BIG CREATIVE ACADEMY
CLIFTON AVENUE
WALTHAMSTOW
LONDON, E17 6HL

TEL: 020 8498 3300
WWW.BIGCREATIVE.EDUCATION

PRINCIPAL: SACHA CORCORAN MBE

EQUAL OPPORTUNITIES, DIVERSITY AND INCLUSION POLICY

Updated September 2026
Approved by the Principal

1. Policy Statement

Big Creative Academy is committed to promoting and achieving equality, diversity and inclusion (sometimes referred to as EDI). The Academy is committed to fostering an inclusive culture where diversity is valued, individual differences are respected and all members of the Academy community feel a sense of belonging. The Academy recognises neurodiversity, including autism, ADHD, dyslexia, dyspraxia and other cognitive differences, as a valuable aspect of diversity and is committed to ensuring appropriate support and reasonable adjustments where required.

This means:

- **equality**: providing equal opportunities and fairness for all employees, workers and job applicants, and eliminating unlawful discrimination;
- **diversity**: recognising, respecting and valuing the differences in our people's protected characteristics, backgrounds, skills and experience and encouraging gender diversity, age diversity, ethnic diversity, diverse physical ability and neurodiversity in our workforce;
- **inclusion**: ensuring a workplace culture that is fair and safe for all staff, that values our differences and enables each person to be themselves, achieve their potential and thrive at work.

We will not unlawfully discriminate against any employee, worker or job applicant because of any 'protected characteristic' recognised by current legislation, namely:

1. age;
2. disability;
3. gender reassignment;
4. marriage or civil partnership status;
5. pregnancy and maternity;
6. race (including colour, nationality and ethnic or national origin);
7. religion or belief;
8. sex; or
9. sexual orientation.

In addition, we will not treat any employee, worker or job applicant less favourably because:

- they are (or are not) a trade union member;
- they work part-time or on a fixed-term basis;
- of their socio-economic background; and/or
- they have caring responsibilities.

2. Scope of this Policy

The Policy Statement above sets out our commitment to ensuring that all staff and job applicants have equal opportunities. The remainder of this document sets out our policy on equality, diversity and inclusion, in particular:

- what we regard as acceptable behaviour at work, and what is not acceptable;
- the rights and responsibilities of those to whom the policy applies;
- the procedure for dealing with concerns or complaints;
- how we will deal with any breach of this policy;
- how it will be implemented, monitored and reviewed.

This policy *reflects our current practices and* applies to every individual working for us irrespective of their status, level or grade. It therefore includes the Principal, members of the Senior Leadership Team, governors, directors, trustees, employees, consultants, trainees, volunteers, home-workers, part-time or fixed-term employees, casual and agency staff (collectively referred to as "Staff" in this policy) *who are advised to familiarise themselves with its content*.

All Staff are responsible for ensuring that there is no discrimination in the workplace, as outlined in the policy statement set out above, and for ensuring that this policy is applied on a day-to-day basis. Staff should report any concerns relating to discrimination, harassment, victimisation or exclusionary behaviour through the appropriate Academy procedures. We expect all staff to apply the principles of equal opportunities and non-discrimination in their interactions with parents, carers, students, contractors, suppliers and visitors. Staff are expected to promote inclusive behaviours and use respectful and appropriate language in all interactions with colleagues, learners, parents, carers, contractors and visitors. We expect you to take personal responsibility for following, promoting and upholding this policy. In certain circumstances, an employee can be personally liable for discrimination against a fellow employee or a job applicant.

This policy should be read in conjunction with our separate Anti-Harassment and Bullying Policy. This policy does not form part of any employee's terms and conditions of employment and is not intended to have contractual effect. It is provided for guidance to all members of staff at the Academy who are required to familiarise themselves and comply, with its contents. We reserve the right to amend this policy at any time.

3. Aim of this Policy

We aim to create a working environment in which all individuals are able to make best use of their skills, free from discrimination, harassment and victimisation, and in which all decisions are based on merit. We do not discriminate against Staff on the basis of their sex, sexual orientation, marital or civil partnership status, pregnancy or maternity, gender reassignment, race (which includes colour, nationality, ethnic or national origin), religion or belief, disability or age (the protected characteristics).

The Academy recognises that individuals may experience discrimination based on a combination of protected characteristics and is committed to addressing all forms of discrimination, harassment and victimisation.

We will meet our statutory obligations under relevant legislation including the Equality Act 2010, which prohibits discrimination, harassment, sexual harassment and victimisation in employment. This policy conforms to the Equality Act 2010 and is monitored to ensure compliance with the requirements of the relevant legislation in force from time to time.

