grounds will be considered by the Head. These must be consistent with the School's ethos on dress and its Health and Safety requirements.

7 Age

- 7.1 The School accommodates pupils aged approximately between 3 and 13 and therefore spans an age range in which individuals develop very significantly in terms of personal confidence and independence.
- 7.2 Any variation in the School's rules or procedures relating to pupils of different ages is based on the paramount requirement to safeguard the welfare of individuals. Year 8 pupils are typically allowed greater freedom than those in young years: for example, they have their own common room, and greater trust is placed in them on school trips.

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8 Disability

- 8.1 Members of staff should be prepared to give every assistance to any existing or potential pupil with a disability. The School is aware of its responsibilities under the Special Educational Needs and Disability Act and has a three-year accessibility Plan. The Head of Learning Enhancement will maintain the LDD Register, ensure that all staff are aware of pupils' LDD/SEND and offer appropriate support and guidance. Management of individual pupils' needs resides primarily with the Head of Learning Enhancement, in conjunction with the Senior Management Team, who will ensure that appropriate accommodation is made of the physical, educational and social environments and liaise with all relevant and appropriate bodies within the School and beyond. The School has in recent years successfully accommodated a number of individuals with specific needs.
- 8.2 Any sanctions given to pupils will take into account any SEN or disability of the individual pupil.

9 Dietary requirements

- 9.1 The School provides an extensive range of meals (breakfast, lunch and dinner) and snacks (MnB and Pit Stop) throughout the day for day pupils and boarders. All main meals are taken in the Dining Room and this builds a sense of community and camaraderie amongst the pupils, fosters good manners, develops positive interaction and relationships with adults and enables staff to monitor pupils, particularly with regard to their general well-being and their diet, regularly and unobtrusively.
- 9.2 There is a wide choice of food available and the school seeks to accommodate the dietary requirements and, as far as possible, preferences of pupils. In addition to the main dish of the day, a vegetarian option is always available for non-meat eaters, as well as salads and baked potatoes (both normal and sweet potatoes with toppings). Fresh fruit is offered as an alternative to the main pudding. Accommodation will be made for those who have particular dietary needs for either medical or cultural reasons, such as halal meat or gluten-free diets. Feedback is regularly sought from pupils via the Food Committee and they are encouraged to engage positively in menu-planning via this mechanism and pupil surveys.
- 9.3 Responsibility for providing an appropriate, nutritious and varied diet for all pupils lies with the Prep Catering Team.

10 Education

- 10.1 The School actively promotes the values of tolerance, respect for others and the celebration of diversity by, for example:
- The example set by staff
 - Whole-school assemblies, Prep and Pre-Prep assemblies, special events
 - the activities of academic activities such as Debating Club.
 - charitable activities such as the Christmas Fayre, the House Charities and other fundraising initiatives
 - engagement with the wider community via church concerts and events
 - links with other schools in the Repton Family
 - links with other local schools through educational and outreach initiatives

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- PSHE and tutorial programmes
- other curriculum opportunities – for example, in English, Drama, Religious Studies, TPR and History
- promotion of positive role models and pupil voice
- celebrations of diversity and understanding of the wider world.

11 Diversity, Equity, Inclusion and Belonging (DEIB) at Repton Prep

- 11.1 The School has appointed a Deputy Head Inclusion and Wellbeing to lead the strategic development of Repton's programme as a through school initiative.
- 11.2 The Deputy Head Inclusion and Wellbeing has created a through school EDI action plan
- 11.3 The Deputy Head Inclusion and Wellbeing works with senior colleagues at Repton and Repton Prep and in the Support Staff team to ensure a cohesive, compliant, whole-school culture of belonging.
- 11.4 The Deputy Head Inclusion and Wellbeing leads the strategic development of Repton's regional, community and educational partnerships and is responsible for the promotion of diversity and inclusion within Repton School and to society beyond.
- 11.5 The Deputy Head Pastoral and Boarding and the Deputy Head Pre-Prep lead DEIB at the Prep School

DEIB in the curriculum

- 11.6 The School works to ensure that the PHSE programme effectively and successfully addresses issues such as racial prejudice and discrimination, sexual harassment, peer-on-peer abuse, homophobia, issues around gender identity and sexual choices, issues of faith and extremism, and that it actively promotes and celebrates the contribution of all groups to society, particularly those who have historically been under-represented.
- 11.7 These topics and values are also embedded within the 'Pastoral Plan' for each academic year which is delivered through our Assemblies programme, Tutor time and Wellbeing Wednesday activities.
- 11.8 The Schools works to ensure that as far as possible within subject specialisms and examination specifications, pupils consider themes of diversity and are exposed to positive stories of the contribution of under-represented groups.

