



Vita et Pax Preparatory School
Established 1936

Equal Opportunities Policy

Policy Originator	Head Teacher
Last Reviewed	26 August 2026 (full rebuild). The previous version was reviewed on 24 March 2025.
Review Period	Every 3 years, with annual minor reviews
Next Full Review	Within three years of the date above, or earlier on any material change in legislation or statutory guidance
Status	Non-statutory; supports the school's duties under Part 6 of the Equality Act 2010 and the Independent School Standards

1. Purpose and Scope

Vita et Pax Preparatory School is committed to a supportive, inclusive and respectful environment for every pupil, member of staff, parent and visitor. We value diversity, promote equality of opportunity and work to remove barriers to inclusion. This commitment flows from the school's Catholic ethos and from our name: a school of life and peace is one in which every person is recognised as being of equal worth.

The policy applies across the whole school, from Little Vitas and the Early Years Foundation Stage (EYFS) to Year 6, and to everything done in the school's name, including trips, clubs, wraparound care and online provision. It binds pupils and applicants, staff, volunteers, the Governing Body and contractors, and sets the standard expected of parents and visitors. Its aims are to:

- State the school's commitment to promoting equality and preventing discrimination.
- Ensure compliance with equality legislation, in particular the Equality Act 2010.
- Foster an environment in which every individual is treated with dignity and respect.
- Identify and eliminate discrimination, harassment, victimisation and prejudice-based bullying.
- Ensure equality monitoring data is handled lawfully, in line with the Data Protection Policy.

2. Legal Framework

Vita et Pax is an independent school, and not every equality duty that binds a state-funded school binds this one. This section states the position accurately rather than generically.

2.1 Part 6 of the Equality Act 2010 — duties that do apply

Part 6, Chapter 1 of the Equality Act 2010 governs schools and applies to independent schools; for an independent educational institution the 'responsible body' on whom the duties fall is the proprietor (section 85). Under section 85 the school must not discriminate against, harass or victimise a person in its admission arrangements, in the terms on which it offers admission, or by refusing admission; nor, in relation to a pupil, in the way it provides education or affords access to any benefit, facility or service, by withholding either, by excluding the pupil, or by subjecting the pupil to any other detriment.

Three limits should be understood. Section 84 provides that Chapter 1 does not apply to age or to marriage and civil partnership, so these are not engaged in relation to pupils, though both apply fully to staff under Part 5. Section 89(2) provides that nothing in the Chapter applies to the content of the curriculum — what is taught sits outside the Act, but how it is delivered, and access to it, do not. Section 85(10) disapplies gender reassignment, religion or belief and sexual orientation from the harassment provision protecting pupils; such conduct may still be unlawful direct discrimination, and the school treats it in every case as a serious breach of this policy.

2.2 The Public Sector Equality Duty — a duty that does not apply

The Public Sector Equality Duty (PSED) in section 149 of the Act binds public authorities and others exercising public functions. Keeping Children Safe in Education 2026 confirms at paragraph 99 that compliance with the PSED is a legal requirement for state-funded schools and colleges. Vita et Pax is an independent school and is not subject to the PSED. That does not make the school indifferent to the duty's objectives. As a matter of the school's own approach rather than legal obligation — and not by any resolution of the Governing Body — the school has regard to eliminating discrimination, advancing equality of opportunity and fostering good relations when taking significant decisions.

2.3 Employment — Part 5 of the Equality Act 2010

As an employer the school is bound by Part 5 of the Act, covering recruitment, terms of employment, promotion, training, dismissal and any other detriment. Unlike the schools provisions in Part 6, the employment provisions engage all nine protected characteristics, including age and marriage and civil partnership.

2.4 Other legislation and guidance

- The Education (Independent School Standards) Regulations 2014.
- The Children and Families Act 2014 and the SEND Code of Practice: 0 to 25 years (2015).
- The Statutory Framework for the Early Years Foundation Stage — the edition for group and school-based providers applying from 1 September 2026.
- Keeping Children Safe in Education 2026, paragraphs 90–94 and 99–101.
- Working Together to Safeguard Children 2026.
- The EHRC's Technical Guidance for Schools in England. A revised edition was consulted on during 2026; this policy will be reviewed against it once published.
- The UK GDPR and the Data Protection Act 2018.

