



Equality, Diversity and Inclusion Policy

Contents

Policy Statement 2

Appendix 1 - Disability Discrimination Policy 3

Appendix 2 - Equal Opportunity and Discrimination 10

Appendix 3: Accessibility Plan 2020-2023 14

 Accessibility Plan for Curriculum 15

 Accessibility Plan for Improvement of Facilities 16

 Accessibility Plan for Improvement Hampton Pre-Prep & Prep 17

 Accessibility Plan for Admissions 18

Appendix 4 - Dignity at Work Statement 22

Date of review	February 2021	Date ratified by Governors	March 2021
Date of next review	February 2022	Reason for review	New policy (amalgamation of Equal Opportunities, Disability Discrimination, Accessibility Plan and Dignity at Work)

Policy Statement

All schools within the Hampton School Trust ('the School') are committed to encouraging equality, diversity and inclusion, and to eliminating unlawful discrimination within the School community, and its wider community.

The School commits to:

- Promoting equal opportunities and upholding all aspects of the Equality Act 2010.
- Opposing and avoiding all forms of unlawful discrimination, being related to a protected characteristic, which are:
 - age
 - disability
 - gender reassignment
 - marriage and civil partnership
 - pregnancy and maternity
 - race (including colour, nationality, and ethnic or national origin)
 - religion or belief
 - sex, and
 - sexual orientation
- creating an environment free of bullying, harassment, victimisation and unlawful discrimination, promoting dignity and respect for all.
- Maintaining an environment where all staff and pupils are recognised and valued.
- Treating all members of the School community, and its wider community, with dignity, fairness and respect.

The School ensures that it meets its obligations by having appropriate policies in place and taking positive steps to ensure that its policies are known to, and available to, all members of its community. It will further ensure that its policies are working in practice and will review them annually, or sooner should legislation or necessity require any changes, taking action to address any issues.

Appendix 1 - Disability Discrimination Policy

Foreword

The School's Disability Discrimination Policy (the Policy) is written in accordance with the Equality Act 2010 (EA). Reference to a disability in this Policy means a disability as defined by the EA.

The EA protects disabled employees from unlawful discrimination. The EA protects disabled pupils from unlawful discrimination in terms of admission, exclusion, and education and access to associated services, facilities or benefits. In accordance with the EA, the School also considers the needs of disabled members of the wider community who wish to use the School's facilities along with other members of the public. If a member of the School community is disabled, or becomes disabled, they are encouraged to be open and speak either to a member of the Senior Leadership Team (SLT) or to HR so that they can be appropriately supported.

The School will comply with the EA. This policy will be monitored and revised as necessary to comply with current legislation. Any changes will be notified to those concerned.

It is hoped that this policy will be useful to prospective parents and pupils who are considering the School and to current parents of pupils with a disability. The policy aims to give guidance to all members of staff, Governors, visitors and contractors. Any questions regarding this policy should be addressed to The Headmaster. Members of the public wishing to discuss access to the School's facilities are invited to contact the Bursar.

General Background

In accordance with the EA, the School:

- will not unlawfully discriminate against current employees or job applicants because of a disability;
- will make reasonable adjustments to employment arrangements or premises if these substantially disadvantage a disabled person compared to a non-disabled person;
- will not unlawfully discriminate against any pupil or prospective pupils because of a disability;
- will make reasonable adjustments to avoid putting pupils or prospective pupils at a substantial disadvantage because of a disability.

This policy is in place to ensure that:

- compliance procedures are in place, and
- all staff understand the requirements of the EA and its implications in terms of good practice in employment and education.

The School has carried out an initial Accessibility Audit and prepared an Accessibility Plan – see **Appendix 3**. The Accessibility Audit assesses how accessible the School is to disabled pupils and staff, and the wider community, and identifies any ways in which accessibility can be improved. We aim to carry out a rolling programme of improvements, giving priority to the reasonable adjustments identified as being of particular assistance to existing or prospective pupils or staff.

The Governors, Headmaster, Bursar and Staff recognise that it is their legal and moral duty to ensure that the principles of this policy are adhered to. All staff will receive appropriate training and guidance in order to ensure that they comply with this policy and meet their responsibilities. Any breach of this policy will be a serious matter and may be dealt with as a disciplinary issue.

Responsibilities

The Governors

The Governors will provide regular opportunities at their meetings to discuss and review the School's practices and procedures for compliance with the EA and our commitment to equal opportunities.

Specifically, the Governors have a statutory duty to comply with the EA by preparing an Accessibility Plan. The Governors have appointed the Bursar to manage compliance and the Health and Safety Committee to audit relevant School procedures.

The Headmaster

The Headmaster is responsible to the Governors for:

- recommending changes to the Policy in the light of experience or legislation changes
- ensuring the co-operation of all staff at all levels in helping to fulfil this Policy
- ensuring that all Heads of Department fully understand their responsibilities and are given both the time and the encouragement to discharge them
- ensuring that any changes in curriculum and systems of work are considered for their Disability Discrimination implications
- regularly reviewing this policy.

Learning Support

The School's Head of Learning Support monitors the effectiveness of the Policy and reports back to the Headmaster as appropriate.

Heads of Year and Form Tutors

Members of the staff with pastoral responsibilities regularly liaise with the Head of Learning Support to ensure pupils are progressing satisfactorily and to discuss any or potential problems, enabling them to support relevant pupils appropriately.

Heads of Department and Teachers in charge of activities

Heads of Department are responsible to the Headmaster for:

- ensuring that their department is run in accordance with this Policy
- co-operating with the Headmaster to ensure effective communication to enable this Policy to be implemented and monitored
- ensuring that the teachers working under them understand the practical aspects of this Policy and their obligations under it and the EA.

Staff

All staff are responsible for familiarising themselves with this Policy and how it impinges in practical terms on the way that they carry out their work. Staff should also be aware of the consequences of non-compliance with this Policy and will be required to sign a 'read receipt' on Firefly.