Initiatives around DEIB

- 11.9 The School aims to ensure that there are initiatives on diversity and inclusion for the pupil body as part of the pastoral and academic programmes.
- 11.10 Work is underway to develop an overview of DEIB in the curriculum and expand the provision of it to embed themes across all aspects of school life.
- 11.11 Pupil voice is important in ensuring that all views and opinions are heard and respected, and our pupil committees help to deliver this aspect.

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Monitoring DEIB related matters

- 11.12 The Deputy Head Pastoral and Boarding uses the School's MIS to track DEIB concerns that have been raised and where appropriate, these are added to the complaints log
- 11.13 The Deputy Head Pastoral and Boarding works to provide education on DEIB related matters if a disciplinary matter relates to an DEIB issue
- 11.14 If a Head's Detention or suspension sanction is issued for an DEIB related matter, part of the sanction is to write a reflection on the lessons learnt, in order to educate them

12 Monitoring

- 12.1 The School monitors, evaluates and reviews the success of its Equal Opportunities policy by, for example:
 - review and application by SMT, Houseparents and other school bodies;
 - discussion within staff inset sessions and staff meetings
 - critical discussion with pupil committees
 - the rolling PSHE/SMSC audit (which includes Fundamental British Values)
 - DEIB curriculum audit

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Appendix I:

Staff Code of Conduct:

Repton Staff: Inclusion and Belonging

1. All staff should feel valued by the School for the work they do.
2. All staff, regardless of gender, religion, marital status, disability, age, ethnicity, or sexual orientation should feel respected as individuals and as professionals.
3. Repton is more than a School, it is a community in which no member of staff should feel excluded or unrecognised.
4. As a community, all staff benefit from, and are expected to contribute fully to boarding school life in its many, seven-day-a-week forms: academic, pastoral, extra-curricular, social, spiritual and cultural.
5. All staff should expect colleagues to be fair and courteous in all professional interactions.
6. Communication between colleagues – learning from, referring to, advising and appreciating one’s peers – is a vital part of the Repton community, both within and beyond one’s own department, discipline or expertise.
7. In times of difficulty, all staff should be able to rely on the help of their colleagues and feel confident to use the existing support structures for any help they might need.
8. Staff should feel able to raise any issue which affects their professional life, or raises concerns about colleagues or the School, without fear of criticism or of an opinion being held against them.
9. In setting an example to pupils and in reassuring parents, few professions demand as much in determining the way staff must talk, dress and act. We model high standards of behaviour and appearance to the student body. All staff must observe professional standards, but this need not be at the expense of one’s own identity.
10. All staff should always feel able to offer constructive comments or suggest ideas in the interests of the pupils, the School or of their colleagues.
11. All staff should feel that their work is fairly assessed and managed, some through a standardised appraisal programme, in an open and consultative process.
12. The Head is accessible to all staff on a daily basis.

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Appendix 2:

Pupil Voice and Community at Repton Prep:

At Repton Prep, our pupils' views are very important to us. We have various committees and councils, and pupils complete regular surveys and questionnaires to help us to hear to their views, wishes and experiences. We understand that children and young people need to be provided with meaningful opportunities to share their experiences, views and hopes about their school. Pupils need to know that it is safe and that it is important for them to express their views on what happens at school. They need to know that what they say is valued and will be listened to and considered.

We recognise the importance of our pupils having opportunities to take on more active roles in supporting around school, and particularly for our older pupils to act as role models for the younger ones. Pupils can be elected from all year groups to a variety of councils and committees, including:

- School Council
- Food Committee
- Eco Committee
- Sports' Committee

Additionally, pupils can also take on various leadership roles including:

- Heads of Houses
- Boarding House Prefects
- Sports' team captains
- Library Assistants
- Form Recycling Monitors
- Head Chorister

When our pupils get to the top of the school, they can also take on a variety of voluntary positions of responsibility, known as the R-Team. A key aim of the R-Team is to give our pupils responsibility, to gain their direct input and feedback and to help to build their confidence; it also allows them to positively influence school life. R-Team roles are varied: Lost Property monitors, Reading Buddies for younger pupils, Charity Representatives, Theatre Assistants, Music Assistants, Break and Dining Assistants, Peer Group and Young Pupil Mentors, Pre-Prep Support Assistants.

We place great value on developing our young people and preparing them effectively to become well respected adults and global citizens. Repton Prep is not just about developing pupils' academic skills and talents but recognising and developing the key interpersonal skills required to be successful in the wider world.

Pupils at Repton Prep are expected to uphold the values of decency and consideration for others in their conduct beyond the school site and outside of term time. This includes online and in their use of social media. The School reserves the right to consider under its disciplinary procedures any conduct which brings the School into disrepute or impacts adversely upon the community or the individuals within it. This includes, but is not limited to, any breaking of the law, involvement

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with drugs, possession of extremist or pornographic material, and offences on social media or the internet.