3. Protected Characteristics and Prohibited Conduct

Section 4 of the Equality Act 2010 lists nine protected characteristics: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race (including colour, nationality and ethnic or national origins); religion or belief (including lack of belief); sex; and sexual orientation. All nine apply to the school as an employer; age and marriage and civil partnership are not engaged in relation to pupils. Protection also covers discrimination by association and by perception. The conduct below is prohibited by the Act and unacceptable at Vita et Pax, whoever it is directed at.

Conduct	What it means	Example
Direct discrimination (s.13)	Less favourable treatment because of a protected characteristic.	Declining an application because of a child's ethnic origin.
Indirect discrimination (s.19)	A provision, criterion or practice that puts people sharing a characteristic at a particular disadvantage and cannot be objectively justified.	An unjustified uniform rule that disadvantages pupils of a particular faith.
Discrimination arising from disability (s.15)	Unjustified unfavourable treatment because of something arising from a disability.	Sanctioning a pupil for behaviour that is a manifestation of their disability.
Failure to make reasonable adjustments (ss.20–21)	Not taking reasonable steps to avoid a substantial disadvantage to a disabled person.	Withholding an auxiliary aid a disabled pupil needs to access a lesson.
Harassment (s.26)	Unwanted conduct related to a protected characteristic that violates dignity or creates an intimidating, hostile, degrading or offensive environment.	Racially charged 'banter' directed at a pupil or member of staff.
Victimisation (s.27)	Subjecting a person to a detriment because they made or supported a complaint under the Act.	Treating a family less favourably after they raise a complaint.

Positive action. The Act permits proportionate positive action to address a particular disadvantage, need or under-representation connected with a protected characteristic, as Keeping Children Safe in Education 2026 confirms at paragraph 93. Where monitoring identifies a group experiencing particular disadvantage, the Head Teacher will consider whether such action is appropriate. It is not positive discrimination, which remains unlawful.

4. Disability, Reasonable Adjustments and Accessibility

A person is disabled for the purposes of the Act if they have a physical or mental impairment with a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. A child needs no formal diagnosis, Education, Health and Care Plan or place on the SEND register to be disabled in law.

The school has an anticipatory and continuing duty to make reasonable adjustments for disabled pupils. Schedule 13 sets out how that duty applies to schools: by paragraph 2(2) the responsible body must comply with the first requirement (changing a provision, criterion or practice that puts a disabled pupil at a substantial disadvantage) and the third requirement (providing an auxiliary aid or service). The second requirement, concerning alterations to physical features, is not part of that duty. That exclusion is specific to the duty owed to pupils under Part 6 and does not extend to the school's other capacities. As an employer the school must comply with the first, second and third requirements (Schedule 8, paragraph 2(1)), and as a service provider it must do the same (Schedule 2, paragraph 2(1)). Disabled employees, job applicants and members of the public are therefore owed reasonable adjustments to physical features, as sections 2.3 and 8 of this policy reflect.

Physical accessibility for pupils is addressed instead through the accessibility plan required by paragraph 3 of Schedule 10, which applies to independent schools. The school's Accessibility Plan is a three-year plan covering the three matters Schedule 10 requires: increasing disabled pupils' participation in the curriculum; improving the physical environment so they can better take advantage of the education, benefits, facilities and services provided; and improving the delivery of information to them in a form readily accessible to pupils who are not disabled.

Adjustments are identified with the child and their family and, where appropriate, external professionals, then recorded and reviewed through the school's SEND processes. What is 'reasonable' is judged case by case. Vita et Pax is not on the section 41 list of approved independent institutions and receives no notional SEN funding; as the Admissions and SEND Policies explain, this limits the school's capacity to meet high or complex needs. Where the school cannot meet a need it says so honestly and early rather than promising provision it cannot deliver. Staff are also trained on the additional safeguarding barriers faced by children with SEND, which Keeping Children Safe in Education 2026 sets out at paragraphs 247 to 249 — among them a greater risk of prejudice-based bullying, and the risk that indicators of abuse are wrongly attributed to a child's condition.

5. Admissions

The admissions process is inclusive and non-discriminatory. The school welcomes applications from all children regardless of race, nationality, ethnic or national origin, religion or belief, disability, sex, gender reassignment or socio-economic background, and each application is considered on its merits in accordance with the school's ethos and its capacity to meet the child's needs. Parents are asked to disclose any disability or special educational need at application so that adjustments can be considered properly and in good time; disclosure is used to make provision, never to disadvantage an applicant. Means-tested bursaries are available to families facing financial hardship.