Arrangements

Admissions

The School's Admission policies meet all statutory requirements. Applying it means there will be no unlawful discrimination against any child because of a disability in:

- the arrangements the School makes for deciding who is admitted as a pupil;
- as to the terms on which the School offers to admit a person as a pupil;
- not admitting a person as a pupil

Registration

Application for admission to the School is by means of a Registration Form. This form has a section for parents to complete if a child has a disability or significant medical condition. In such cases, the School will send a confidential form to the parents in order that they can inform the School of the nature and effect of any disability. The School can then consider reasonable adjustments for both the admission process and subsequent admission. In assessing any prospective pupil, the School will take advice, and request any assessments, that it feels appropriate.

The School may use anonymised data for statistical purposes at any time.

Entrance Examination and Interview

All boys registered by the relevant deadline are invited to sit an Entrance Examination for Hampton School. If a medical practitioner has recommended that a disabled candidate requires extra time because of a disability, and it a reasonable adjustment, this will be arranged. Additional reasonable adjustments will be made as necessary.

If required, reasonable adjustments will be made to facilitate the second stage of entrance assessment which takes the form of an interview.

Learning Support

A candidate with an Education, Health and Care Plan ("EHCP") is considered on his merits and offered a place if his performance in the entrance assessments suggests that the School would be an appropriate educational environment, taking into account any reasonable adjustments; appropriate learning support is then offered. Local Education Authorities retain an obligation to make and maintain the EHCP, we have no legal obligation to offer a place. The School will liaise with relevant LEAs to seek optimum support for the child.

Suspension, Required Removal, Expulsion and Exclusion

There will be no unlawful consideration of disability when considering any such steps, nor when dealing with a pupil in any disciplinary context.

Premises

The School aims to provide the physical environment and physical aids to access education and employment to ensure compliance with this Policy.

Curriculum

The School offers a broad and balanced curriculum for all pupils and seeks to remove barriers so as to maximise access to the curriculum and availability of subjects, courses, clubs, visits and cultural activities for all pupils.

The School will establish an appropriate educational framework for each pupil who has a disability and/or a statement of special educational needs or EHC plan. The Head of Year, Form Tutor (Pastoral Team), Learning Support Co-ordinator together with the parents (and LEA for EHCP pupils) will monitor and report on the pupil's overall performance and development.

The Learning Support Co-ordinator will draw up an Individual Educational Plan (IEP) for the relevant pupil in conjunction with the Pastoral Team.

Reasonable adjustments will be made to the School's timetabling and classroom allocation to facilitate access to the curriculum.

To accommodate pupil choice, reasonable adjustments may be made to provide a range of recognised sports and games. This is part of the duties of the Pastoral team and others as appropriate in the pre-planning and on-going monitoring of the pupil's progress.

Where appropriate, the School will apply to examination boards for additional time for external examinations and will allow additional time in internal examinations, for example where supported by an educational psychologist's report, a medical practitioner's report or listed in the pupil's SEN statement.

The School has on-site medical facilities for all pupils. The nursing staff will pre-plan the arrival of a new disabled or EHC pupil with the Pastoral Team. This will take into consideration academic, emotional and physical needs.

Disability after Entry to the School

Should their child become disabled after entry to the School, parents should notify the School as soon as possible. This will then enable the School to make reasonable adjustments to help support the child to continue their education and extra-curricular activities. Notification can be made in confidence to the Head of Year or any member of the Senior Leadership Team.

Employment

All staff with a disability are covered by this policy.

The School will not unlawfully discriminate against any prospective employee because of a disability.

Definitions

The EA defines a disabled person as someone who has a physical or mental impairment that has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. An impairment has a long-term effect if it has lasted, or is expected to last, for at least 12 months or for the rest of the life of the person concerned.

This definition may extend to:

- physical or sensory impairments
- mental impairments, including learning disabilities
- progressive conditions where there is or has been some effect and that effect is likely to become substantial in the ordinary course of the condition (such as cancer, multiple sclerosis, muscular dystrophy, and HIV infection)
- severe disfigurements (but not piercings or unremoved tattoos), and people who have had a disability in the past, for example someone in remission from cancer or who has recovered from clinical depression).

There are certain exclusions. These include self-imposed substance addictions/dependency, tendencies to: set fires, steal, be physically, verbally or sexually abusive, exhibitionism, voyeurism.

Recruitment

i. General

The Governors, Headmaster and Bursar will not unlawfully discriminate because of disability in:

- job advertisements
- the application process
- the selection criteria used
- the interview procedure
- the terms of employment offered or
- deliberately not offering a job.

ii. Interviews

Reasonable adjustments will be made so that any applicant with a disability is not substantially advantaged during the interview process.

iii. Existing employees

The School will not unlawfully discriminate against existing employees in any aspect of their employment because of disability, including in:

- terms and conditions of employment
- opportunities for promotion or transfer
- career development or training *or*
- addressing issues of conduct or capability and terminating employment.

If an existing employee becomes disabled or an employee has a disability which worsens, they must notify The Headmaster or Bursar as appropriate so that the School can determine how best to support them and whether any further steps may be required.

Annexe 1– Internal Guidance for the Health and Safety Committee: Disabled Pupils and Staff

Health and Safety of pupils

The safety of pupils is of primary importance.

Should concerns arise over the safety of a pupil(s) as a result of a disabled pupil's involvement in an activity, staff should adhere to the following procedure:

- i. As soon as concerns arise, the member of staff should convene a meeting of all relevant staff – Form Tutor, Head of Year, possibly the Head of Department, and a member of the SLT. Concerns should be discussed and reasonable adjustments be considered in order to facilitate the continuing participation of the pupil.
- ii. Minutes of the meeting will be taken, documenting the concerns and the reasonable adjustments that are proposed.
- iii. A risk assessment will be completed.
- iv. The parents (and pupil, where appropriate) will be informed of the concerns and proposed adjustments. They will receive copies of the minutes and of the risk assessment. Records will be kept on the pupil's personal file of any meetings, or any other communication, that takes place.
- v. Where appropriate, further meetings may be arranged to consider any remaining concerns and further reasonable adjustments. Where appropriate, independent medical opinion should be sought. A School nominated member of staff should then call a meeting with the pupil's parents (and pupil, if appropriate) to discuss the implications of, and reasoning behind, this decision.
- vi. If the parents, or pupil themselves, wish to take the matter further they will be referred to The Headmaster.

