KEYS
Academy Trust

Equity, Diversity and Inclusion (EDI) Policy (TKAT)

KEYS Academy Trust

Unlocking the future

Version control summary and overview details

TKAT Statutory Policy • All schools require a policy on this area. • There should be no changes to the core text. • LGBs will minute that they have noted Trust approval and will adopt the policy effective immediately. • This is a Trust policy to be implemented by all schools within The Keys Academy Trust to ensure a consistent approach for all.
Version control Version 1: • Reviewed in line with Browne Jacobson policy 2025 Version 2: • Formatted to new TKAT template and reviewed with 2026 Browne Jacobson updates. • Changed policy name to 'Equity' instead of 'Equality'. • Several minor wording changes throughout to provide clarity. • Purpose, Aims and scope clarified. • Roles and Responsibilities clarified. • 6.4 Discrimination arising from disability section added. • 6.6 Sentence added re: TKAT policy reference. • 6.8 Sentence changed for clarity. • 6.11 Paragraph expanded to include staff harassment by third parties. • 7.6 Sentence changed for clarity.

Reviewed by Trust Officer:	Hester Wooller, CEO
Approved by TKAT Trustee Committee:	FAPPP
Trust date of approval:	Autumn 2026
Trust date of next review:	Autumn 2027

TKAT vision

We are a family of distinctive schools at the heart of the diverse communities we serve. In line with our Christian ethos, we aspire to excellent learning and pastoral care for pupils and staff and are committed to being open and welcoming to all.

Key areas of note

Please note the following, which will be applicable throughout the policy:

- Any reference to 'headteacher' should read as whatever title is relevant to the school using the policy (i.e. Executive Headteacher/Head of School or Headteacher). Anything else will be explicitly referenced within the policy.
- Any reference to 'everyone' to staff, trustees, local governors and pupils.
- Any reference to 'we' should be read as The Keys Academy Trust.
- Any reference to 'parents' should be read as 'parents, carers and guardians'.

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Table of Contents

1. Purpose 4
2. Aims 4
3. Scope 5
4. Roles and responsibilities 5
5. Employee network support groups 7
6. Forms of discrimination 7
7. Applying our policy to recruitment and selection 8
8. Applying our policy to training, promotion, pay decisions and conditions of service 9
9. Applying our policy when terminating employment 10
10. Disability discrimination 10
11. Breaches of this policy 10

1. Purpose

1.1 The purpose of this policy is to set out The Keys Academy Trust's (TKAT) commitment to equity/equality, diversity and inclusion within the workplace and to ensuring that all those working for and on behalf of the Trust are treated fairly, with dignity and respect.

1.2 TKAT values the different backgrounds, perspectives, experiences and contributions of its workforce. We seek to create an inclusive working environment in which people are able to contribute fully, make effective use of their skills and develop professionally, without unlawful discrimination, harassment or victimisation.

1.3 TKAT is committed to meeting its obligations under the Equality Act 2010 and other applicable equality legislation. In exercising its functions, the Trust will have due regard to the need to ensure the following:

a) Eliminate discrimination, harassment, victimisation and other conduct prohibited by the Equality Act 2010.
b) Advance equality of opportunity between people who share a relevant protected characteristic and those who do not.
c) Foster good relations between people who share a relevant protected characteristic and those who do not.

1.4 The protected characteristics under the Equality Act 2010 are:

a) Age
b) Disability
c) Gender reassignment
d) Marriage and civil partnership
e) Pregnancy and maternity
f) Race
g) Religion or belief
h) Sex
i) Sexual orientation.

1.5 TKAT's commitment to equity, dignity, respect and inclusion is not limited to circumstances in which a person has a protected characteristic or where the Equality Act 2010 otherwise provides legal protection. We recognise that individuals have a wide range of identities, backgrounds, circumstances and experiences and that these may intersect and affect their experience of the workplace.

