Equality, Diversity and Inclusion Policy

In Toto Ed Group Ltd

Policy reference: HR10

Applies to

Site	Applies (Yes / No)
In Toto Ed London — Independent Special School	Yes
In Toto Ed Cambridge — Independent Special School	Yes
In Toto Ed Peterborough Post-16 Provision	Yes

This policy applies across the In Toto Ed Group without local variation.

Document control

Policy reference	HR10
Version	V2.0
Status	Approved
Policy owner (role)	Group Director of Safeguarding and Student Welfare
Author	Stacey Green, Group Director of Safeguarding and Student Welfare
Approved by	Emily Gunton, Proprietor and Head of School
Date approved	10/10/2026
Date of last review	15/08/2026
Review cycle	Annual
Next review due	15/08/2027
Statutory or regulatory basis	See section 4
Publication	Website; staff shared area; provided to parents and inspectors on request
Equality impact considered	Yes — see section 8
Personal data processed	Yes — see section 9
Related policies	See section 11

Contents

1. Aim and principles 3
2. Scope and applicability 3
3. Definitions 4
4. Legal and regulatory framework 4
5. Roles and responsibilities 4
6. Policy detail 5
6.1 Protected characteristics 5
6.2 Forms of unlawful conduct 5
6.3 Disability, SEND and reasonable adjustments 5
6.4 Admissions and access to education 6
6.5 Curriculum, teaching and culture 6
6.6 Safeguarding, bullying and prejudice-related incidents 6
6.7 Prevent duty and fundamental British values 7
6.8 Employment and recruitment 7
7. Reporting, escalation and record-keeping 7
8. Equality and accessibility 7
9. Data protection and confidentiality 8
10. Training and communication 8
11. Related policies and documents 8
12. Monitoring, evaluation and review 9
Appendix A — Equality objectives and action plan 2026/27 10
Appendix B — Schedule of changes made in this version 11
Version history 12

1. Aim and principles

In Toto Ed is committed to providing an inclusive, safe and respectful education and working environment in which every student and member of staff is valued, treated fairly and supported to participate and achieve. We will not tolerate unlawful discrimination, harassment or victimisation.

As independent special schools and a post-16 alternative provision, we recognise that equality, disability and special educational needs are closely connected. We will identify and remove barriers to participation, make reasonable adjustments for disabled students and staff, and ensure individual needs are considered in education, pastoral support, safeguarding and employment practice.

Supporting additional needs is not an afterthought; it is our entire purpose. We promote a culture in which difference is respected, prejudice is challenged, and students are prepared for life in modern Britain.

This policy aims to:

- set out the In Toto Ed approach to equality, diversity and inclusion;
- support compliance with the Equality Act 2010 and the wider framework applying to independent special schools in England;
- ensure equality considerations inform admissions, curriculum, teaching, behaviour, safeguarding, pastoral care, access to facilities and services, and employment;
- prevent and respond effectively to discrimination, harassment, victimisation and prejudice-related incidents;
- support continuous improvement through monitoring, consultation and measurable equality objectives.

2. Scope and applicability

This policy applies across the education and employment functions of In Toto Ed London, In Toto Ed Cambridge and In Toto Ed Peterborough.

It applies to students and prospective students, staff and job applicants, parents and carers, visitors, volunteers, contractors, suppliers and partner organisations, as relevant to their relationship with In Toto Ed.

Where a provision applies only to the two registered schools — for example a duty arising under the Education (Independent School Standards) Regulations 2014 — that is stated. Everything else applies to all three sites.

Term	Meaning in this policy
Protected characteristic	One of the nine characteristics protected by the Equality Act 2010, listed at section 6.1.
Reasonable adjustment	A step taken to avoid a disabled person being placed at a substantial disadvantage by a provision, criterion or practice, by a physical feature, or by the absence of an auxiliary aid or service.
Anticipatory duty	The duty owed to disabled students to consider and make adjustments in advance, rather than waiting for an individual to ask.