If a situation arises where a member of staff considers a pupil (or pupils) to be in immediate danger, they must take appropriate and reasonable preventative action without undue delay.

Reasonable Adjustments

In considering whether or not adjustments are reasonable in order to ensure pupils/staff or prospective pupils/staff are not placed at a substantial disadvantage in comparison with the non-disabled, the School may consider:

- the likely impact of the adjustment
- the practicability of the adjustment
- any existing provision via an EHC plan
- the interests of other pupils/staff
- the impact upon the services we provide
- financial resources

Management Responsibilities

The Governors have appointed the Bursar to manage compliance and the Health and Safety Committee to audit relevant School procedures.

Accessibility Audit

The School has carried out an Accessibility Audit with a view to improving both physical access and access to the curriculum, as set out in the current three-year Accessibility Plan.

The Accessibility Plan assessed the following provisions and facilities:

- entrances & exits
- external pathways
- handrails
- wheelchair access around site
- staircases
- minibuses
- medical support services
- use of IT facilities to assist learning (laptops/spellcheckers)
- audio loops
- staff training and awareness
- toilet and sanitary fittings (handles, levers, locks)

Monitoring Arrangements

General

The Schools' Health and Safety Committees will monitor and review this Policy to and report its findings to the Governors. Any breaches in the Policy implementation will be addressed immediately.

Audits

The Health & Safety Advisor (Facilities Manager) will arrange randomly chosen audits to monitor the various aspects of this Policy to ensure that it is being implemented in the School by all those with EA responsibilities. The School will be expected to address any deficiencies in the Policy implementation immediately.

References

Equality Act 2010 (EA) <http://www.legislation.gov.uk/ukpga/2010/15/enacted>

Department for Education - Code of Practice on Special Educational Needs and Special

Educational Needs and Disability Code of Practice: 0 to 25 years.

Appendix 2 - Equal Opportunity and Discrimination

A. Introduction

The School is committed to equality of opportunity for all staff and pupils.

- The School is totally committed to avoiding all forms of unlawful discrimination as set out in the Equality Act 2010. All transgressions against the School policy will be treated very seriously.
- This policy covers discrimination of and by employees, and all other members of the School community, including job applicants, relating to the following protected characteristics: age, disability, race (which includes nationality, colour and ethnic origin), religion or philosophical belief, sex, sexual orientation, gender reassignment, pregnancy/maternity and marriage and civil partnership.
- Discrimination includes:
 - Direct discrimination – that is treating someone less favourably because of a protected characteristic (which includes a perception that they have a protected characteristic and their associating with someone who has a protected characteristic).
 - Indirect discrimination – that is having a provision, criterion or practice that applies to everyone but adversely affects people with a protected characteristic more than others (and is not objectively justifiable)
 - Harassment – that is unwanted conduct relating to a protected characteristic that has the purpose or effect of violating another’s dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment
 - Victimisation – that is treating someone less favourably because they have raised concerns (or supported someone else’s complaint) about discrimination or harassment.
 - If an employee believes that any employee or applicant may have been subjected to treatment contrary to this policy, they should report it without delay to their own line manager or a member of the Senior Leadership Team (SLT). If an employee believes that a pupil may have been subjected to treatment contrary to the *Equal Opportunities Policy for Pupils* they should report it without delay to their own line manager or a member of the SLT. If an applicant believes that they have been subjected to treatment contrary to this policy, they should report it without delay to hr@hamptonschool.org.uk or bursar@hamptonschool.org.uk.

This policy should be read in conjunction with the following policies:

- Anti-bullying*
- Admissions*
- Dignity at Work statement (**Appendix 4 of this policy**)
- Behaviour, Rewards, Sanctions, Discipline and Exclusions Policy (Hampton School)
- Policy to Promote Good Behaviour – Rewards – Sanctions- Exclusions (Hampton Pre-Prep & Prep)
- E-Safety Policy, and
- PHSE schemes of work

(* Denotes there are separate policies for each school within the Trust)

B. Employment

1. The School is an Equal Opportunities Employer

- In order to promote an environment within which the School can call upon the widest possible range of knowledge, skill and experience, as well as ensuring compliance with the relevant legislation and codes of practice, we are committed to achieving and maintaining a workforce which represents the population within our recruitment area in terms of race, religion, marriage and civil partnership, sex, sexual orientation, gender reassignment, age and disability.
- To this end, the School shall regularly review working conditions and practices to ensure that no applicant for employment or member of staff is disadvantaged by conditions or requirements which cannot be shown to be justifiable. Should an employee raise concerns about discrimination with their line manager or under the grievance policy, the following steps will normally be taken – see **Appendix 4**:
 - The matter will be formally investigated by a senior member of staff.
 - The perpetrator of any proven instance of unlawful discrimination will, if an employee, be subject to disciplinary action and may be dismissed. If not an employee, but works for the School in another capacity, their engagement may be ended.
 - The SLT will discuss and disseminate any learning points.
 - It is important to raise these issues immediately as a late complaint makes it more difficult to establish the facts of the case.

2. Recruitment and Selection

The staff selection process is governed by the School's principles of non-discrimination and is designed to achieve the best match between, on the one hand, the individual's knowledge and skills, experience and character and, on the other hand, the requirements of the vacant post, recognising the need for the flexibility to respond to changing conditions.

The School is committed to the following during the recruitment process:

- The capability of the individual to perform in the position will be the major selection criterion, but the ability both to work with others and to be trained, coupled with individual potential will be taken into account.
- All applicants will be dealt with courteously and as expeditiously as possible.
- Carefully selected and validated skills and/or psychometric tests may be used as part of the selection process and will be administered by a trained tester.

Job applicants should not be asked questions which might suggest an intention to unlawfully discriminate.

The School will make any appropriate reasonable adjustments for disabled candidates who would otherwise be substantially disadvantaged by arrangements during the application process.

3. Training and Development

Structured training and development at all levels (academic and support staff) within the School is essential to the efficient and effective operation of the School's services and the development of the individual.