Our simple philosophy is: Treat others as you would wish to be treated yourself. There is no formal set of school rules. Children are encouraged at all times and in all places to follow a simple Repton Prep Code:

C – Common sense – use it

A – Aim high

R – Respect – for yourself and others

E – Enjoy

This simple code lies at the heart of all that we represent as a school community. Whilst not explicitly stated before Year 2, the Code forms the basis of our behaviour management system and is implicitly understood by all. Pre-Prep pupils follow a simplified version of the Repton Prep Code called Golden Rules. We aim to provide a structured environment where pupils understand the ground rules and expectations are clearly defined and taught.

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Appendix 3:

Provision for Transgender Pupils and Staff

- 1.1. The School recognises that the rights and protection of transgender people are currently a rapidly developing area of law. As such, the School is actively working to ensure that there are systems in place with a view to ensuring that standards are being met, for all pupils, including those who are questioning their identity and or/ experiencing gender-related dysphoria.
- 1.2. The School aims to work closely with all pupils affected by policies and decisions relating to gender and also with their parents. In doing so the aim is to find sensitive and pragmatic solutions which ensure that every pupil:
 - Is safe
 - Has their privacy and dignity respected
 - Is enabled to access education and participate fully in the life of the School
- 1.3. The School recognises that there will be a need for flexibility of approach to supporting and including pupils experiencing gender-related dysphoria. At the same time, the other academic and pastoral needs of the pupil should not be overlooked.

2 Definitions of Terms:

Transgender children may be: *“Children or young people, experiencing gender-related distress, gender-questioning or needing support around gender”*

It is recognised that transgender children are not a homogeneous group. Some transgender pupils may thrive during a period of gender-questioning. Others may find that this period is accompanied by a level of distress which can impact on their functioning and or development.

The protected characteristic of “gender reassignment” is defined in Section 7 of the Equality Act, 2010. Some transgender pupils may have other protected characteristics in addition to or instead of gender reassignment.

The School will always seek to support any pupil who is questioning their gender or expressing a desire to identify as a person not of their assigned sex at birth. As soon as possible, parents should be brought into any such discussion. As part of this process, a counselling service is always available alongside the support of the Pastoral team.

3 Areas of consideration for School:

3.1 Bullying, respect and self-esteem:

The School recognises that no person should live with intimidation, ridicule or ostracism on account of their identity. It is the aim of the School to value the dignity of every pupil and to affirm this. There is a clear Anti-Bullying Policy which is published on the website, alongside age appropriate pupil expectations. The PSHE curriculum also actively encourages respect for other people with

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reference made to the Equality Act. In addition there is an emphasis on the active promotion of Fundamental British values including individual liberty and respect.

3.2 Political balance:

When Political issues are brought to the attention of the pupils these are delivered in a balanced way. It is the aim of all staff to ensure that opposing views are presented fairly.

3.3 Relationships and Sex Education (RSE):

Respect for others is a clear aspect of the statutory RSE legislation. At Repton Prep, RSE is taught within the wider PSHE programme. The programme aims to ensure that teaching is sensitive and age-appropriate. This means that pupils are being equipped to make decisions for themselves about how to live their own lives. There is also an emphasis placed on the need to respect the rights of others to make their own decisions.

3.4. Gender stereotypes:

The School is alive to the issues of gender stereotypes including: everyday sexism, misogyny, homophobia and gender stereotypes. There is active promotion of a culture where these stereotypes are not tolerated and are properly tackled.

3.5 Admissions:

The School recognises that a pupil's sexual orientation or gender identity is not a lawful consideration in determining admission. This is per the guidance in the Gender Recognition Act, 2004.

3.6 Uniform:

The School looks to ensure that consideration is given to any request regarding a change of uniform. These requests should be made individually to the Senior Deputy Head.

3.7 Sport:

All pupils are actively encouraged to take part in Sport at Repton Prep. Consideration will be given to separating pupils by sex for Sport where strength, stamina or physique will have an impact. It is recognised that sport can be restricted to pupils of one birth sex where the restriction is necessary in the interests of fairness and or safety. The School is guided by the Sport England advice or by the relevant governing bodies of individual sports. The School will document its approach to participation by transgender pupils where appropriate.

3.8 Toilets and changing rooms:

Toilets must be suitable for all pupils. The provision of these facilities will have regard for the "sex and special requirements" of pupils. Consideration will also be given to the privacy of the individual pupil. There will also be thought given to access to the disposal of sanitary products. There are labelled "inclusive" toilets around the School site.

3.9 Confidentiality:

There may be situations when a pupil confides in a member of staff about sexuality and or gender identity but does not want this information disclosed more widely.

Where possible the School will work cooperatively with parents as primary carers. At the same time the School will take into account the wishes and feelings of the child as per Gillick competency.

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Where appropriate the School will work with pupils in an appropriate and sensitive way to help them understand the implications of their decisions. School staff should also manage pupil's expectations and avoid assurances of confidentiality.