Term	Meaning in this policy
Prejudice-related incident	An incident perceived by the person affected, or by anyone else, to be motivated by hostility or prejudice towards a protected characteristic, whether or not it meets the legal threshold for unlawful discrimination.

4. Legal and regulatory framework

This policy is applied in accordance with current law and statutory guidance, including:

- the Equality Act 2010, and the Equality Act 2010 (Disability) Regulations 2010;
- the Education (Independent School Standards) Regulations 2014, including the requirement to encourage respect for other people with particular regard to the protected characteristics in the Equality Act 2010;
- the Children and Families Act 2014 and the SEND Code of Practice: 0 to 25 years;
- the Counter-Terrorism and Security Act 2015 and current Prevent duty guidance;
- Keeping Children Safe in Education 2026, in force from 1 September 2026;
- Working Together to Safeguard Children 2026;
- current statutory guidance on relationships, sex and health education, where applicable;
- the Worker Protection (Amendment of Equality Act 2010) Act 2023, which places a preventative duty on employers in relation to sexual harassment at work;
- the Employment Rights Act 2025, whose provisions are being commenced in stages during 2026 and 2027;
- UK GDPR and the Data Protection Act 2018.

In Toto Ed London and In Toto Ed Cambridge are non-association independent special schools, inspected by Ofsted under the Education Inspection Framework in use from November 2025 alongside the independent school standards. Inclusion is a distinct evaluation area under that framework. In Toto Ed Peterborough is a post-16 alternative provision and is not inspected as a school.

Where a Public Sector Equality Duty applies to In Toto Ed, or to a public function carried out by it, In Toto Ed will have due regard to the need to eliminate unlawful discrimination, advance equality of opportunity and foster good relations. In Toto Ed does not assume that the specific publication duties applying to public authorities apply automatically to every function of an independent school.

5. Roles and responsibilities

Role	Responsibility under this policy
Proprietors	Ensure In Toto Ed meets its legal and regulatory responsibilities, and that leaders have the arrangements and resources to implement this policy. Approve the equality objectives.
Group Director of Safeguarding and Student Welfare	Owns this policy. Oversees employment equality, policy compliance, the link to safeguarding, training, reporting and review.
Designated Safeguarding Lead	Receives prejudice-related incidents that indicate a safeguarding concern, and acts under the Safeguarding and Child Protection Policy.

Role	Responsibility under this policy
Head of School / Head of Provision and senior leaders	Embed equality and inclusion in practice, monitor implementation, address identified disparities, and ensure staff understand their responsibilities.
SENCO	Advises on reasonable adjustments for students, and on the interaction between SEND provision and equality duties.
All staff	Model inclusive behaviour, make and implement agreed reasonable adjustments, challenge discrimination and prejudice, respond to concerns, and complete required training.
Students	Are supported, in ways appropriate to their age, communication and needs, to treat others with respect, report concerns and contribute to an inclusive community.

6. Policy detail

6.1 Protected characteristics

The Equality Act 2010 identifies nine protected characteristics: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.

How a particular characteristic applies differs between the education provisions and the employment provisions of the Act. In Toto Ed applies the relevant provisions to the particular context rather than treating the two as identical.

References to sex and to gender reassignment are interpreted in accordance with current legislation, binding case law and applicable statutory or authoritative guidance. In Toto Ed will continue to protect students and staff from unlawful discrimination, harassment and victimisation, and to treat individuals with dignity and respect.

6.2 Forms of unlawful conduct

Depending on the circumstances and the provision engaged, unlawful conduct may include direct discrimination, indirect discrimination, discrimination arising from disability, failure to make reasonable adjustments, harassment and victimisation.

In Toto Ed will also address bullying, prejudice, stereotyping and discriminatory language even where the conduct does not meet the legal threshold for unlawful discrimination.