The School aims to ensure that all employees have the knowledge, skills and experience to meet satisfactorily the required standards of job performance. In order to meet these requirements, the School will provide appropriate access to training opportunities. The objectives of the School's training and development strategy are:

- To provide an effective induction programme for each individual, ensuring an understanding of the School, department and the individual's duties and responsibilities. This will include training/ instruction on health and safety and any legal requirements associated with their job, such as may arise through the charitable status of the School.

- To provide introductory and 'on the job' training to enable new employees to reach the required performance standard.
- To identify the current and future training needs of individuals and match these to cost-effective training programmes.
- To provide training to ensure improvements in skills, knowledge and attitude.
- To encourage and support employees to undertake further study in areas which are of benefit to themselves and their role in the School.
- To include all staff within the School's formal Review and Development process.

4. Disability

Staff should refer to refer to **Appendix 1** – Disability Discrimination

5. Employee Relations

The School places great value on good working relationships between employer and employee and between employees. Efforts are continuously directed towards maintaining a constructive relationship and finding mutually acceptable solutions to workplace problems and issues. To this end, the School aims to:

- achieve high performance standards by encouraging employee commitment and teamwork, and promoting an attitude of trust
- maintain a work environment in which the personal dignity of each individual is respected and unlawful discrimination and harassment are not tolerated
- provide employment conditions which are competitive
- communicate regularly with employees about the School's objectives, achievements and significant developments
- recognise the right of every employee to raise a complaint, to appeal against a decision and to receive a response within a reasonable time.

The School does not currently recognise any trade union as having representative rights and relies upon the existing management structure for communication between employee and employer.

The School is eager to encourage a policy of non-discrimination and equal opportunity and shall use its reasonable endeavours to ensure that the recruitment and treatment of both staff and pupils accords with such policies.

C. Pastoral Care, Discipline and Staff Expectations

The pastoral system has an essential role to play in promoting this policy of equal opportunities and in countering prejudice, including racial and sexual prejudice. Form Tutors are reminded that they are responsible for explaining, clarifying and exemplifying the policy and for transmitting and reinforcing the values and attitudes enshrined within it. The Form Tutor Group (and Form Teachers in Hampton Pre-Prep and Prep) should provide opportunities to raise awareness of and discuss gender issues and cultural diversity, either informally or more formally through Personal, Health and Social Education (PHSE) lessons and materials. The example set by staff both in terms of behaviour and expectations should reflect the aims and ethos of this policy.

D. Sexual Harassment

Sexual harassment is unwanted behaviour of a sexual nature. It can happen to men, women and people of any gender or sexual orientation. It can be carried out by anyone of the same sex, opposite sex or anyone of any gender identity.

Employees or workers could experience sexual harassment from anyone they come into contact with because of their job, including:

- someone they work with
- a customer, contractor, client or member of the public
- a manager, supervisor or someone else in a position of authority
- someone high profile or influential.

It can still count as sexual harassment even if the person did not mean it to be. The effect of the behaviour is what matters. In all cases, complaints will be treated in a serious and sympathetic manner.

It is the School's responsibility to ensure that there is a sufficiently supportive and positive climate to enable any member of staff or pupil who feels that they are the victim of sexual harassment to feel confident to inform their Line Manager, HR or a member of the SLT in the knowledge that the matter will be investigated thoroughly.

Members of staff failing to comply with this policy are subject to normal disciplinary procedures.

E. Racist Behaviour

Insulting behaviour towards a member of staff or pupil by an individual or group on grounds of their colour, nationality and ethnic or national origins is unacceptable. It may take a variety of forms:

- racist jokes, gestures or derogatory comments
- graffiti or caricatures
- social isolation or segregation
- provocative behaviour, e.g. the wearing of badges, the introduction of racist literature into school
- threats of intimidation
- physical contact or assault

It is the School's responsibility to ensure that there is a sufficiently supportive and positive climate to enable any member of staff who feels that they are the victim of racist behaviour to feel confident to inform their line manager or a member of the SLT in the knowledge that the matter will be investigated thoroughly. Pupils are encouraged to speak to their Form Tutor, or any other member of staff, if they experience any form of racist behaviour or are aware that such behaviour is being perpetrated.

Staff can refer to the Dignity at Work statement (**Appendix 4**).

Members of staff failing to comply with this policy are subject to normal disciplinary procedures.

Appendix 3: Accessibility Plan 2020-2023

This document should be read in conjunction with the **Special Educational Needs and Disabilities, including Pupils with Education Health Care Plans (EHCPs) Policy**.

Hampton School is committed to increasing the access for pupils with Special Educational Needs and Disabilities (SEND). Our Accessibility Plan encompasses the Equality Act 2010, to ensure:

- (a) Increasing the extent to which disabled pupils can participate in the school's curriculum,
- (b) Improving the physical environment of the school, for the purpose of increasing the extent to which disabled pupils are able to take advantage of education and benefits, facilities or services provided or offered by the school, and;
- (c) Improving the delivery to disabled pupils of information which is readily accessible to pupils who are not disabled.