2. Aims

2.1 Through this policy, TKAT aims to achieve the following:

a) Provide equality of opportunity and promote equity, diversity and inclusion throughout employment.
b) Prevent and address unlawful discrimination, harassment and victimisation.
c) Ensure that employment decisions are fair, objective and based on relevant criteria.
d) Create an inclusive working environment in which individual differences, backgrounds, experiences and perspectives are respected and valued.
e) Recognise that individuals may experience different or intersecting barriers and take appropriate steps to identify and address disadvantage.
f) Make reasonable adjustments for disabled employees and applicants where required.
g) Promote a culture in which all members of the workforce treat colleagues and others with dignity, fairness and respect.

h) Ensure that recruitment, development, progression and other employment practices support equality of opportunity.
i) Meet the Trust's obligations under the Equality Act 2010, including the Public Sector Equality Duty, and other applicable equality legislation.
j) Publish information demonstrating compliance with the Public Sector Equality Duty at least annually, including relevant workforce information where required, and publish one or more equality objectives at least every four years.
k) Publish gender pay gap information where required by legislation.
l) Monitor and review relevant employment practices and information, where appropriate, to identify inequalities and support continuous improvement.

3. Scope

3.1 This policy applies across TKAT to trustees, governors, employees, workers, agency staff, consultants, contractors, trainees and volunteers, where relevant to their relationship with the Trust. References to 'staff' or the 'workforce' within this policy should be interpreted accordingly.

3.2 The policy applies to all stages and aspects of the employment relationship, including recruitment and selection; terms and conditions; pay and benefits; induction; training and professional development; appraisal; promotion and progression; flexible working; conduct at work; access to opportunities; grievance and disciplinary matters; and the ending of employment. Its principles also apply following employment, including when providing references.

3.3 The Trust Board will oversee progress against the Trust's published equality objectives and ensure that appropriate information is available to demonstrate compliance with the Public Sector Equality Duty.

3.4 The principles of dignity, respect, inclusion and non-discrimination apply to interactions between members of the workforce and with pupils, parents, visitors, contractors, suppliers and other members of the school community.

3.5 This is principally a workforce and employment policy. Equality in relation to pupils, curriculum provision, admissions, accessibility and the delivery of education and other services is addressed through the Trust's other relevant policies and arrangements.

3.6 In applying this policy, TKAT may collect and process personal data, including special category data. Such information will be handled in accordance with applicable data protection legislation and the Trust's data protection and records retention arrangements.

3.7 This policy does not form part of any employee's contract of employment and may be amended by TKAT from time to time.

4. Roles and responsibilities

Trustees

4.1 The Trust Board has overall responsibility for ensuring that TKAT complies with its legal obligations relating to equality, including the Equality Act 2010 and the Public Sector Equality Duty, and for overseeing the effective implementation of this policy.

4.2 The Trust Board will ensure that appropriate arrangements are in place to monitor the Trust's approach to equity, diversity and inclusion and that equality information and objectives are published and reviewed in accordance with statutory requirements.

Local Governing Body (LGB)

4.3 Local Governing Bodies (LGBs) will support the implementation of this policy within their schools and provide appropriate local oversight in accordance with the Trust's Scheme of Delegation.

4.4 LGBs will raise with the Trust any significant equality-related issues or patterns identified through their monitoring and oversight.

Executive and central Trust leadership

4.5 The executive leadership of TKAT, supported by the Central HR team, is responsible for ensuring that appropriate Trust-wide systems, employment practices, guidance and support are in place to implement this policy consistently.

4.6 The Central HR team will provide advice and guidance to leaders and managers on the application of this policy and relevant equality legislation and will support appropriate monitoring and review.

Headteachers

4.7 Headteachers are responsible for the day-to-day implementation of this policy within their schools. They will ensure the following:

a) Promote an inclusive culture in which people are treated fairly, with dignity and respect.
b) Ensure that employment decisions and practices within their responsibility are consistent with this policy.
c) Take appropriate action where concerns about discrimination, harassment or victimisation arise.
d) Ensure that staff understand their responsibilities under this policy.
e) Seek advice from the Central HR team where appropriate.

Leaders and managers

4.8 All leaders and managers are expected to lead by example and promote the principles of equity, diversity and inclusion.

4.9 Those involved in recruitment, selection, appraisal, development, promotion, disciplinary or other employment decisions must apply relevant Trust procedures fairly and objectively and must not unlawfully discriminate.

4.10 Managers should identify and respond appropriately to concerns relating to equality, inclusion, discrimination, harassment or victimisation and seek advice from the Central HR team where necessary.