The School will encourage pupils to discuss the situation with their parents and where appropriate support them to do so.

4. Transgender specific considerations:

The School recognises that a change of name is normally a trigger point for providing support:

The School will work to accommodate the pupil's preferences.

There will be support for the pupil to communicate about this to their family and peers.

Consideration will also be given to:

- How long the pupil considers they have been transgender
- Whether or not they are receiving treatment
- Whether welfare plans are in place
- Guidance from children's social care if anyone at the School has concerns about the pupil's welfare or considers them at risk of harm

4.2. Name:

All Pupils should be registered at the School by their legal name. A pupil cannot change their name without parental consent before they are 16. Repton Prep will work with parents and pupils to record a preferred name on the information management systems.

A Pupils right to decide name and gender identity is linked to capacity. In a situation where there is parent and pupil disagreement on names and pronouns the School may need to submit an Early Help Referral.

All name and gender changes will be handled sensitively and respectfully by the School.

Even if a transgender child is using a different name, they may be required to use their legal name for formal exams. In these circumstances, we would speak with the child and their family and liaise with the relevant exam board to clarify the situation.

Technically, children can be entered under any name with an Examination Board. However, it is a very complex matter. Once a result is accredited it will need to be linked with a Unique Pupil Number (UPN) or Unique Learner Number (ULN) which existed in the school census information submitted in January of the examination year. UPNs and ULNs are only linked with legal names, not preferred names. It is possible for examination certificates to be issued in the preferred name, but any young person finding themselves in this position should discuss this issue with the School and parents to ensure the best way forward.

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Prior to examinations the School will ensure a strategy is agreed with the child and their parents, then agreed with the destination senior school or examination board.

4.3. *Risk Assessment, supervision and safeguarding:*

The School aims to safeguard and promote the welfare of all its pupils. The aim of the School is to foster healthy and respectful peer-to-peer communication and behaviour. It is recognised that LGBT pupils can be targeted and that national data indicates that incidents of homophobic and transphobic bullying are common in schools.

5. **Staff:**

The School recognises that employees are protected from discrimination based on their gender identity. The working environment should not in any way be intimidating, degrading, hostile or offence to staff with a protected characteristic

It is recognised that there is scope for conflict between protected characteristics – religion and belief, sexual orientation and gender identity.

Appendix 4:

The Equality, Diversity & Inclusion Strategy

I Introduction

Times change and we change with them, grafting new ideas on to the traditional virtues of the School's Values and Aims in the development of well balanced, socially aware, global citizens.

The currency of Equality, Diversity and Inclusion has always been a part of our Repton community, enshrined in the Repton Code of Conduct and the Equal Opportunities Policy. We insist on the highest standards of behaviour in the daily life of the School. Safeguarding and Child Protection is at the forefront of what we do and this Equality, Diversity and Inclusion Strategy springs naturally from that clear focus on individual care, safety and belonging.

Moving forward, it is incumbent upon the School to respond purposefully now to the change prompted by Black Lives Matter and George Floyd, by Sarah Everard and Everyone's Invited and by the Transgender debate. We need to make sure that these issues, and others relating to the protected characteristics of the 2010 Equality Act are embedded in a modern, informed Repton culture.

This document is intended primarily to ensure a culture of Equality, Diversity and Inclusion for our pupil body and to identify and explain the consequences this has for staff in teaching and caring for them.

However, the processes and principles of EDI extend across all staff, academic and support, and both schools, senior and Prep. Operations and the Prep (VH) will develop separate site/work-specific strategies from this model ensuring overall congruence with the aims and objectives while adapting methods to suit what are different environments with their own Compliance Inspections.

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2 Aims

1. To ensure that all pupils enjoy the same right to a happy, safe and fulfilling experience at Repton regardless of race, gender or gender identity, sexual orientation, religion, disability, background or age.
2. To ensure that Repton is compliant, legally and regulatorily.
3. To ensure that staff are sufficiently trained in Equality, Diversity, and Inclusion in order to model values effectively.
4. To ensure that EDI values are embedded in the taught curriculum; via PSHE and RSE, in subject curriculums, in the choice of visiting speakers, topics, events, trips and tours.
5. To ensure that there is a zero-tolerance stance on all forms of discriminatory behaviour.
6. To ensure and develop still further that sense of individual identity and a confidence in belonging to a community in which everyone is valued for themselves.
7. To ensure equality of opportunity.
8. To ensure that pupils feel that their concerns and disclosures will be listened to and taken seriously as part of a process which may involve liaison with external agencies.

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3 Identification of Terms

Diversity is about the ways people differ. These differences should be recognised, celebrated and treated as a natural part of society.

Equality is a natural extension of diversity and is based on the idea of fairness, whilst recognising that everyone is different.

Inclusion means that all people regardless of their abilities, disabilities, or health care needs, have the right to be respected and appreciated as valuable members of their community.

