

Employee Equality and Diversity Policy

AREA:	PEOPLE SERVICES
AUDIENCE:	ALL EMPLOYEES
REVIEW FREQUENCY:	ANNUALLY
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OWNED & REVIEWED BY:	HEAD OF PEOPLE SERVICES
APPROVED BY:	CHAIR OF BAT BOARD OF TRUSTEES / PEOPLE COMMITTEE
LAST APPROVAL DATE:	17.06.2026

Brunel Academies Trust (BAT) is a company limited by guarantee with registration number 10074054 and registered offices at Unit B4C Orbital Retail Park, Thamesdown Drive, Swindon, SN25 4AN; BAT is the parent company and Sole Corporate Member of the subsidiary company Brunel Education (BE). Brunel Education is a charitable company limited by guarantee with registration number 11991915, registered with the Charities Commission of England Wales (Charity Number 1214820) and with registered offices at Unit B4C Orbital Retail Park, Thamesdown Drive, Swindon, SN25 4AN.

Tier 1 policies are centrally held policies relating to Education, Governance, People Services, Finance, ICT and Operations and are the direct responsibility of BAT. Tier 1 policies are created by the BAT Central Services Team but adopted and reviewed by the BAT Board.

We are committed to a sustainable future and to improving the social, economic, and environmental well-being of the community. We are dedicated to environmental improvements that foster a sustainable future and lead to social and economical improvements in the communities we operate within.

Amendments to policy		
Date	Section	Amendment
August 2025	1	Addition of points 1.2, 1.4, & 1.5
	8	Addition of points 8.3 & 8.4
	10	Addition of point 10.2
June 2026	3	Update of Designated Officer information
	9	Addition of Responsibilities
	12	Addition of Monitor Section
	13	Addition of Sexual Harassment
	14	Addition of BAT's Responsibilities

1. Scope and purpose

- 1.1. BAT is committed to achieving a working environment which provides equality of opportunity and freedom from unlawful discrimination on the grounds of race, sex, pregnancy and maternity, marital or civil partnership status, gender reassignment, disability, religion or beliefs, age, or sexual orientation. This policy aims to remove unfair and discriminatory practices within BAT and to encourage full contribution from its diverse community. BAT is committed to actively opposing all forms of discrimination.
- 1.2. BAT is committed not only to eliminating discrimination but also to fostering a culture of inclusion, respect, and belonging. We aim to create an environment where every individual feels valued, supported, and empowered to contribute their full potential, regardless of their background or personal circumstances.

- 1.3. BAT also aims to provide a service that does not discriminate against its children and young people, vulnerable adults, and their parents and carers in the means by which they can access the education and work-related services supplied by BAT. Additionally, BAT believes that all employees and BAT's wider network of stakeholders are entitled to be treated with respect and dignity.
- 1.4. In addition to the protected characteristics set out in the Equality Act 2010, BAT recognises and values diversity in all its forms, including differences in socio-economic background, neurodiversity, caring responsibilities, and other personal circumstances that may influence a person's experiences and opportunities.
- 1.5. This policy applies to all individuals working with or for BAT, including employees, contractors, agency workers, volunteers, interns, and suppliers, as well as to all applicants for employment or engagement with BAT.

2. Statement of principles

- 2.1. BAT wholeheartedly supports the principles of equal opportunities and non-discrimination in service provision, the employment of people, and opportunities for service users.
- 2.2. We oppose all forms of unlawful and unfair discrimination or victimisation. To that end the purpose of this policy is to provide equality and fairness for all.
- 2.3. BAT will actively seek to eliminate all forms of discrimination, direct or indirect, which restricts or hinders the promotion of equal opportunities, the provision of equal treatment and the valuing of diversity.
- 2.4. To ensure that recruitment, promotion, training, development, assessment, benefits, pay, terms and conditions of employment, redundancy, and dismissals are determined on the basis of capability, qualifications, experience, skills, and productivity.

3. Designated Officer

Name	Position	Telephone Number
Sarah Bentley	Head of People Services	01793 286620

4. Definition of Discrimination

- 4.1. Discrimination is unequal or differential treatment which leads to one person being treated more or less favourably than others are, or would be, treated in the same or similar circumstances on the grounds of disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. These are known as "protected characteristics."
- 4.2. Discrimination after employment has ended can also be unlawful, for example in relation to the provision of an employment reference.