All Staff must set an appropriate standard of behaviour, lead by example and ensure that those they manage adhere to this policy and promote our aims and objectives with regard to equal opportunities and diversity. Staff will be given appropriate training on equal opportunities awareness and equal opportunities for recruitment and selection best practice. We will not tolerate behaviour that goes against the terms, spirit and/or aims of this policy, and where an employee is alleged to have breached this policy, they will be subject to our disciplinary procedure. Disciplinary action will be taken against any employee who is found to have breached this policy. Serious breaches of this policy, acts of unlawful discrimination and serious incidents of harassment and bullying will be treated as gross misconduct. We will never victimise anyone who makes a legitimate complaint to us about harassment or discrimination, or anyone who supports a colleague in their complaint. However, unwarranted allegations that are not made in good faith may be considered as a disciplinary matter.

Any questions about the content or application of this policy should be referred to HR in the first instance.

This policy applies to all aspects of our relationship with Staff and to relations between Staff members at all levels. This includes:

- job advertisements;
- recruitment and selection;
- training and development;
- opportunities for promotion;
- conditions of service;
- pay and benefits;
- conduct at work;
- capability, disciplinary and grievance procedures; and
- termination of employment.

We will take appropriate steps to accommodate the requirements of different religions, cultures, and domestic responsibilities.

4. Forms of Discrimination

Discrimination by or against a member of staff is generally prohibited unless there is a specific legal exemption. We do not tolerate any form of discrimination. Discrimination may be direct or indirect or fall within other prohibited conduct, and it may occur intentionally or unintentionally. Discrimination may take the form of:

a) **Direct discrimination** occurs when someone is treated less favourably **because of** one or more of the protected characteristics set out above. For example, rejecting an applicant on the grounds of their sex or race because they would not “fit in” would be direct discrimination. It also includes:

- **Direct discrimination by association** - treating someone less favourably because they are associated with someone who has a protected characteristic, e.g. because they have a disabled child; and
- **Direct discrimination by perception** - treating someone less favourably because they are perceived to have a protected characteristic, even if they do not, e.g. because the person thinks they have the protected characteristic of gender reassignment or sexual orientation.

b) **Indirect discrimination** occurs when someone is disadvantaged by an unjustified provision, criterion or practice that also puts other people with the same protected characteristic at a particular disadvantage. For example, a requirement to work full time puts women at a particular disadvantage because they generally have greater childcare commitments than men.

Such a requirement will be discriminatory unless it can be objectively justified. It also covers people who do not hold the protected characteristic but who suffer substantively the same disadvantage due to the "provision, criterion or practice" as those with that protected characteristic.

c) **Harassment** related to the protected characteristics of age, disability, gender reassignment, race (including colour, nationality and ethnic or national origin), religion or belief, sex and sexual orientation is prohibited. In addition, sexual harassment is also prohibited. Harassment is unwanted conduct that has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. It may also occur where someone harasses the victim, the victim either rejects or submits to the harassment and, because of that rejection or submission, that person then treats the victim less favourably. It can take place:

- in any work situation;
- during any situation related to work such as at a social event with colleagues, work trips, school visits etc;
- against a colleague or other person connected to the employer outside of a work situation, including on social media; or
- against anyone outside of a work situation where the incident is relevant to their suitability to carry out the role

Harassment is dealt with further in our Anti-Harassment and Bullying Policy.

d) **Victimisation** is also prohibited. This is less favourable treatment of someone who has complained or given information about discrimination or harassment or supported someone else's complaint.

e) **Discrimination arising from disability** - this is unfavourable treatment of the disabled person because of something arising in consequence of their disability. Such treatment is unlawful unless it can be objectively justified;

f) **Failure to make reasonable adjustments** - this applies in the context of disability only and an employer has a legal obligation to make reasonable adjustments to minimum certain disadvantages suffered by a disabled employee or job applicant.

7. Recruitment and Selection

We aim to ensure that no job applicant suffers discrimination because of any of the protected characteristics as mentioned above. Our recruitment procedures are reviewed regularly to ensure that individuals are treated based on their relevant merits and abilities. Job selection criterions are regularly reviewed to ensure that they are relevant to the job and are not disproportionate.

Job advertisements will avoid using wording that may discourage particular groups from applying. A short policy statement on equal opportunities and a copy of this policy shall be sent on request to those who enquire about vacancies.

We will 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 the Academy.

We will apply the following criteria:

- selection tests should be specifically related to job requirements and should measure the person's actual or inherent ability to do or train for the work;
- selection tests will be reviewed regularly to ensure they remain relevant and free from any unjustifiable bias, either in content or in scoring mechanism;
- all applications will be processed in the same way and the same questions asked at interview;
- we will keep written records of interviews and reasons for appointment and non-appointment, in accordance with our Data Protection Policy
- we will ensure that questions at interview relate to the requirements of the job; and
- decisions regarding the method of recruitment or selection or who is recruited or selected should only be made by a person who has read and understood this policy and undergone relevant training.

