SHERBORNE
SCHOOLS GROUP

Equal Opportunities Policy for Staff

Approving body: Governance & Nominations Committee
Owner: Chief Operating Officer
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Executive Summary

This document is for employees of the Sherborne Schools Group and outlines the Group's commitment to equality, fairness, respect and dignity at work, and eliminating all forms of discrimination.

It aims to raise awareness amongst employees with regard to discrimination, to ensure a fair, respectful and inclusive workplace where everyone feels valued.

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Contents

Introduction 2
Implementation and Responsibilities 3
Forms of Discrimination 3
Direct Discrimination 4
Indirect Discrimination 4
Discrimination Arising from Disability 4
Victimisation 4
Harassment and Sexual Harassment 4
Recruitment, Selection and Progression 5
Equal Pay 5
Disability 6
Breaches of the Policy 6
Summary of Changes in Issue 3 7

Introduction

The Sherborne Schools Group (the Group), of which Sherborne School, Sherborne Girls, Sherborne Prep, Hanford, Sherborne International and their trading subsidiaries are parts, is an equal opportunities employer and will take every possible step to ensure that employees are treated fairly. The Group is committed to encouraging equality, diversity and inclusion, and eliminating any form of discrimination. All Group policies and practices conform with the principle of equal opportunities, particularly but not exclusively in terms of:

- recruitment and selection
- opportunities for training, promotion and career development
- pay and benefits
- terms and conditions of employment
- conduct at work
- grievance and disciplinary matters
- redundancy and dismissal.

No employee or prospective employee will receive unfair or unlawful treatment on the grounds of a Protected Characteristic, because they are perceived to have a Protected Characteristic, or because they are associated with someone who has a Protected Characteristic. The protected characteristics under the Equality Act 2010 are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
These principles of non-discrimination and equality of opportunity also apply to the way in which employees must treat visitors, pupils, parents, suppliers and former members of staff.

This policy applies to the Group's staff, whether permanent, temporary, casual, part-time or on fixed-term contracts. The Equal Opportunities principles outlined in this policy also apply to other individuals who may work at or have interactions with the Group from time to time. This may include employees, workers, applicants, contractors, consultants and volunteers. Where

these individuals have not complied with the principles of equal opportunities in their interactions with the Group, the Group will take appropriate steps to follow up and take appropriate action in accordance with the circumstances and arrangements.

The operation of the Group's policies and procedures will be reviewed regularly to ensure that no employee or prospective employee is disadvantaged by conditions or requirements which cannot be shown to be justifiable. Where there is any conflict between this policy and the policies of individual schools and trading subsidiaries within the Group, this policy takes precedence.

Implementation and Responsibilities

The Governing Body has overall responsibility for the effective operation of this policy and for ensuring compliance with the relevant statutory framework prohibiting discrimination. The Governing Body has delegated day-to-day responsibility for operating the policy and ensuring its maintenance and review to Senior Staff, specifically the Heads, the COO and the Human Resources department (HR).

All employees working in positions of management or leadership within the Group have a specific responsibility to:

- set standards of behaviour
- lead by example
- ensure that those they line manage adhere to the policy and promote the aims and objectives of the Group with regard to equal opportunities.

All employees of the Group have a duty to:

- act in accordance with this policy
- treat colleagues with dignity at all times
- not discriminate against, harass or victimise other members of staff.

The Group is committed to supporting its employees and ensuring that the work environment is one where every member of staff feels valued and respected. As an employer, the Group is aware that there are circumstances where it may be at risk of being held responsible for the acts of individual members of staff and therefore will encourage an environment of inclusivity. The Group, with the assistance of its employees, will:

- break down any barriers to equality of opportunity which may prevent employees from realising their full potential or accessing benefits
- advertise vacancies and ensure job selection criteria are appropriate for the role
- promptly and fully investigate all complaints of discrimination and harassment, taking appropriate action where necessary
- ensure that all employees are fully aware of and understand this policy
- examine and review existing procedures to ensure they are not discriminatory in their operation
- ensure that the language used in official communication reflects the letter and spirit of the policy
- not tolerate any discriminatory practices or behaviour.