- 4.3. Discrimination may be direct or indirect and includes discrimination by perception and association.

5. Types of Discrimination

- 5.1. **Direct Discrimination:** This occurs when a person or a policy intentionally treats a person less favourably than another because of a protected characteristic. An example of direct discrimination would be refusing to employ a woman because she is pregnant.
- 5.2. **Indirect Discrimination:** This is the application of a policy, criterion or practice which the employer applies to all employees, but which is such that:
- It is detrimental to a considerably larger proportion of people from the group that the person the employer is applying it to represents.
 - The employer cannot justify the need for the application of the policy on a neutral basis.
 - The person to whom the employer is applying it suffers detriment from the application of the policy.
- 5.3. **Associative Discrimination:** This occurs where an individual is directly discriminated against or harassed for associating with another individual who has a protected characteristic. This might occur, for example, where a mother of a disabled child is treated less favourably as a result of her child's disability.
- 5.4. **Perceptive Discrimination:** This occurs where an individual is directly discriminated against or harassed based on a perception that they have a particular protected characteristic when they in fact do not have that protected characteristic. This might occur, for example, where an employee is subjected to homophobic bullying based on a perception that they are homosexual.
- 5.5. **Harassment:** This occurs where there is unwanted conduct related to one of the protected characteristics that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment. This conduct is considered as harassment even if the effect was not intended by the person responsible for the conduct.
- 5.6. **Victimisation:** This occurs when a person is subjected to detriment, such as being denied a training opportunity or promotion because they made or supported a complaint or raised a grievance under the Equality Act 2010, or because they are suspected of doing so. A person is not protected from victimisation if they acted maliciously or made or supported an untrue complaint.

6. Unlawful Reasons for Discrimination

- 6.1. **Sex/Gender:** It is not permissible to treat a person less favourably on the grounds of sex, marital status, civil partnership, pregnancy or maternity, gender reassignment, or transgender status. This applies to men, women, and those undergoing or intending to undergo gender reassignment. Sexual harassment of men and women can be found to constitute sex discrimination.

- 6.2. **Age:** It is not permissible to treat a person less favourably because of their age. This applies to people of all ages. This does not currently apply to the calculation of redundancy payments.
- 6.3. **Disability:** It is not permissible to treat a disabled person less favourably than a non-disabled person. Reasonable adjustments must be made to give the disabled person as much access to any services and ability to be employed, trained, or promoted as a non-disabled person.
- 6.4. **Race:** It is not permissible to treat a person less favourably because of their race, the colour of their skin, their nationality, or their ethnic origin.
- 6.5. **Sexual Orientation:** It is not permissible to treat a person less favourably because of their sexual orientation. For example, an employer cannot refuse to employ a person because they are homosexual, heterosexual, or bisexual.
- 6.6. **Religion or Belief:** It is not permissible to treat a person less favourably because of their religious beliefs, their religion, or lack of any religion or belief.
- 6.7. **Marital Status (including civil partnership):** It is not permissible to treat a person less favourably because of their marital status which includes civil partnership.

7. Positive Action in Recruitment

- 7.1. Under the Equality Act 2010, positive action in recruitment and promotion applies as of 6 April 2011. 'Positive action' means the steps that BAT can take to encourage people from groups with different needs or with a past record of disadvantage or low participation, to apply for positions within BAT.
- 7.2. If BAT chooses to utilise positive action in recruitment, this will not be used to treat people with a protected characteristic more favourably, it will be used only in tie-break situations, when there are two candidates of equal merit applying for the same position.

8. Reasonable Adjustments

- 8.1. BAT has a duty to make reasonable adjustments to facilitate the employment of a disabled person. These may include:
 - Making adjustments to premises.
 - Re-allocating some or all of the employee's duties.
 - Transferring the employee to a role better suited to their ability.
 - Relocating the employee to a more suitable office.
 - Giving the employee time off work for medical treatment or rehabilitation.
 - Providing training or mentoring for the employee.
 - Supplying or modifying equipment, instruction and training manuals for the employees.
 - Any other adjustments that BAT considers reasonable and necessary provided such adjustments are within the financial means of BAT.