Equity (in this context) is about giving people what they need in order to make things fair. It means giving more to those who need it, which is proportionate to their own circumstances, in order to ensure that everyone has the same opportunities, for example providing more support to a disadvantaged student so they can reach their full potential.

Zero Tolerance In practice, this means taking all allegations seriously. It does not mean that the same actions will always be taken if a report is upheld; instead there should be a range of options in terms of sanctions with proportionality being a principle in determining consequences. Zero tolerance means that the leadership will make it possible and safe for anyone, no matter their position or contractual status, to be active in shaping a climate where harassment is never ignored, minimised or excused. Where claims to zero tolerance sit alongside an absence of action, lived experiences undermine the value of the claim. Contradictory signals risk damaging the reputation, internal and external of the organisation and the belief of the staff or students concerned, that here is a serious intent to change culture. At the heart of zero tolerance practice is the certainty that the organisation will never do nothing in response to knowledge of harassment, will always support those who report, sanction perpetrators and will proactively ensure that equality and non-discrimination inform its work

4 Legal Requirements & Considerations

The Equality Act 2010 (Equality Act)

The law governing discrimination in respect of employment and the provision of goods and services, which includes provision of education, is set out in the Equality Act.

The key purpose of the Equality Act is to protect people from unfair and unjust treatment on the grounds of a 'protected characteristic'. The Act contains nine protected characteristics:

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gender, age, disability, marriage and civil partnership, pregnancy and maternity, race, sexual orientation, religion or belief, and gender reassignment.

The Act generally relies on individual litigation-driven enforcement. The Equality Act makes it unlawful for schools to discriminate, harass or victimise applicants, pupils or staff on the basis of their protected characteristic. The Equality Act applies to schools, including their pupil admissions, staff recruitment, provision of education, facilities and disciplinary processes (see below for certain exemptions for schools and charities).

Legally, there are different types of discrimination under the Equality Act:

- Direct discrimination occurs where a person is treated less favourably than others because of their (or a family member's) actual or perceived protected characteristic.
- Indirect discrimination occurs where a provision, criterion or practice is applied which disadvantages people with a protected characteristic, and which cannot be justified as a proportionate means of achieving a legitimate aim.
- Disability discrimination, which includes:
 - Direct and indirect discrimination
 - Discrimination arising from disability - where someone is treated unfavourably because of something arising in consequence of their disability and it cannot be justified as a proportionate means of achieving a legitimate aim; and
 - Failure to comply with the duty to make reasonable adjustments - schools have a duty to make reasonable adjustments for disabled employees and pupils and they will be in breach of the Equality Act if they fail to make reasonable adjustments to alleviate disadvantages caused by a disability.
- Harassment is unwanted conduct related to a protected characteristic which has the purpose or effect of violating a person's dignity or creating a hostile, humiliating or offensive environment for them. For the purposes of harassment, the protected characteristics of pregnancy and maternity and marriage and civil partnership are not relevant. Harassment includes conduct of a sexual nature and less favourable treatment of an individual because they rejected or submitted to sexual harassment or harassment related to sex or gender reassignment

5 EDI and Inspection: Regulatory and Statutory Responsibilities

It is important that we recognise that EDI will be a significant component of any Inspection and we will need to look at this in three main ways:

1. That the key elements of EDI are present in all of the relevant paperwork – policies, protocols, website, minutes of meetings etc
2. That the various constituencies of the School – staff, pupils and parents - have sight of EDI in action and understand its role in the School.
3. That there is evidence of it in action – a record of its presence within our operations as evidence of ii.

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Independent School Standards

The Education (Independent School Standards) Regulations 2014 (Regulations) set out standards that apply to independent schools in England. The standards are contained in the Schedule to the Regulations.

The Independent School Standards guidance (applicable to England) is intended to help proprietors of independent schools understand the obligations under the Regulations. Inspectors take the guidance into account when reporting to the Secretary of State on the extent to which standards are being met, or are likely to be met, in relation to an independent school. The Department for Education would also take it into account when making decisions about regulatory or enforcement action on individual schools.

The Regulations embed the principle of respect for equality at the heart of school life. Schools are expected to actively promote principles that “further tolerance and harmony between different cultural traditions by enabling pupils to acquire an appreciation of and respect for their own and other cultures”. Schools must teach respect for protected characteristics through the Personal, Social, Health and Economic (PSHE) curriculum.