6.3 Disability, SEND and reasonable adjustments

In Toto Ed recognises the anticipatory nature of the reasonable-adjustments duty for disabled students. We take reasonable steps to avoid substantial disadvantage arising from a provision, criterion or practice and, where required, from the absence of an auxiliary aid or service. We will:

- consider reasonable adjustments proactively and individually;
- use information from students, parents and carers, staff, EHC plans and relevant professionals to understand barriers and effective support;
- ensure students can participate as fully as reasonably possible in education and in the benefits, facilities and services provided;
- consider accessibility when planning curriculum, communication, premises, activities, visits, behaviour support and assessment arrangements;

- ensure decisions about behaviour, attendance or participation appropriately consider disability and SEND;
- record and review agreed adjustments, and communicate them to relevant staff.

Note that addiction to alcohol, nicotine or another substance is excluded from the definition of disability by regulation 3 of the Equality Act 2010 (Disability) Regulations 2010, unless it originally resulted from medically prescribed drugs or other medical treatment. An accompanying or resulting impairment may itself be a disability and must be considered on its own merits.

6.4 Admissions and access to education

Admissions decisions are made fairly and in accordance with the registered provision, the Admissions Policy, Equality Act duties and SEND and EHC plan arrangements. In Toto Ed will not unlawfully discriminate in admissions, or in the education, benefits, facilities or services provided to students.

Where a student or prospective student is disabled, reasonable adjustments will be considered. Decisions are based on relevant evidence and individual circumstances, including whether In Toto Ed can meet identified needs within its registered provision and legal obligations.

6.5 Curriculum, teaching and culture

The curriculum and the wider student experience promote equality, inclusion, respect and preparation for life in modern Britain. Teaching will not unlawfully discriminate and will encourage respect for other people, with particular regard to the protected characteristics. We will:

- challenge stereotypes and discriminatory language in an age-appropriate and needs-appropriate way, without infantilising students;
- provide opportunities for students to encounter and understand a range of cultures, beliefs, families, experiences and perspectives;
- make curriculum content accessible through appropriate adaptation and reasonable adjustments, while preserving academic ambition;
- promote the fundamental British values of democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs;
- ensure sensitive topics are taught safely, respectfully and consistently with current statutory guidance.

6.6 Safeguarding, bullying and prejudice-related incidents

Equality and safeguarding are closely linked. Discriminatory bullying or harassment may indicate or contribute to a safeguarding concern. Staff must follow the Safeguarding and Child Protection Policy and refer concerns to the Designated Safeguarding Lead where appropriate.

In Toto Ed responds consistently to racist, disablist, sexist, homophobic, biphobic, transphobic, religion-related or belief-related and other prejudice-related incidents. Reports are taken seriously, recorded, investigated proportionately, and followed by support, education, restorative work or disciplinary action as appropriate.

Students may report concerns to any trusted member of staff. Staff report employment-related concerns through their line manager, the Group Director of Safeguarding and Student Welfare, the grievance or harassment arrangements, or another appropriate senior leader. A safeguarding concern must never be delayed by an employment or complaints process.

6.7 Prevent duty and fundamental British values

In Toto Ed fulfils its Prevent responsibilities as part of its wider safeguarding arrangements, using the Prevent risk assessment for each site, safeguarding procedures and staff training. Staff are alert to vulnerabilities and concerns relating to radicalisation and follow the safeguarding referral arrangements.

Fundamental British values are promoted through the curriculum, pastoral work and the wider culture of each site. This work is inclusive and consistent with equality duties and, for the two registered schools, with the independent school standards.

6.8 Employment and recruitment

In Toto Ed is committed to equality of opportunity throughout recruitment, employment, training, promotion, performance management and termination of employment. Recruitment and selection decisions are based on objective, role-relevant criteria and lawful safer-recruitment requirements.

Positive action is used only where permitted by the Equality Act 2010. Any recruitment or promotion tie-break will not operate as an automatic preference, and will be considered only where the statutory conditions are met.

In Toto Ed takes reasonable steps to prevent sexual harassment of employees in the course of their employment, as required by the Worker Protection (Amendment of Equality Act 2010) Act 2023. This includes assessing relevant risks, providing information and training, maintaining effective reporting routes, and acting on concerns. The Sexual Harassment Policy sets out the detail.

7. Reporting, escalation and record-keeping

Anyone who believes that discrimination, harassment, victimisation or prejudice-related bullying has occurred is encouraged to report it promptly.