- 8.2. If an employee has a disability and feels that any such adjustments could be made by BAT, they should contact the Designated Officer.
- 8.3. BAT is committed to reviewing reasonable adjustments on a regular basis to ensure they remain effective and appropriate, recognising that an individual's needs may change over time.
- 8.4. Reasonable adjustments may also include measures to support mental health and wellbeing, such as flexible working arrangements, quiet or low-stimulation workspaces, workload adjustments, or access to wellbeing resources and support services.

9. Responsibility for the Implementation of this policy

- 9.1. All employees, subcontractors, and agents of BAT are required to act in a way that does not subject any other employees or clients to direct or indirect discrimination, harassment or victimisation on the grounds of their race, sex, pregnancy or maternity, marital or civil partnership status, gender reassignment, disability, religion or beliefs, age, or sexual orientation.
- 9.2. The co-operation of all employees is essential for the success of this policy. Senior employees are expected to follow this policy and to try to ensure that all employees, subcontractors and agents do the same.
- 9.3. Employees may be held independently and individually liable for their discriminatory acts by BAT and in some circumstances an employment tribunal may order them to pay compensation to the person who has suffered as a result of discriminatory acts.
- 9.4. BAT takes responsibility for achieving the objectives of this policy, and endeavours to ensure compliance with relevant legislation and Codes of Practice.
- 9.5. BAT will not tolerate harassment, discrimination or victimisation of employees by third parties, including parents, carers, pupils, contractors, visitors, suppliers, governors or members of the public.
- 9.6. Allegations of third-party harassment will be taken seriously, and appropriate action will be taken to prevent recurrence.

10. Acting on Discriminatory Behaviour

- 10.1. In the event that an employee is the subject or perpetrator of, or witness to, discriminatory behaviour, please refer to the BAT Disciplinary Policy, the BAT Resolution Policy, or the BAT Whistleblowing Policy. Employees are encouraged to speak to a member of the Senior Leadership Team (SLT) or People Services at any time if they believe they have been subject to or have witnessed discriminatory behaviour.
- 10.2. No employee, contractor, or other individual covered by this policy will be subjected to any form of retaliation or disadvantage for raising a concern, making a complaint, or assisting in an investigation in good faith under this policy.

11. Advice and Support on Discrimination

11.1. Employees may contact their employee or trade union representative if access to such an individual is possible. Other contacts include:

- **Equality and Human Rights Commission.** 3 More London, Riverside Tooley Street, London, SE1 2RG. Telephone (England): 0161 829 8100. Website: www.equalityhumanrights.com.
- **Citizens Advice Bureau.** Myddleton House, 115-123 Pentonville Road, London, N1 9LZ. Website: www.citizensadvice.org.uk.

12. Monitor

BAT may monitor workforce diversity data, recruitment outcomes, promotion outcomes, training participation to identify trends and ensure equality of opportunity.

13. Sexual Harassment

Sexual Harassment occurs where a person engages in unwanted conduct of a sexual nature which has the purpose or effect of:

- Violating another person's dignity; or
- Creating an intimidating, hostile, degrading, humiliating or offense environment

BAT adopts a zero-tolerance approach to sexual harassment and expects all employees, workers, contractors, volunteers, visitors and third parties to behave appropriately and respectfully.

Further information on Sexual Harassment is located in BAT's Sexual Harassment Policy.

14. The Extent of the Policy

14.1. BAT seeks to apply this policy in the recruitment, selection, training, appraisal, development, and promotion of all employees. BAT offers services in a fashion that complies with the spirit of this policy.

14.2. This policy does not form a part of any employment contract with any employee and its contents are not to be regarded by any person as implied, collateral, or express terms to any contract made with BAT.

14.3. BAT recognises its responsibilities under the Public Sector Equality Duty and seeks, in carrying out its functions, to:

- Eliminate unlawful discrimination, harassment and victimisation
- Advance equality of opportunity
- Foster good relations between people who share a protected characteristic and those who do not.

14.4. BAT reserves the right to amend and update this policy at any time.

This policy is adopted by the BAT Board of Trustees and will be reviewed every year or earlier if change to legislation.

Signed on behalf of the BAT Board of Trustees:

Signed:  CEO

Signed:  Chair of BAT Board

Date: 17.06.2026