Accessibility Plan for Curriculum

Target	Strategy	Resources	Intermediate 1-3 years	Long term 3 years +
<p>To enhance the implementation of the SEND Code of Practice 2014, across the school.</p> <p>Heads of Department audit their subjects each year.</p>	<p>Hampton School offers high quality, personalised teaching that increases the extent to which pupils with SEND or a medical condition can participate more.</p> <p>Adapt teaching to match the learning needs of the pupils with SEND e.g. more targeted, differentiated teaching, which creates opportunities to use a multi-sensory approach to learning experiences.</p>	<p>Pupils with a new diagnosis have a Pupil Profile, which is easily accessible on SIMS, and suggests strategies for teachers.</p> <p>Curriculum Reps. will liaise with the Learning Support Department to develop appropriate resources, and provide evidence for Access Arrangements.</p> <p>Costs for reasonable adjustments will vary across the curriculum.</p>	<p>2020: Include greater differentiation in planning lessons, and review existing schemes of work to foster wider participation.</p> <p>2020-: Head of Departments to encourage an inclusive classroom and range of teaching styles, in adherence with the Teaching Standards.</p> <p>2020: Maintain a multi-sensory approach to teaching and learning. Build in greater opportunities for pupil feedback, to shape and inform future planning.</p>	<p>Use pupil and parent feedback to evaluate the impact of additional personalised teaching and learning experiences.</p>
<p>In line with the LDD and SEND Policy, monitor the progress of pupils with SEND.</p>	<p>Teachers have a greater focus on particular areas of development for pupils with SEND.</p> <p>Each curriculum subject area develops their planning, teaching and self-reviewing tools; to enhance the progress made by pupils SEND.</p>	<p>Detailed monitoring and tracking systems to review the progress made by pupils with SEND.</p> <p>New analysis reports on SIMS to inform Heads of Departments and SLT. Ensure that Access Arrangements are recognised in attainment.</p>	<p>2020-2021: Simple, clear steps are shared with the pupils to illustrate and demonstrate how to improve.</p> <p>2021-2022: develop long term tracking to record progress.</p> <p>2022-2023: review-tracking procedures.</p>	<p>A working document which can be constantly refined and amended.</p>

Accessibility Plan for Improvement of Facilities

Objective	Action	Desired Outcome	Timescale	Goal Achieved
Changing rooms have coat hooks at two heights.	The School Maintenance department to review all changing rooms and ensure there are coat hooks at two heights.	To ensure the changing rooms can be utilised by students with disabilities.	September 2021	(Date)
Ensure regular visitors to the building with a particular egress have a Personal Emergency Egress Plan (PEEP) drawn up to assist with safe emergency egress	Staff to notify the Facilities Manager of any regular visitor or pupil with egress issues. The Facilities Manager will then prepare a PEEP for the individual.	To ensure that all individuals can safely evacuate the building in an emergency	Ongoing	Ongoing
Ensure where possible hands can be washed whilst seated on the WC.	The School's plumbing contractors to reposition all identified sinks where possible to allow access to students with disability	To ensure that disabled people can wash their hand from a safe seated position.		September 2020
Ensure ease of access to Reception	Main door to be changed as it is badly fitting and either a sliding door mechanism, or an appropriately placed power button to be installed to allow ease of access.	Easy accessibility for any disabled staff/pupils/visitors.	September 2021	(Date)
Ensure ease of access to the School building via an alternative entrance	A ramp and an appropriately placed power button to be fitted outside the entrance at the front of the building which leads to the Maths department	Easy accessibility for wheelchair users (and deliveries).	September 2021	(Date)
Ensure any disabled visitors are able to communicate with staff and gain admittance	Appropriately placed entrance intercoms to be placed on all entrances to the building, including entrance gates.	Easy communication with School staff for disabled staff/pupils/visitors to allow access	September 2021	(Date)
Assist disabled staff/pupils/visitors to evacuate the Hammond Theatre	Install an evacuation chair on the upper floor of the Hammond Theatre.	Assist in the evacuation of disabled staff/pupils/visitors from the upper floor of the Hammond Theatre	September 2021	(Date)

Accessibility Plan for Improvement Hampton Pre-Prep & Prep

Objective	Action	Desired Outcome	Timescale	Goal Achieved
Ensure signage around the School is easy to read and where required there is directional signage.	<p>Review current signage throughout the site</p> <p>Discuss and agree the requirements for signage at Prep SLT</p> <p>Install signage</p>	Clear signage throughout	<p>February 2021</p> <p>May 2021</p> <p>September 2021</p>	
Review the steps around the building to ensure that there is sufficient contrast on the step nosings.	Highlight all the outside steps with anti-slip yellow paint	All outside steps are well visible	May 2021	
Vision panels to be fitted in all classrooms and office doors that currently do not have vision panels fitted.	<p>Review current situation</p> <p>Where necessary replace the doors with the vision panel ones. Ensure correct fire rated glass is used</p>	All classrooms and office doors are fitted with the fire rated vision panels	September 2022	
Adequate outside lighting	<p>Review current situation</p> <p>Improve lighting where necessary to ensure outside areas are well lit, particularly pathways, steps and entrances</p>	Well-lit pathways, steps and entrances	September 2021	
Provide the induction loop facility	<p>Purchase portable induction loop device</p> <p>Train front offices staff on how to use it</p> <p>Install relevant signage</p>	Induction loop facility is available for pupils, staff and visitors	<p>January 2021</p> <p>February 2021</p>	

Accessibility Plan for Admissions

The School is inclusive and welcomes applicants with SEND, promoting a positive culture towards their inclusion and it will not treat such applicants less favourably on these grounds. The School will comply with its legal and moral and responsibilities under the *Equality Act 2010* and the *Special Educational Needs and Disability Act 2001* in order to accommodate the needs of applicants who have disabilities or needs for which, with reasonable adjustments, the School can cater adequately.

The School must be made aware of any known disability or special educational need which may affect a child's ability to participate in the admissions procedure or take full advantage of the education provided at the School. Parents or guardians of an applicant who has any disability or special educational needs will be required to disclose full written details during the admissions process. Full details and copies of any relevant supporting documentation is requested at the time of registration and must be provided to The Headmaster at least six weeks before attending an entrance examination at the School. Additional information may be requested.

The School needs this information so that, in the case of any applicant with particular needs, staff can assess those needs and make sure the School can provide adequately for them throughout the admission process. The School needs this information so that, in the case of any applicant with particular needs, staff can assess those needs and make sure the School can provide adequately for them throughout the admissions process, including any interviews or attendance at the School during the assessment process at HPP&P, for example, 7+ and Kindergarten Play Visits.

The School will consult with parents or guardians about the adjustments which can reasonably be made for the applicant both during the admission process and later as a pupil should the offer of a place be made.

The School will make reasonable adjustments to ensure that the information and application procedure is accessible for disabled applicants. Similarly, if special educational needs or a disability become apparent after a place at the School has been accepted, the School will consult with the parents about reasonable adjustments which can be made in order to allow the pupil to continue at the School. Where there is a material failure to disclose a special educational need or disability before a place at the School has been offered, the School reserves the right to withdraw the offer of a place.