Applicants will not be asked about health or disability before a job offer is made. There are limited exceptions which we may use, 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 any reasonable adjustments that may be needed at interview or assessment;
- positive action to recruit disabled persons; and
- equal opportunities monitoring (which will not form part of the decision-making process).

Applicants will not be asked about past or current pregnancy or future intentions related to pregnancy. Applicants will not be asked about matters concerning age, race, religion or belief, sexual orientation, or gender reassignment without first considering whether such matters are relevant and may lawfully be considered.

We are required by law to ensure that all members of Staff are entitled to work in the UK. Assumptions about immigration status will not be made based on appearance or apparent nationality. All prospective members of Staff, regardless of nationality, must be able to produce the requisite original documents or satisfy the necessary online checks, before employment starts, to satisfy current immigration legislation. A list of acceptable documents is available from HR.

To ensure that this policy is operating effectively, and to identify groups that may be underrepresented or disadvantaged in the Academy, we will monitor applicants' ethnic group, gender identity, marital or civil partnership status, disability, sex, sexual orientation, religion or belief as part of the recruitment procedure. Provision of this information is voluntary, and it will not adversely affect an individual's chances of recruitment, or any other decision related to their employment. The information will be removed from applications before shortlisting and kept in an anonymised format solely for the purposes stated in this policy. Analysing this data helps us to take appropriate steps to avoid discrimination and improve equality, diversity and inclusion.

The Academy will make reasonable adjustments throughout the recruitment process to ensure that applicants are not disadvantaged because of a disability. Recruitment materials, job descriptions and advertisements will be regularly reviewed to promote inclusive language and reduce barriers to employment. Selection decisions will be based solely on merit, skills, qualifications and suitability for the role. Where practicable, recruitment processes will be periodically reviewed to identify and remove barriers that may disadvantage underrepresented groups.

8. Recruitment of Applicants with a Criminal Record

The Academy is an organisation that uses the Disclosure and Barring Service (DBS) to assess candidates' suitability for positions of trust working in an environment with children or vulnerable adults. We fully comply with the DBS Code of Practice and endeavours to treat all candidates fairly.

We endeavour not to discriminate unlawfully against any candidate who is required to provide information (a check) through this process. Having a criminal record will not necessarily prevent a candidate from working with the Academy. Whether or not it does will depend on the nature of the position and the circumstances and background of the offence(s).

Our policy on the recruitment of those with a criminal record will be made available to all candidates at the outset of the recruitment process. We will ensure that it makes any candidate who is subject to a check aware of the DBS Code of Practice and will provide a copy of the Code on request.

As a DBS check is part of our recruitment process, we encourage all candidates called to interview to provide details of any criminal record (except cautions and convictions which are "protected" (as defined in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (Amendment) (England and Wales) Order 2013 and 2020) at an early stage of the application process. We request that this information is sent under separate, confidential, cover to a designated person within the Academy, who may vary depending on the nature of the post being recruited. We guarantee that only those who need to see this information as part of the recruitment process will see it.

We will ensure that it discusses with the candidate the relevance of any offence to the job in question. A candidate's failure to reveal information directly relevant to the job may result in an offer of employment being withdrawn.

9. Staff Training, Promotions and Conditions of Service

Staff training and development needs will be identified through regular performance, development and wellbeing conversations, one-to-one meetings and ongoing discussions between employees and managers.

All Staff will be given appropriate access to training to enable them to progress within the Academy and all promotion decisions will be on the basis of merit.

The Academy is committed to supporting continuous professional development and creating opportunities for employees to develop their skills, knowledge and career aspirations throughout their employment.

The composition and movement of Staff at different levels will be reviewed from time to time to ensure equality of opportunity at all levels within the Academy.

Where appropriate, we will take steps to identify and remove unnecessary or unjustifiable barriers and provide appropriate facilities and conditions of service to meet the special needs of disadvantaged or under-represented groups.

The conditions of service, benefits and facilities that we provide will be reviewed from time to time to ensure that they are available to all Staff who should have access to them and that there are no unlawful obstacles to accessing them.

10. Grievances, disciplinary procedures, dismissals and redundancies.

Workers who, in good faith, bring a grievance (or assist another to do so) either under this policy or otherwise in relation to an equality or equal opportunities matter will not be disciplined, dismissed or otherwise suffer any adverse treatment for having done so.

No member of a particular group of workers will be disciplined or dismissed for performance or behaviour which would be overlooked or condoned in another group, unless there is genuine and lawful justification for different treatment.

We will ensure that redundancy criteria and procedures are fair and objective and are not directly or indirectly discriminatory. The provision of any voluntary redundancy benefits will be equally available to all employees unless there is a genuine and lawful justification for doing otherwise.