Forms of Discrimination

The Equality Act 2010 provides protection against a number of forms of unlawful discrimination and prohibited conduct. These include direct discrimination, indirect discrimination,

harassment and victimisation. Additional protections apply in relation to disability, including discrimination arising from disability and the duty to make reasonable adjustments.

Direct Discrimination

Direct discrimination is where somebody has been treated differently or worse than another employee due to a Protected Characteristic. It may also occur where treatment is based on a perception that someone has a protected characteristic, or because of their association with someone who has a protected characteristic.

Indirect Discrimination

Indirect discrimination can occur where a provision, criterion or practice applies, or would apply, equally to everyone but puts people who share a particular protected characteristic at a particular disadvantage, and puts the individual concerned at that disadvantage. Indirect discrimination may be lawful where the provision, criterion or practice can be objectively justified.

Discrimination Arising from Disability

Discrimination arising from disability can occur where a disabled person is treated unfavourably because of something arising in consequence of their disability and the treatment cannot be objectively justified. The Group will ensure that disability-related circumstances are appropriately considered when making employment decisions.

Victimisation

Victimisation occurs where an individual is subjected to a detriment because they have carried out, or are believed to have carried out, a protected act under the Equality Act 2010. This may include raising concerns or making an allegation of discrimination, supporting another person's complaint, giving evidence or bringing proceedings under the Equality Act 2010.

Harassment and Sexual Harassment

Harassment is unwanted conduct related to a protected characteristic which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment. It may take many forms, including verbal, non-verbal, physical or online conduct. A single incident may amount to harassment.

Conduct may amount to harassment even where there was no intention to offend. In considering whether conduct has had the prohibited effect, the circumstances, the individual's perception and whether it was reasonable for the conduct to have that effect will be taken into account.

Sexual harassment is unwanted conduct of a sexual nature which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment. It also includes less favourable treatment because someone has submitted to, or rejected, unwanted conduct of a sexual nature or unwanted conduct related to sex or gender reassignment.

The Group will take **all reasonable steps to prevent harassment and sexual harassment in the course of employment**, including harassment by third parties such as pupils, parents, visitors, contractors and suppliers. This includes assessing relevant risks, promoting appropriate standards of behaviour and taking appropriate action where concerns arise.

Harassment and sexual harassment will not be tolerated and may result in disciplinary action. Serious cases may constitute gross misconduct and may result in summary dismissal following an appropriate disciplinary process.

Further information about sexual harassment, preventative measures and how concerns can be raised is contained in the **SSG Sexual Harassment Policy**. Employees should also refer to the **SSG Staff Code of Conduct** and **Staff Grievance Policy**.

Recruitment, Selection and Progression

The Group recognises that fostering an inclusive diverse culture adds value through developing ideas, experiences, skills, knowledge and creativity as well as employee wellbeing and engagement. The Group is committed to attracting staff from a wide talent pool in order to replicate the global community in which we live, and to benefit from the breadth of skills and experiences that people from different backgrounds can contribute.

The recruitment, selection and progression processed within the Group are governed by the Group's principles of non-discrimination and the Group aims to ensure that no job applicant or employee receives less favourable treatment on any of the unlawful grounds listed in this policy:

Recruitment procedures will be reviewed regularly to ensure that individuals are treated on the basis of their individual merits. All applicants will be dealt with courteously and as expeditiously as possible.

Job selection criteria will always be justifiable on non-discriminatory grounds as being essential for the effective performance of the job. In line with safer recruitment practices, appointments will only be confirmed on receipt of appropriate pre-employment, safeguarding and right to work checks relevant to the role and in accordance with the Group's Recruitment, Selection and Disclosure Policy and Procedures.

Recruitment and promotion decisions will be made fairly and consistently against objective, role-related criteria.

All employees will be given fair opportunities and access to training to enable them to progress within the Group. Staff training needs shall be identified through annual staff development reviews/ appraisals and interim updates in conjunction with the relevant training-needs-analysis.

Equal Pay

As part of the Group's commitment to equal opportunities, all employees, regardless of gender, should receive equal pay for:

- the same or similar work
- work rated as equivalent under a job evaluation study
- work of equal value.