Objective	Action	Outcome	Timescale	Goal Achieved
<p>To continue to improve methods of gathering information about a prospective pupil's disability or special educational need at the beginning of the Admissions process to ensure a smooth transition for all applicants</p>	<p>Provide additional telephone support to complete on forms when required and consider further adaptations of registration and other admissions forms as appropriate e.g. larger print, braille, translation into other languages, production of audio tape.</p> <p>To use the OpenApply (online admissions system) Review & Tasks features to streamline the process for the Admissions Office and Learning Support team</p>	<p>Wider level of support provided to facilitate access to the admissions process</p>	<p>Ongoing</p>	
<p>To improve communication for EAL (English as a foreign language) families</p>	<p>Production of a fee assistance leaflet in different languages and translation of the School's Terms & Conditions (T&C's) into other languages on request</p> <p>Highlight availability of this service in current information for prospective parents and on the School website</p>	<p>Improved access to key information for families whose first language is not English</p>	<p>Fee assistance September 2020</p>	
<p>To meet SEND for all applicants and improve liaison with parents and feeder schools</p>	<p>Close liaison with Learning Support Department regarding access arrangements for entrance assessments</p> <p>Employment of Learning Support staff equivalent to one day per week to improve communication links</p>	<p>Every applicant has their individual SEND met</p> <p>Individual access arrangements provided for 2020 admissions round</p> <p>All individual needs are met</p>	<p>Ongoing</p> <p>Ongoing as required Nov 2020 & Jan 2021</p>	

Objective	Action	Outcome	Timescale	Goal Achieved
<p>To meet SEND for all applicants and improve liaison with parents and feeder schools (cont.).</p>	<p>Liaison with feeder schools (nurseries in the case of Pre-Prep) (Heads, class teachers and SENCOs) to establish needs and history of provision</p> <p>Ensure reasonable adjustments are put in place for visually impaired candidates e.g. larger font/modified papers, additional time, one-to-one invigilation</p> <p>Visit current schools to meet with the Head of Learning Support (SENCo) to assist with adjustments and transition prior to candidate entry to the School.</p> <p>Arrange use of laptop, extra time, readers, prompters, one-to-one invigilation as required</p>	<p>All necessary requirements in place for candidates</p> <p>Head of Learning Support to visit current schools ensuring smooth transition for candidates</p> <p>At Pre-Prep, Home Visits programme for Kindergarten as well as attendance at the LBRuT Transition event. At Prep, DHP, DHA & Year 3 Form Teachers to visit pupils in their current school to ensure a smooth transition)</p>	<p>Completed for 2020 admissions round and ongoing as required</p> <p>Sept – March (2020-2021)</p> <p>Summer term (2021-2022)</p>	
<p>To ensure that overseas applicants have access to the admissions process</p>	<p>Liaison with current schools to allow participation in entrance assessments.</p> <p>Conduct admissions interviews via Skype. Employ translators when needed.</p>	<p>Geographical & language barriers removed</p> <p>Overseas candidates interviewed via Skype.</p>	<p>Sept. – March (2020-2021)</p>	

Objective	Action	Outcome	Timescale	Goal Achieved
<p>Improve communications with feeder schools to ensure information shared throughout the admissions process</p>	<p>Visit feeder nurseries, primary and prep schools prior to pupil admission</p> <p>Implementation of pre-admissions transition programme for pupils where appropriate including taster mornings, parent meetings, online Joiners' Programme</p> <p>Biennial meeting and lunch with feeder school SENCOs to allow sharing of information and provide guidance on data required.</p>		<p>Summer term (2021-2022)</p> <p>As required</p> <p>October 2021</p>	
<p>Annual review of Admissions Policy and Admissions process</p>	<p>Annual Governor audit</p> <p>Annual Admissions review with SLT</p>		<p>Autumn Term (annually)</p> <p>June (annually)</p>	
<p>Annual review with Learning Support Department to evaluate how data informs entry decisions and implications for future support needs</p>	<p>Annual review with Head of Learning Support</p>	<p>Greater understanding of scores considered in decision making process</p>	<p>June (annually)</p>	

Appendix 4 - Dignity at Work Statement

1. Statement of principles

- This policy relates to all schools within the Hampton School Trust ('the School').
- All members of staff and all pupils have a right to be treated with dignity and respect.
- Harassment, bullying and victimisation are totally unacceptable.
- No member of the School community should have to tolerate harassment, bullying or victimisation from other members of staff, pupils, members of the public or other individuals they may encounter at work, in School or on school trips.
- The School will comply with its obligations under relevant legislation and guidance
- The School strives for an environment which is free of harassment, bullying and victimisation through:
 - Raising awareness of the issues of harassment, bullying and victimisation, and refusing to tolerate these behaviours
 - Supporting any member of staff, or pupil, who is harassed, bullied or victimised
 - Dealing with any issues through agreed processes
 - Ensuring that all staff are aware of, and adhere to, the Staff Behaviour Policy
 - Ensuring that pupils are aware of guidance included in the Code of Conduct.

2. Who does this statement apply to?

This statement is designed to protect all current and past members of staff and pupils as well as:

- Apprentices
- Casual workers (zero-hours workers)
- Consultants
- Contractors
- Interns
- Job seekers and job applicants
- School Counsellors
- VMTs
- Volunteers, including Governors

This statement is not contractually binding upon the School and may be amended at any time.

3. Definitions

This section outlines the definitions of harassment and victimisation in the Equality Act 2010 and gives an indicative definition of bullying. However, if a member of staff, or a pupil, reports that they are being bullied, harassed or victimised, then the School may still consider and act on their complaint, regardless of whether or not it accords with the definitions below.

For the purposes of this statement, any reference to the workplace will be deemed to include any place where an activity relating to the School takes place, activity on the School's systems and contact with any members of the School community for School purposes, including School-related social events.

3.1 Harassment

Harassment, as defined in the Equality Act 2010, is:

Unwanted conduct related to a relevant 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 unwanted conduct may be physical, verbal or non-verbal. A single incident can amount to harassment.