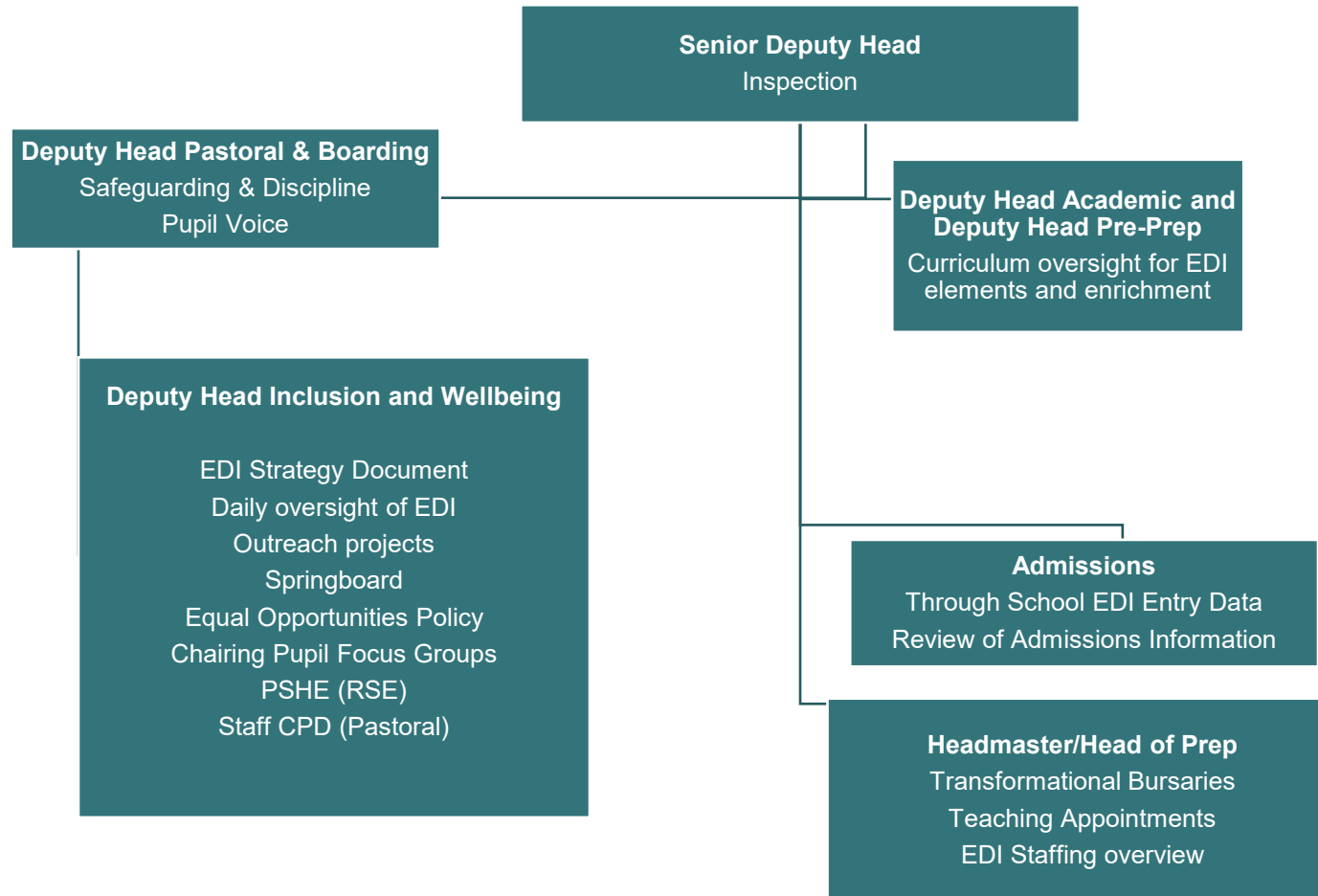
Independent Schools Inspectorate

The ISI Inspection Framework (applicable to England) sets out that inspectors will evaluate (among other things):

- The extent to which pupils respect and value diversity within society, show respect for and appreciation of their own and other cultures, and demonstrate sensitivity and tolerance to those from different backgrounds and traditions.
- Provision that prepares children for life in modern Britain: respect, positive contribution; development of fundamental British values; developing understanding and appreciation of diversity and differing needs within a community; and
- The extent to which leaders fulfil their statutory duties; for example, under the Equality Act 2010 and other duties and in relation to the ‘Prevent’ strategy and safeguarding and safer recruitment.