All staff

4.11 All staff are responsible for the following:

a) Familiarising themselves with and acting in accordance with this policy.
b) Treating colleagues and others with dignity and respect.
c) Not engaging in unlawful discrimination, harassment or victimisation.
d) Supporting an inclusive working environment.
e) Challenging or reporting inappropriate behaviour where it is appropriate and safe to do so.
f) Raising concerns through the appropriate Trust procedures.

4.12 These expectations apply when carrying out work for TKAT, including at work-related meetings, training, trips, events and social activities.

4.13 Staff who require advice about the application of this policy, including those involved in management or recruitment, should contact the Central HR team.

4.14 Staff are encouraged to provide feedback on this policy and may suggest improvements through the appropriate Trust channels.

5. Employee network support groups

5.1 In order to support and encourage staff to value diversity we provide feedback mechanisms focused on a particular aspect of equality, diversity, and inclusion. The primary focus of these mechanismsis to raise awareness, provide support and to encourage knowledge and understanding.

6. Forms of discrimination

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

Direct discrimination

6.2 Direct discrimination occurs where someone is treated less favourably because of one or more of the protected characteristics as set out above. In specific exceptional and limited circumstances, employers can directly discriminate against an individual for a reason related to any of the protected characteristics where there is an occupational requirement. The occupational requirement must be crucial to the post and a proportionate means of achieving a legitimate aim.

Indirect discrimination

6.3 Indirect discrimination occurs where someone is disadvantaged by a provision, criterion or practice that applies to everyone, but puts people with a protected characteristic at a particular disadvantage. Such a requirement will need to be objectively justified.

Discrimination arising from disability

6.4 Discrimination arising from disability occurs where a disabled person is treated unfavourably because of something arising in consequence of their disability, unless the treatment can be shown to be a proportionate means of achieving a legitimate aim. This protection applies where the employer knew, or could reasonably have been expected to know, that the person was disabled.

Harassment

6.5 Harassment related to any of the recognised protected characteristics is prohibited. Harassment is unwanted conduct that has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. Pregnancy and maternity, and marriage and civil partnerships are not protected directly under the harassment provisions. However, pregnancy and maternity harassment would amount to harassment related to sex, and harassment related to civil partnership would amount to harassment related to sexual orientation. Harassment is dealt with further in our anti-bullying and harassment policy and in TKAT Preventing Sexual Harassment at Work Policy.

Sexual harassment

6.6 The law protects employees, workers, contractors, self-employed staff, apprentices, those undertaking vocational training, volunteers, former workers and job applicants from sexual harassment and all schools within TKAT have a duty to take reasonable steps to prevent sexual harassment of its staff at work. Examples of sexual harassment and further details of procedures are noted in our TKAT Preventing Sexual Harassment at Work Policy.

6.7 To report an incident of sexual harassment, to raise a concern or for details of how TKAT responds to a report of sexual harassment, refer to the TKAT Preventing Sexual Harassment at Work Policy.

Victimisation

6.8 Victimisation is the less-favourable treatment of/discrimination of someone who has complained or given information about discrimination or harassment or supported someone else's complaint. This includes where someone mistakenly believes that the victim has complained, given information, or supported someone else's complaint.

Discrimination by association

6.9 Discrimination by association is where an individual is directly discriminated against or harassed for association with another individual who has a protected characteristic.

Discrimination by perception

6.10 Discrimination by perception is where an individual is directly discriminated against or harassed based on a perception that a person has a particular protected characteristic irrespective of whether they do have that protected characteristic (this does not include marriage and civil partnership and pregnancy and maternity).

Third-party harassment

6.11 Third-party harassment occurs where an employee is harassed, and the harassment is related to a protected characteristic (other than marriage and civil partnership, and pregnancy and maternity), by third parties such as parents, clients or customers. TKAT will not tolerate harassment of staff by third parties, including pupils, parents, visitors, contractors, suppliers or members of the public. Concerns about third-party harassment should be reported promptly so that appropriate action can be considered. TKAT will comply with its statutory duties relating to the prevention of sexual harassment, including taking reasonable steps to prevent sexual harassment of staff in the course of their employment.

Part-/fixed-term staff

6.12 Part-time and fixed-term staff should be treated the same as comparable full-time or permanent staff and enjoy no less favourable terms and conditions (on a pro-rata basis where appropriate), unless different treatment is justified.