The relevant protected characteristics defined in the Equality Act 2010 are:

- Age
- Disability
- Gender reassignment
- Race
- Religion or belief
- Sex
- Sexual orientation

The individual making the complaint does not need to be the intended target or possess the relevant characteristic themselves.

An individual may find the behaviour offensive even if it is not directed at them, or they may be:

- Associated with a person who has a protected characteristic
- Wrongly perceived to have a protected characteristic
- Treated as if as if they have a protected characteristic

Harassment may also involve unwanted conduct of a sexual nature which has the same purpose or effect on the individual as described at the beginning of this section (3.1).

Harassment may also occur where there is unwanted conduct of a sexual nature or that relates to gender reassignment or sex. This conduct has the same purpose or effect described at the beginning of this section (3.1) and the individual is treated less favourably because they rejected or submitted to it.

3.2 Bullying

Bullying in the workplace may be characterised as:

Offensive, intimidating, malicious or insulting behaviour involving an abuse or misuse of power through means that undermine, humiliate, denigrate or injure the recipient.

Bullying can take the form of physical, verbal and non-verbal conduct.

The words 'bullying' and 'harassment' are often used interchangeably in the workplace. The impact on the individual can be the same as harassment.

3.3 Victimisation

Victimisation is defined in the Equality Act 2010 as:

Subjecting an individual to a detriment because he/she does a protected act, or it is believed he/she has done or may do a protected act.

A 'protected act' is:

- Bringing proceedings under the Equality Act 2010

- Giving evidence or information in connection with proceedings under the Act
- Doing any other thing for the purposes of or in connection with the Act
- Alleging that someone has breached the Act

4. Examples of unacceptable behaviour

Unacceptable behaviour in this School may include:

- Insulting someone verbally or through offensive behaviour
- Physical or psychological threats
- Spreading malicious rumours
- Sharing information about an individual with others who do not need to know
- Ridiculing or demeaning someone
- Picking on someone or setting them up to fail
- Exclusion
- Misuse of power, such as overbearing supervision or deliberately undermining a competent worker
- Unwelcome sexual advances, such as touching, standing too close, displaying offensive materials, asking for sexual favours, making decisions on the basis of sexual advances being accepted or rejected
- Making unfounded threats or comments about job security
- Preventing an individual from progressing by intentionally blocking promotion or training opportunities

This list is not intended to be exhaustive.

Harassment, bullying or victimisation may occur:

- Face to face
- Through written communications
- Using visual images (for example, pictures of a sexual nature or embarrassing photographs of colleagues)
- Via email or social media
- Via phone
- Via automatic supervision methods, such as computer recording of downtime from work, or recording of telephone conversations, if these are not universally applied to all workers in similar roles

This list is not intended to be exhaustive.

5. Reasonable management

The School differentiates between reasonable management, which may be firm but will be fair, and behaviours associated with harassment, bullying or victimisation.

Legitimate, justifiable, appropriately conducted monitoring of the behaviour or job performance of a member of staff, or the behaviour of a pupil, does not constitute bullying, harassment or victimisation.

6. Roles and responsibilities

6.1 The School Governors

The Governors:

- Hold the Headmaster to account for the implementation of this policy
- Ensure that this policy is periodically reviewed and kept up to date
- Deal with complaints raised by or about the headteachers

6.2 The Headmaster

The Headmaster seeks to ensure that the working environment is free from harassment, bullying and victimisation by creating a culture where staff feel able to raise concerns and know that they will be taken seriously, without any fear of reprisals. The Headmaster also:

- Oversees the Complaints Log.
- Ensures all staff receive appropriate training.
- Ensures that the School's policies are maintained and continue to be relevant.
- Ensures that the School's pupils are aware of the guidelines and procedures available to them and as outlined in the School Code of Conduct – 'Where to go if you have a concern or need help'. The Headmaster and Deputy Head of Hampton Pre-Prep and Prep reinforce the principles of their policy To Promote Good Behaviour.

6.3 All members of staff

All members of staff should:

- Treat colleagues with dignity and respect
- Contribute to maintaining an environment free from harassment, bullying and victimisation
- Support colleagues who experience unacceptable behaviour and who are considering making a complaint, or have made a complaint
- Report any occurrence of unacceptable behaviour and offer supporting evidence if any formal investigation ensues.

6.4 Line Managers

Line Managers, and those fulfilling this role when a complaint is about the line manager:

- Will listen to and take seriously any member of the school workforce who comes to them with a concern or complaint regarding harassment, bullying or victimisation
- Follow the process in all cases reported to them

7. What to do if you are being harassed or bullied – informal steps

Members of staff, or any other member of the School community who feels they are being bullied or victimised by somebody in that community, may first raise their concern with the person responsible informally and should speak to their line manager or HR. This will be considered to be the informal stage of the complaints process.

If the subject of a complaint is a line manager, staff should speak to a member of SLT (Support Staff should contact the Bursar).

If the subject of a complaint is The Headmaster, staff should contact the Chair of Governors via the Clerk to the Governors (the Bursar).

If the subject of a complaint is a School Governor, staff should contact The Headmaster.

Raising the matter informally will usually involve a discussion of the concerns, with the intention of finding a resolution and ensuring that any harassing, bullying or victimising behaviour will cease with immediate effect. If, however, a resolution is not reached, staff should refer to process as outlined below under '8'.

8. Formal complaints

The School will use this process if the complaint relates to someone employed or engaged directly by the School, or where the School has the power to take professional or disciplinary action, or in other circumstances where the School deems it appropriate (in its sole discretion).

8.1 Submitting a formal complaint

Where there has been no resolution at the informal stage (see 'What to do' – above), a complaint will progress to the formal stage and the process as outlined in the relevant Grievance Procedure (A12 Grievance Procedure for Support Staff; A13 Grievance Procedure for Teaching staff) which can be found on Firefly.

8.2 Formal investigation

Once a written complaint is received, the following process will be followed:

If the matter is not resolved with the Line Manager, it should be raised, in writing, with the Headmaster who will then arrange a meeting to explore possible resolutions. At this meeting, the member of staff may be accompanied by a colleague or by an appropriate official of a trade union. The Headmaster may also discuss the matter with the relevant Line Manager or other members of staff who may be in a position to help. Having completed these meetings, the Headmaster will endeavour to communicate his decision, in writing, within seven working days.