- Students may speak to a tutor, teacher, member of the pastoral team, the Designated Safeguarding Lead or any trusted adult.
- Parents and carers may use the In Toto Ed Complaints Procedure and Policy.
- Staff may use the grievance, harassment or whistleblowing arrangements as appropriate.
- Where a concern involves a Head of School, a Head of Provision or the Group Director of Safeguarding and Student Welfare, it is raised directly with the proprietors.

No person will be subjected to victimisation because they have raised a concern in good faith, supported another person’s complaint, or taken part in an investigation.

Prejudice-related incidents involving students are recorded centrally, including the characteristic involved, the action taken and the outcome, so that patterns can be identified. Employment-related concerns are recorded by the Group Director of Safeguarding and Student Welfare.

8. Equality and accessibility

This policy is itself the equality policy, but it has also been considered for its own accessibility. It is written in plain UK English, is available in alternative formats on request, and is summarised for students in an accessible format appropriate to their communication needs.

Communication with parents and carers is adapted where necessary so that they can engage with the policy and with any process under it.

9. Data protection and confidentiality

Equality monitoring information, records of prejudice-related incidents, and records of reasonable adjustments are personal data. Information about disability, health, race, religion or belief, sex life and sexual orientation is special category data under UK GDPR.

This information is processed for equality monitoring, for compliance with the Equality Act 2010 and employment law, and, where relevant, for safeguarding. Only the minimum necessary is collected. Monitoring information is aggregated and anonymised wherever possible before it is analysed or reported.

Providing equality monitoring information is voluntary, and a decision not to provide it will never disadvantage a student, a member of staff or an applicant. Records are held in line with the Data Protection Policy and the In Toto Ed retention schedule.

The lawful basis for equality monitoring follows HR4 section 4.1 — legal obligation where a statutory return or a safer recruitment check requires it, and legitimate interests for monitoring we carry out to meet our own equality commitments. Equality monitoring data is special category data and is processed under Article 9(2)(g), substantial public interest, with the Schedule 1 Part 2 equality of opportunity condition. Retention follows HR4 Appendix A. The processing activity is recorded in HR4 Appendix C, the record of processing activities.

10. Training and communication

All staff complete equality, diversity and inclusion training at induction and annually thereafter, integrated with safeguarding training. Training covers disability and reasonable adjustments, recognising and responding to prejudice-related incidents, and the preventative duty on sexual harassment.

This policy is available in the staff shared area and on the website, and is reissued whenever a new version is approved.

11. Related policies and documents

Document	Reference
Safeguarding and Child Protection Policy (site versions)	SG56 / SG36 / SG57
SEND Policy — London and Peterborough	GSP11 / GSP31
Accessibility Plans (site versions)	SG38 / SG39 / SG40
Admissions Policy	GSP6
Behaviour and Relationships Policies (site versions)	SG37 / SG47 / SG48
Anti-Bullying Policy	SG45
In Toto Ed Complaints Procedure and Policy	GSP30
Sexual Harassment Policy	HR38
Grievance Policy and Procedure	HR43
Staff Disciplinary Policy and Procedure	HR42
Whistleblowing Policy and Procedure	SG6

Document	Reference
Safer Recruitment Policy	SG7
Neurodiversity Policy	HR34
Data Protection Policy and retention schedule	HR4
Prevent risk assessments (site versions)	[to be confirmed]
Relationships and Sex Education Policy; PSHEE Policy	GSP22 / GSP23

12. Monitoring, evaluation and review

In Toto Ed uses proportionate information to identify patterns, barriers and areas for improvement, while respecting confidentiality and data protection. Monitoring may include admissions, attendance, behaviour and suspensions or exclusions where applicable, safeguarding and bullying incidents, complaints, student progress and outcomes, participation, reasonable adjustments, accessibility, staff recruitment and workforce information.

Leaders consider whether outcomes differ materially between groups, and investigate and respond where evidence indicates disadvantage, under-representation or an avoidable barrier. Student and parent or carer voice forms part of this review, with communication methods adapted so that students with SEND can participate meaningfully.