7. Applying our policy to recruitment and selection

7.1 We aim to ensure that no job applicant suffers discrimination because of any of the protected characteristics. When recruiting or on promotion, we will aim to take steps to improve the diversity of our workforce and provide equality of opportunity where those candidates are the most suitable for the role. Our recruitment procedures are reviewed regularly to ensure that individuals are treated on the basis of their relevant skills and abilities. All applicants will be provided with a copy of our recruitment privacy notice via our recruitment platform, which sets out how we will gather, process and hold personal data of individuals during the recruitment process.

7.2 Job selection criteria, as set out in person specifications, will be regularly reviewed to ensure that they are relevant to the job. Shortlisting of applicants should be done by more than one person wherever possible and will be carried out objectively against the requirements of the job.

7.3 Job advertisements should avoid stereotyping or using wording that may discourage groups with a particular protected characteristic from applying.

7.4 TKAT will take reasonable steps, where appropriate (depending on the situation), to ensure that our vacancies are advertised to a diverse labour market and, where relevant, to particular groups that have been identified as disadvantaged or underrepresented in TKAT. This policy will be made available to applicants upon request.

7.5 Applicants will not be asked about health or disability before a job offer is made, other than where it is necessary to meet one of the following criteria:

a) Establish if an applicant can perform an intrinsic part of the job (subject to any reasonable adjustments).
b) Establish if any reasonable adjustments need to be made to enable an applicant to have a fair interview or assessment.
c) Carry out equal opportunities monitoring (which will not form part of the decision-making process).
d) Job offers will be conditional upon satisfactory verification of the candidate's mental and physical fitness to carry out their work responsibilities, in accordance with Keeping Children Safe in Education and the Education (Health Standards) (England) Regulations 2003.

7.6 Applicants will not be asked about past or current pregnancy or future intentions related to pregnancy, gender identity or history. Applicants will not be asked about matters which may suggest an intention to discriminate on the grounds of a protected characteristic. Applicants will be invited to request that interviewers or staff address them by any name, title or form of address they provide and will always be addressed respectfully by all.

7.7 Schools are required by law to ensure that all employees are entitled to work in the UK. Assumptions about immigration status should not be made based on appearance, name, or apparent nationality. All prospective employees, regardless of nationality, must be able to produce original specified documents before employment starts, to satisfy current immigration legislation. The list of acceptable documents is available from TKAT Central Team's HR department.

7.8 To ensure that this policy operates effectively, and to identify groups that may be underrepresented or disadvantaged in TKAT, we monitor diversity data as part of the recruitment process and as set out in our recruitment privacy notice and data protection policy. Provision of this information is voluntary, and it will not adversely affect an individual's success at recruitment, or any other decision related to their employment. The information is removed from applications before short listing and kept in an anonymised format solely for the purposes stated in this policy. Analysing this data helps us take appropriate steps to avoid discrimination and improve equality and diversity.

8. Applying our policy to training, promotion, pay decisions and conditions of service

8.1 All employees will be given access to a copy of our TKAT staff privacy notice, which sets out how TKAT collects, holds and shares personal data of individuals during their employment.

8.2 Employees' training needs will be identified through the appraisal process. All employees will be given appropriate access to training for their job, and in order to enable them to progress within TKAT.

8.3 Pay and promotion decisions will be based on an employee's performance (where relevant), skills and experience and as detailed in our pay policy.

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

8.5 Relevant national and local conditions of service within TKAT as applied to our employees, will meet the requirements of equal opportunities.

9. Applying our policy when terminating employment

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

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

10. Disability discrimination

10.1 Disability discrimination includes direct or indirect discrimination, any unjustified less favourable treatment because of the effects of a disability, and failure to make reasonable adjustments to alleviate the effects caused by a disability.

10.2 If you are disabled or become disabled, we encourage you to tell us about your condition so that we can support you as appropriate.

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

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

11. Breaches of this policy

11.1 If you believe that you may have been discriminated against, or you have witnessed discrimination, you are encouraged to raise the matter through our grievance procedure (see the Grievance Policy). If you believe that you may have been subject to harassment, you are encouraged to raise the matter through our anti-bullying and harassment policy. If you are uncertain which policy applies or need advice on how to proceed you should speak to TKAT Central Team's HR department.

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

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