Equal pay means all forms of contractual remuneration (including overtime rates, pension benefits, sick leave and holiday pay) and non-cash contractual benefits.

The Group aims to ensure that it operates a fair and transparent pay system based on objective criteria and free from gender bias. The Group will do this by:

- carrying out annual reviews of pay and benefits for existing employees and initial pay and benefits for new employees within the Group (including those on parental leave and sick leave), considering the findings and taking action to address any pay discrimination

- preparing an annual gender pay gap report to identify any difference in the average pay between male and female workers, and publishing that information on the Group's website
- carrying out regular checks of the pay grading structure within the organisation's pay structures to ensure they are free from bias, that there are no unjustifiable differences between average rates of pay for male and female workers within each pay grade, and that there is no discrimination in the progression within and through the grades
- informing staff of how their pay has been determined in each salary review.

The Chief Operating Officer and Heads are responsible for equal pay within the Group and will review and ensure compliance with this policy with the HR department at regular intervals, which will be at least annually.

Disability

Employees who are disabled within the meaning of the Equality Act 2010, or who have a physical or mental health condition which may affect them at work, are encouraged to discuss with the Group any support or workplace adjustments they may require.

Careful consideration will be given to every proposal for reasonable adjustment to work based on disability and the Group may wish to consult with a medical advisor about possible reasonable adjustments. The Group will comply with its duty to make reasonable adjustments where required under the Equality Act 2010. Employees and applicants are encouraged to discuss any adjustments they may require with their line manager or HR. The Group will consider requests individually, taking account of the circumstances, the individual's needs and the requirements of the role.

School sites across the Group will be reviewed from time to time to ensure appropriate and suitable access for all (see Accessibility Plan). The Group will monitor the physical features of its premises to consider whether it can make any changes to help remove disadvantages which these may create for disabled users. Where possible and proportionate, the Group will take steps to improve access for disabled users of the premises.

Breaches of the Policy

If an employee considers that they have been discriminated against, disadvantaged or harassed within the Sherborne Schools Group workplace, they are encouraged to raise the matter through the Group's grievance procedures. Allegations regarding potential breaches of this policy will be treated sensitively, and as confidentially as reasonably practicable. Information will be shared only where appropriate and necessary to consider, investigate or respond to the matter.

Should the employee prefer to speak with someone before raising a grievance, they are encouraged to do so with their Line Manager, a member of SLT or the HR department. Where information arising from a complaint or grievance indicates that there may have been misconduct, the matter may be considered under the Staff Disciplinary Policy. Where appropriate, further investigation may be undertaken before any disciplinary decision is made.

If the employee chooses to raise a grievance, and following the conclusion of the grievance procedure it is considered that they have been harassed or bullied by an employee then the matter will be dealt with under the Staff Disciplinary policy as a case of possible misconduct or gross misconduct. If the harasser or bully is a third party such as a parent or visitor, the Group will consider what action would be appropriate to deal with the problem. Whether or not the

grievance is upheld, consideration will be given to how best to manage any ongoing working relationship between the persons concerned.

The procedures linked to equal opportunities apply during and after termination of employment. The Group wishes to ensure that staff feel comfortable about raising such complaints. No individual will be penalised for making an allegation in good faith. Employees will not be subjected to disciplinary action simply because a complaint is not upheld. However, where, following appropriate investigation, an employee is found to have deliberately made an allegation which they knew to be false or misleading, the matter may be considered under the Staff Disciplinary Policy.

If an employee has a grievance raised against them regarding a breach of this policy, an investigation will be carried out as outlined above. Where, following a fair disciplinary process, allegations of conduct contrary to this policy are found to be substantiated, appropriate disciplinary action may be taken. Serious breaches may constitute gross misconduct and may result in summary dismissal.

The Group will always take a strict approach to serious breaches of this policy.

Summary of Changes in Issue 3

- Approving body changed to Governance & Nominations Committee.
- Section on 'Forms of Discrimination' materially rewritten for improved clarity and to include discrimination arising from disability.
- Section on 'Dignity at Work' removed.
- Minor rewording in section on 'Recruitment, Selection and Progression'.
- Sections on 'Disability' and 'Breaches of the Policy' updated.