Where a grievance relates to dissatisfaction with the Headmaster, the matter should be raised in writing with The Clerk to the Governors, for the attention of The Chairman of the Board of Governors. The Chairman of the Board of Governors will appoint a single Governor (substituting for the Headmaster) to explore possible solutions.

A meeting between the investigating officer and the complainant will usually be arranged within one week of receipt of the complaint. A meeting between the investigating officer and subject of the complaint will then take place; the subject will be allowed the opportunity to respond to the complaint. There is no entitlement for the subject of the complaint to see the written complaint, but they should be provided with information as to the nature of it. Notes of both meetings will be made and placed on the investigation file.

Both the complainant and the subject of the complaint may be accompanied at any stage of the formal procedure by either a colleague, a trade union official, or a trade union representative who has been certified by their union as competent to accompany a worker.

If any other witnesses are deemed pertinent to the investigation, the investigating officer will arrange to meet with them, taking notes of any discussions and placing these on the investigation file. The investigating officer will review relevant information and documentation provided by the witnesses.

8.3 Action following the investigation

If the investigating officer upholds the complaint against the employee, possible outcomes may be:

- Disciplinary action
- Mediation
- Mandatory training

If the investigating officer does not uphold the complaint, possible outcomes may be:

- No action
- Mediation

These lists are not intended to be exhaustive.

8.4 Alleged harassment, bullying or victimisation by stakeholders

The School will use this process if the complaint relates to someone not employed directly by the School, or when the school doesn't have the power to take any professional or disciplinary action against the person in question.

Where the decision has been reached for the complaint to be dealt with under this Dignity at Work policy, the matter will be handled in line with the above outlined formal procedure – namely the requirement for a formal written complaint to be submitted and a formal investigation to commence. It may be appropriate to allow the stakeholder to be accompanied as part of any investigation interview.

If the allegation is found to be justified, the response from the School will depend on the relationship of the perpetrator to the school and the nature and severity of the incident.

The School will take proportionate action in consultation with the individual who made the complaint. This may involve:

- Mediation
- A verbal warning
- A written warning
- Termination of the relationship with the School
- Temporary or permanent ban from School premises (in which case the School will refer to the Department for Education's guidance on controlling access to school premises)

This list is not intended to be exhaustive.

8.5 Alleged harassment, bullying or victimisation by pupils

Where the decision has been reached for the complaint to be dealt with under this Dignity at Work policy, the matter will be handled in line with the above outlined formal procedure – namely the requirement for a formal written complaint to be submitted and a formal investigation to commence. It may be appropriate to allow the pupil to be accompanied by an appropriate adult as part of any investigation meeting.

If the allegation is found to be justified, the school will then refer to the Behaviour, Rewards, Sanctions & Discipline Policy, and may issue a disciplinary sanction against the pupil in accordance with that policy (up to and including permanent exclusion where appropriate), with reference to the Safeguarding Policy if appropriate to the pupil's circumstances.

Where the pupil remains at the school, the School will also take responsibility for educating the pupil about appropriate behaviour and will liaise with the individual who raised the allegation about alternative working arrangements (temporary or permanent) if they teach, or otherwise have regular interaction with, the pupil.

8.6 Continued working relationships and interim precautions

Where a complaint has been raised and is being investigated under this procedure, the School will consider requests from the complainant to change their working arrangements, duties or hours in order to avoid or minimise contact with the alleged perpetrator, where reasonably practical, until a successful resolution and an agreed outcome are reached.

Where a complaint is raised about an employee, the School may consider suspending the employee on full pay or making other temporary changes to working arrangements pending the outcome of the investigation, if circumstances require.

Where a complaint is raised about someone other than an employee, such as a customer, supplier or visitor, the School will consider what action may be appropriate to protect the complainant and anyone involved pending the outcome of the investigation, bearing in mind the reasonable needs of the School and the rights of that person. Where appropriate, the School will attempt to discuss the matter with the third party.

Whatever the outcome, we will consider how to support the individuals involved to maintain an ongoing working relationship, and provide appropriate support.

8.7 Malicious complaints

We will also consider whether there is evidence that the complaint has been malicious. If there is evidence to suggest that the complaint was malicious, this will be investigated and dealt with under our disciplinary procedures. Where the individual isn't covered by our disciplinary procedures, the School will consider other reasonable action, and involve other agencies where appropriate.

8.8 Appeals

If either a member of staff is dis-satisfied with the outcome of the procedure, they may have the right to appeal, according to the relevant Appeal Procedure for either Support Staff or Teaching Staff - [School Policies - click here](#) :

The School reserves the right to follow a similar procedure to that of the Support Staff Appeal Procedure in all other circumstances.

9. Confidentiality

The School will respect confidentiality for all parties concerned in any complaint under this policy but there may be circumstances in which it is necessary, reasonable or appropriate to share information. Relevant documents will appear in either an employee's personal file or a pupil's file, as appropriate. Breach of confidentiality may give rise to disciplinary action under the school's Disciplinary Procedure.

Information will be processed in line with data protection law and will be kept securely in accordance with the law and the School's Privacy Notice and Records Management Policy - [School Policies - click here](#)

Further information is available from the Bursar, HR department or via data@hamptonschool.org.uk.

10. Monitoring arrangements

This policy will be reviewed at least annually and should be read in conjunction with the following policies:

- Appeal Procedure – Support Staff
- Appeal Procedure – Teaching Staff
- Behaviour, Rewards, Sanctions & Discipline Policy (*)
- Grievance Procedure – Support Staff
- Grievance Procedure – Teaching Staff
- Peer on Peer Abuse
- Privacy Notice
- Pupil Code of Conduct (*)
- Records Management Policy
- Safeguarding (Child Protection) Policy
- Staff Behaviour Policy
- Termly calendar (given to all pupils)
- Whistleblowing Policy

(*denotes each school within the Trust has its own policy)