We will also ensure that absence, capability and disciplinary procedures and penalties are applied without discrimination and are carried out fairly and uniformly for all Staff, whether they result in formal warnings, dismissal or other action.

11. Considerations relating to disability

If a member of Staff is disabled or becomes disabled, in the course of their employment with the Academy, they are encouraged to tell us about their condition. This is to enable us to support the member of Staff appropriately.

The Academy recognises that some disabilities, medical conditions and neurodivergent conditions may not be visible and encourages staff to seek support if workplace adjustments may assist them in undertaking their role.

If a member of Staff experiences difficulties at work because of their disability, they may wish to contact their Line Manager/Head of Department to discuss any reasonable adjustments to their working conditions or duties which they consider to be reasonable and necessary, or which would assist in the performance of their duties.

The Line Manager may wish to consult with the member of Staff and their medical adviser(s) about possible adjustments. Careful consideration will be given to any such proposals, and they will be accommodated where reasonable, practicable and proportionate in all the circumstances of the case.

Nevertheless, there may be circumstances where it would not be reasonable for us to accommodate a particular adjustment and in such circumstances, it will ensure that it provides the member of Staff with its reasons and will try to find an alternative solution where possible.

We will monitor the physical features of its premises to consider whether they place disabled Staff, job applicants or service users at a substantial disadvantage compared to other Staff. Where reasonably practicable and proportionate, we will take steps to improve access for disabled Staff and service users.

12. Fixed-Term Employees and Agency Workers

We will monitor our use of fixed-term employees and agency workers, and their conditions of service to ensure they are being offered appropriate access to benefits, training, promotion and permanent employment opportunities. We will also, where relevant, monitor their progress to ensure that they are accessing permanent vacancies.

13. Part-Time Workers

We will monitor the conditions of service of part-time employees and their progression to ensure that they are being offered appropriate access to benefits and training and promotion opportunities. We will also ensure that requests to alter working hours are dealt with appropriately under our Flexible Working Policy.

14. Prevention of Sexual Harassment

The Academy is committed to taking all reasonable steps to prevent sexual harassment and creating a working environment where all individuals are treated with dignity and respect.
Allegations of sexual harassment will be taken seriously, investigated promptly and addressed in accordance with the Academy's policies and procedures.
The Academy will provide training, awareness raising and preventative measures to minimise the risk of harassment occurring.

15. Complaints of Discrimination, Victimisation and Harassment on the Protected Characteristics or Sexual Harassment

We will treat all complaints of discrimination, sexual harassment, harassment or victimisation related or connected to any of the protected characteristics made by its staff, students or third parties seriously and will take action where appropriate.

If you believe you have been unfairly treated in breach of this policy, you should follow our Grievance Procedure, which is available from HR or via the staff shared area.

If you believe you may have been harassed, bullied or victimised, please refer to our Anti-Harassment and Bullying policy which sets out the procedure you should follow.

Complaints of this nature will be dealt with seriously, in confidence and as soon as possible and will be investigated in accordance with the relevant procedure. The member of Staff will be given the opportunity to respond to the allegation and provide an explanation for their actions.

Staff who make such allegations in good faith will not be victimised or treated less favourably as a result. If we conclude that the allegations have been made maliciously or in bad faith, we will deal with the matter in accordance with our Disciplinary Policy and Procedure. Any member of Staff who is found to have committed an act of discrimination, harassment, bullying or victimisation will be subject to disciplinary action. Such behaviour may constitute gross misconduct and, as such, may result in summary dismissal. We take a strict approach to serious breaches of this policy.

The Academy takes allegations of discrimination, harassment, victimisation and sexual harassment seriously and will investigate complaints promptly. The Academy is committed to taking reasonable and proactive steps to prevent discrimination, harassment and sexual harassment from occurring. The Academy will periodically review workplace practices, employee feedback, training arrangements and organisational culture to identify and mitigate risks relating to harassment, inappropriate conduct and discriminatory behaviour. Appropriate training, awareness raising and preventative measures will be implemented to support a safe, respectful and inclusive working environment.

16. How we monitor whether this Policy is working

We undertake equal opportunities monitoring as part of our recruitment processes. Further information is contained in our Safer Recruitment Policy and Application Form.

We may record and analyse information about equal opportunities within the workplace, and when you join us, you give us consent to gather and process this data about you. We use the information to make sure this Policy works properly and to refine it. We may also use the information to review the composition of our workforce and to promote workplace equality. Workforce and recruitment data may be periodically reviewed, where lawful and appropriate, to identify trends, support equality objectives and inform future inclusion initiatives. All data will be stored and processed in line with our Data Protection Policy and Privacy Notice.

HR will monitor the outcomes of any complaints raised under this Policy to note any patterns of behaviour and to assess the quality of investigations. We will use the information gathered to focus training, development and awareness needs appropriately.