



Equal Opportunities Policy

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The Sovereign Trust is a Multi Academy Trust registered in England No. 09666511. Registered Office: Manor Academy, Sale M33 5JX



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0.1 to 0.4	Oct 2021 to Oct 2022	Initial Draft – Reviewed by the HR Team & the Trust Board. Consultation Process – Draft shared with the working group consisting of Senior Leaders, HR, and the Trade Unions.	Lisa-Marie McGrath	Consulted & Reviewed, and implemented agreed points
1.0	01/12/2022	Final Draft – Approved by the CEO and The Trust Board	Lisa-Marie McGrath	Approved
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Equal Opportunities Policy

1. EQUAL OPPORTUNITIES STATEMENT

- 1.1 The Sovereign Trust ("Trust") is committed to promoting equal opportunities in employment. Accordingly, you and any job applicants will receive equal treatment regardless of age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation (**Protected Characteristics**).

2. ABOUT THIS POLICY

- 2.1 This policy sets out our approach to equal opportunities and the avoidance of discrimination at work. It applies to all aspects of employment with us, including recruitment, pay and conditions, training, appraisals, promotion, conduct at work, disciplinary and grievance procedures, and termination of employment.

3. DISCRIMINATION

- 3.1 You must not unlawfully discriminate against or harass other people, including current and former employees, job applicants, clients, customers, suppliers and visitors. This applies in the workplace, outside the workplace (when dealing with customers, suppliers or other work-related contacts, and on work-related trips or events, including social events).
- 3.2 Protected characteristics are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.
- 3.3 The following forms of discrimination are prohibited under this policy and are unlawful:
- **Direct discrimination:** treating someone less favourably because of a Protected Characteristic. For example, rejecting a job applicant because of their religious views or because they might be gay.
 - **Indirect discrimination:** where a provision, criterion or practice that applies to everyone but adversely affects people with a particular Protected Characteristic more than others and is not justified.
 - **Harassment:** this includes sexual harassment and other unwanted conduct related to a Protected Characteristic, which has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. Harassment is dealt with further in our Anti-harassment and Bullying Policy.

- Victimisation: subjecting someone to a detriment that has complained or supported someone else's complaint about discrimination or harassment.
- Disability discrimination includes direct and indirect discrimination, unjustified, less favourable treatment because of the effects of a disability, and failure to make reasonable adjustments to alleviate disadvantages caused by a disability.

4. RECRUITMENT AND SELECTION

- 4.1 Recruitment, promotion, and other selection exercises, such as redundancy selection, will be conducted based on merit against objective criteria that avoid discrimination. Shortlisting should be done by more than one person and with the involvement of the HR department, where possible.
- 4.2 Vacancies should generally be advertised to a diverse section of the labour market. Advertisements should avoid stereotyping or wording that may discourage particular groups from applying. They should include a short policy statement on equal opportunities, and a copy of this policy will be made available on request.
- 4.3 We take steps to ensure that our vacancies are advertised to a diverse labour market and, where relevant, to particular groups that have been identified as disadvantaged or underrepresented in our organisation. Where appropriate, the HR Department may approve the use of lawful exemptions to recruit someone with a particular Protected Characteristic, for example, where a woman can only do the job. The advertisement should specify the exemption that applies.
- 4.4 Job applicants should not be asked questions that might suggest an intention to discriminate on the grounds of a Protected Characteristic. For example, applicants should not be asked whether they are pregnant or planning to have children.
- 4.5 Before making a job offer, job applicants should not be asked about health or disability. However, there are limited exceptions that should only be used with the approval of the HR Department. For example:
 - Questions necessary to establish if an applicant can perform an intrinsic part of the job (subject to any reasonable adjustments).
 - Questions to establish if an applicant is fit to attend an assessment or if any reasonable adjustments are needed at the interview or assessment.
 - Positive action to recruit disabled persons.
 - Equal opportunities monitoring (which will not form part of the selection or decision-making process).

- Where necessary, job offers can be made conditional on a satisfactory medical check.

- 4.6 We are required by law to ensure that all employees are entitled to work in the UK. Assumptions about immigration status should not be made based on appearance or apparent nationality. All prospective employees, regardless of nationality, must produce original documents (such as a passport) to satisfy current immigration legislation before employment starts. The list of acceptable documents is available from the HR Department.
- 4.7 To ensure that this policy is operating effectively and identify groups that may be underrepresented or disadvantaged in our organisation, we monitor applicants' ethnic group, gender, disability, sexual orientation, religion, and age as part of the recruitment procedure. Provision of this information is voluntary and will not adversely affect an individual's chances of recruitment or any other decision related to their employment. The information is removed from applications before shortlisting and kept in an anonymised format solely for the purposes stated in this policy. Analysing this data helps us take appropriate steps to avoid discrimination and improve equality and diversity.

5. TRAINING AND PROMOTION AND CONDITIONS OF SERVICE

- 5.1 Training needs will be identified through regular appraisals. As a result, you will be given appropriate access to training to enable you to progress within the organisation, and all promotion decisions will be made based on merit.
- 5.2 Workforce composition and promotions will be regularly monitored to ensure equality of opportunity at all levels of the organisation. Where appropriate, steps will be taken to identify and remove unjustified barriers and to meet the special needs of disadvantaged or underrepresented groups.
- 5.3 Our conditions of service, benefits and facilities are reviewed regularly to ensure that they are available to all of you who should have access to them and that there are no unlawful obstacles to accessing them.

6. TERMINATION OF EMPLOYMENT

- 6.1 We will ensure that disciplinary procedures and penalties are applied without discrimination, resulting in disciplinary warnings, dismissal or other disciplinary action.

7. DISABILITIES

- 7.1 If you are disabled or have become disabled, we encourage you to tell us about your condition to support you as appropriate.
- 7.2 If you experience difficulties at work because of your disability, you may wish to contact your Line Manager/SLT or the Trusts HR Department to discuss any reasonable adjustments that would help

overcome or minimise the difficulty. Your Line Manager/SLT may wish to consult with you and your medical adviser about possible adjustments. We will consider the matter carefully and try to accommodate your needs within reason. If we consider a particular adjustment would not be reasonable, we will explain our reasons and find an alternative solution where possible.

- 7.3 We will monitor the physical features of our premises to consider whether they might place anyone with a disability at a substantial disadvantage. Then, where necessary, we will take reasonable steps to improve access.

8. PART-TIME AND FIXED-TERM WORK

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

9. BREACHES OF THIS POLICY

- 9.1 We take a strict approach to breaches of this policy, which will be dealt with in accordance with our Disciplinary Procedure. Serious cases of discrimination may amount to gross misconduct resulting in dismissal.
- 9.2 If you believe that you have suffered discrimination, you can raise the matter through our Grievance Procedure or our Anti-harassment and Bullying Policy as appropriate. Complaints will be treated in confidence and investigated as appropriate.
- 9.3 There must be no victimisation or retaliation against staff who complain about discrimination. However, making a false allegation deliberately or in bad faith may be treated as misconduct and dealt with under our Disciplinary Procedure.

10. RELATED POLICIES

- 10.1 The following other policies and procedures support this policy:
- Anti-Harassment and Bullying Policy.
 - Grievance Procedure.
 - Disciplinary Procedure.
 - Flexible Working Procedure.
 - Maternity, Paternity, Adoption and Shared Parental Leave Policies.

- Parental Leave Policy.
- Time Off for Dependants Policy.
- Dress Code.
- Career Break Policy.