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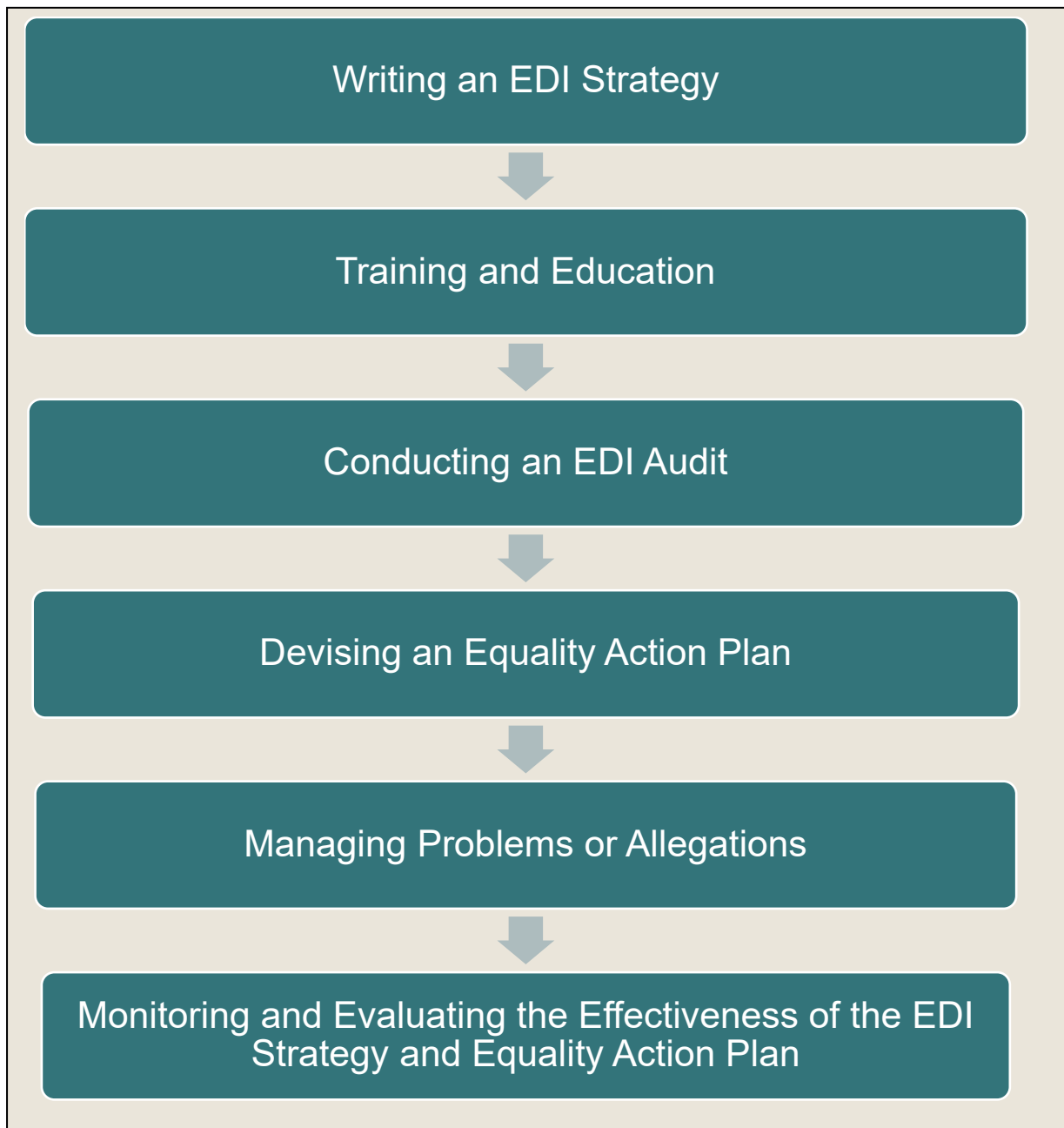
6 Our Whole-School Approach to EDI (Embedding an Equal, Diverse and Inclusive Culture)





7 Repton School Strategy for Pupils and Teaching/Pastoral Staff

In broad terms, there are six key stages:



8 Implementing the Strategy

1. There is a need to ensure that the principles of EDI are clearly part of policy, both for the pupils' sake and to be compliant with any Inspection. Legislation already informs the Equal Opportunities Policy but this EDI document will sit as a permanent appendix to it.
2. Owners of all policies will review them in the light of EDI principles. Many policies will have reference to qualities such as 'fairness' or 'openness' or 'opportunity' but these need to be checked and, where appropriate replaced with 'equality', 'diversity' and 'inclusion'.
3. This is a whole-school, whole-staff issue. CPD will become a part of INSET, with both academic and support staff receiving training together wherever possible alongside job-specific instruction. In particular, staff will need instruction on how 'unconscious bias' works to inform careful assessment of their particular processes and responsibilities.
4. Risk Assessments will also need to reflect a specifically EDI focus too, particularly House RAs, in order to base this understanding at the heart of the pastoral process. This will be work for the Deputy Head Pastoral and the Health and Safety Manager.
5. Admissions will regularly review material and data to monitor the diversity of intake.
6. At the heart of the planned expansion in RISL is the opportunity to provide more transformational bursaries to invite talent from all social and ethnic groups, alongside our existing commitment to the Springboard programme to increase the diversity of the School.
7. The Headmaster and the Executive will review EDI issues relating to all aspects of the School – Senior, Prep and Operations - on an annual basis.
8. The EDI Equality Action Plan will proceed from this strategy document, establishing a baseline and setting out realistic expectations.