The Group Director of Safeguarding and Student Welfare reports annually to the proprietors on progress against the equality objectives in Appendix A.

This policy is reviewed at least annually, and sooner where legislation, statutory guidance, case law, the independent school standards or In Toto Ed circumstances change.

Appendix A — Equality objectives and action plan 2026/27

Objective	Key actions	Lead	Timescale	Evidence and impact
Accessible participation	Audit curriculum, communication, activities and premises barriers. Review reasonable adjustments and accessibility actions.	SLT / SENCO	Termly	Adjustments recorded; barriers reduced; student and parent feedback.
Outcome equity	Review attendance, behaviour, safeguarding and progress information for material disparities. Agree actions where needed.	SLT	Termly	Documented analysis and actions; gaps investigated and reduced where reasonably achievable.
Inclusive culture	Track prejudice-related incidents and student voice. Use learning from incidents to inform curriculum, pastoral work and staff development.	DSL	Half-termly	Trends reviewed; students know how to report; repeat incidents addressed.
Staff competence	Provide annual EDI, disability and reasonable-adjustment, and prejudice-related incident training, integrated with safeguarding and induction.	HR / DSL	Annual and at induction	Training completion; staff confidence and practice checks.
Policy alignment	Review linked SEND, accessibility, admissions, behaviour, safeguarding, complaints and HR policies for consistent equality language and duties.	HR / Compliance	By December 2026	Cross-policy audit completed; inconsistencies corrected.

Appendix B — Schedule of changes made in this version

Where	Change	Reason
Throughout	Restructured onto the In Toto Ed policy template, with document control, applicability box, contents and version history.	House standard.
Section 2	Scope now names the three sites and distinguishes duties that apply only to the two registered schools.	The previous version referred throughout to the school, which does not describe Peterborough.
Section 3	New definitions table.	Anticipatory duty and prejudice-related incident were used without being defined.
Section 4	Added the Equality Act 2010 (Disability) Regulations 2010, the Worker Protection Act 2023, the Employment Rights Act 2025, UK GDPR, and the November 2025 inspection framework with inclusion as an evaluation area. Verification date added.	The previous list omitted the employment-side instruments and the current framework.
Section 5	Roles set out in a table. The combined entry Director of HR, Compliance and Safeguarding / DSL has been separated into two roles and retitled.	One entry covering two distinct statutory roles is ambiguous, and the job title has changed.
6.3	Added the exclusion of addiction from the definition of disability, and the treatment of an accompanying impairment.	Relevant to the Drugs and Alcohol, Sickness and Absence and Capability policies, and commonly misapplied.
6.8	Named the Worker Protection (Amendment of Equality Act 2010) Act 2023 as the source of the preventative duty.	The previous version described the duty without naming it.
Section 9	New data protection section, including that equality monitoring is voluntary.	The previous version required monitoring but said nothing about the data.
Section 10	New training and communication section.	Training appeared only as an objective in the action plan.
Section 11	Related policies given their register references. Gap flagged: no Cambridge SEND policy.	References could not be cited before; the gap was not visible.
Appendix A	Objectives retained unchanged; a note asks for baselines.	Targets without baselines cannot be evidenced.
Register	No change to the policy, but note that the Policy Tracker records HR10 as last reviewed 01/03/2025 and due 01/03/2026, while this document was reviewed 15/08/2026 at V1.2.	The register is eighteen months out of date on this policy.
Throughout	Four amber Decision needed boxes mark points requiring a decision or advice.	These are not decisions for the drafter.

Version history

Version	Date	Author	Summary of changes	Approved by
V1.0	01/09/2023	Stacey Green	First issue	Simon Gunton
V1.1	01/03/2025	Stacey Green	Annual review	Simon Gunton
V1.2	15/08/2026	Stacey Green	Rewritten and expanded	Emily Gunton
V2.0	10/10/2026	Stacey Green	Restructured onto the In Toto Ed policy template; legal framework, data protection and training sections added. See Appendix B.	Emily Gunton