8 Individual Responsibilities

The Deputy Head Pastoral & Boarding will:

- In conjunction with the DH Pre-Prep and via the annual Pupil Surveys, enable all pupils to voice experiences of, and attitudes to, protected characteristics to establish an understanding of how EDI matters impact on the School to enable an informed response.
- Under the guidance of the Head, establish clear rules for uniform and appearance which balance the need for smart formality with an appropriate reflection of individual need. A new uniform is being investigated currently and pupil voice will be a key component of its selection.
- In consultation with the Head, and thereby with recourse to the School's PR consultants, other external agencies where necessary, the governing body and the Marketing Department, as well as the DHP and the pastoral team, oversee responses to events of national significance (eg. BLM, Sarah Everard) which impact on EDI issues and pupils within the school.
- Ensure that, with reference to all stakeholders, for all Inspection purposes the School is compliant, in relation to pastoral and safeguarding.
- Ensure ongoing CPD at staff INSET.
- Oversee the implementation of EDI through the creation of the EDI Equality Action Plan and annual report.
- Maintain a log of all minor staffing issues relating to EDI alongside scrutiny of any staff disciplinary or professional matter for EDI characteristics.
- Monitor all aspects of behaviour amongst the pupil body, ensure that data is collected, logged and scrutinised and sanctions assessed for incidents involving ethnicity, religion, gender and gender identity.
- Ensure that sanctions given are appropriate to the needs of particular individuals eg. SEND pupils and work set in timed conditions and involve no discrimination, either overt or unconscious.
- Where appropriate, consult parents of children with protected characteristics prior to entry, in tandem with the Admissions Department.
- With the SMT, ensure that pupil voice is surveyed, measured and recorded, not least through co-chairing pupil focus groups (see above).
- Oversee the report on EDI to the Pastoral Committee on a termly basis
- Deliver the principles of EDI systematically through the PSHE and RSE programmes and through any associated talks or speakers in order to achieve both regulatory compliance and effective outcomes for our pupil body.

	<ul style="list-style-type: none"> • Ensure that the Pupil Committees are a true reflection of the diversity of the School and that selection processes take into account equality of opportunity.
The Deputy Inclusion and Wellbeing (Through School) will:	<ul style="list-style-type: none"> • Continue to work on projects with our partnership schools and the local community in order to open Repton’s facilities to a wider audience. • Oversee the Springboard programme. • Lead discussion of significant EDI events eg. Black History Month, LGBTQ+ Pride events, Lunar New Year, Maslenitsa and oversee celebratory or informative events in consultation with the DHP and AHP. • Report on EDI to the Pastoral Committee on a termly basis.
The Deputy Head Academic will:	<ul style="list-style-type: none"> • Conduct a review of the Repton curriculum to ensure that it reflects, on a Through-School basis, the key concepts of EDI, offering positive examples of protected characteristics and creating opportunities for diversifying course content. • With the Head of Learning Enhancement, ensure that reasonable adjustments are made for individuals with additional needs and disabilities. • Ensure that educational initiatives and the Enrichment programme have an EDI component and that external speakers are properly vetted. • Deliver educational initiatives which are open to the local community as part of the Outreach programme. • Ensure that via the Curriculum Policy, departments have policies in place on critical aspects of EDI eg, race in English Literature in the role of Crooks in ‘Of Mice and Men’ or how we teach colonialism in History or offering both a range of British and World history as a Through-School model. • Report on EDI to the Academic Committee on a termly basis.
Governors will:	<ul style="list-style-type: none"> • Review the safeguarding elements of EDI at the termly Pastoral Committee – details to be provided as part of the DHP’s report, including any sanctions given for harassment, racial bullying and lower level microaggressions. • Review the management of EDI in the School as a standing item on the agenda for the Pastoral Committee; a report to be submitted by the DHIW and overseen by the DHP. • Receive a summary of EDI implementation in full governing body reports, following an annual review by the Head and the Executive.

Appendix 5:

Transformational Bursaries

- 1.1 The School is committed to providing transformational bursaries for a number of pupils each academic year
- 1.2 The transformational bursary project is a major part of the School's outreach work
- 1.3 The Deputy Head Inclusion and Wellbeing works with the Deputy Head Admissions and Marketing and the Repton Foundation, to encourage applications for the School's transformational bursaries programme, where appropriate in tandem with local authorities and with national organizations
- 1.4 The School works actively with the Royal Springboard Foundation and provides a number of places for Springboard pupils. These may be at two points of entry - Year 9 and Year 12

Royal National Children's SpringBoard Foundation (royalspringboard.org.uk)
- 1.5 The School also works with other national organizations such as Buttle, where appropriate

Home - Buttle UK
- 1.6 The hope of the transformational bursaries programme is to provide places for pupils at the School from minorities or under-represented groups.
- 1.7 The Deputy Head Inclusion and Wellbeing oversees a mentoring programme for the recipients of transformational bursaries. This involves pupils from both Repton Prep and Repton Senior