6. Educational Provision and the Curriculum

The school provides equal access to education, facilities and services, adapting provision to the needs of its pupils. In practice we:

- Hold consistently high expectations of every child.
- Provide targeted support for pupils with English as an additional language and for those with an Education, Health and Care Plan or identified special educational needs.
- Deliver a curriculum and extra-curricular programme reflecting a range of cultures, faiths and family structures, with resources that challenge stereotypes.
- Act swiftly and visibly against discriminatory behaviour rather than treating it as low-level.
- Work with families and external agencies, and review the effectiveness of our inclusive practice rather than assuming it.

The fundamental British values of democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs are promoted through the curriculum, assemblies and PSHE.

7. Religion and Belief

The school's ethos is founded on Catholic values, and Catholic life, prayer and celebration are a genuine and visible part of the school day. The school also warmly welcomes and educates children of all faiths and of none, and supports the freedom of every member of the community to hold and practise their own beliefs.

The school does not apply a religious test in admissions and does not require families to share the Catholic faith. The Equality Act contains limited exceptions permitting schools with a religious character or ethos to act in certain ways in relation to religion or belief; the school does not rely on them in admissions. Requests relating to religious observance, dress, dietary requirements or withdrawal from collective worship are considered sympathetically and individually by the Head Teacher.

8. Staff, Recruitment and Training

Recruitment, terms and conditions, professional development, promotion and the handling of grievance and disciplinary matters are conducted without regard to any protected characteristic and in line with the Safer Recruitment Policy. Selection is on merit against the requirements of the role, and reasonable adjustments are made for disabled applicants and employees at every stage. All staff receive training on equality, diversity and anti-discrimination at induction, refreshed periodically. Staff are expected to model the behaviour this policy describes; equality cannot be delegated to a single lesson or a single member of staff.

9. The Early Years Foundation Stage

The EYFS statutory framework identifies equality of opportunity and anti-discriminatory practice, ensuring every child is included and supported, as one of the things the EYFS seeks to provide. Paragraph 3.30 requires providers to follow their legal responsibilities under the Equality Act 2010, including the fair and equal treatment of practitioners regardless of any of the nine protected characteristics; paragraph 3.77 requires arrangements to support children with special educational needs and disabilities. In Little Vitas, Nursery and Reception the policy is applied through inclusive planning for each child, resources and stories reflecting diverse cultures and families, and prompt, age-appropriate challenge to discriminatory language.

10. Bullying, Harassment and Prejudice-Based Incidents

Prejudice-based bullying — including racist, faith-based, disablist, sexist, homophobic, biphobic and transphobic incidents, and sexual harassment — is never dismissed as banter. Keeping Children Safe in Education 2026 notes at paragraph 101 that some pupils are at greater risk of harm from these behaviours, and at paragraph 100 that good record-keeping and monitoring of all forms of abuse and harassment is essential. Such incidents are recorded centrally, analysed for patterns and reported to the Governing Body. Where an incident raises a safeguarding concern it is referred to the Designated Safeguarding Lead under the Child Protection and Safeguarding Policy; the response to individual incidents is set out in the Anti-Bullying Policy and the Behaviour and Discipline Policy.

Online discrimination, cyberbullying and harassment are addressed through the curriculum and through technical measures. NeuralShield, the school's filtering and monitoring system, blocks and flags

discriminatory and extremist content, and alerts are acted on by the Designated Safeguarding Lead.

11. Equality Monitoring and Data Protection

The school collects limited personal data for equality monitoring so that it can identify inequalities it would not otherwise see. Most of this is special category data under the UK GDPR: it is collected for a specified purpose, held securely, retained no longer than necessary and accessed only by those who need it. Monitoring data is reported in aggregate only; individuals are never identified, and small-number groups are suppressed.

The condition the school relies on for the special category element of this processing is stated here because it is specific to equality monitoring and is not among the conditions listed in the school's privacy notices. It is the substantial public interest condition at paragraph 8 of Part 2 of Schedule 1 to the Data Protection Act 2018 (equality of opportunity or treatment), read with Article 9(2)(g) of the UK GDPR: processing that is necessary for identifying or keeping under review the existence or absence of equality of opportunity or treatment between groups of people, with a view to enabling such equality to be promoted or maintained. The condition covers data on racial or ethnic origin, religious or philosophical beliefs, health and sexual orientation. It does not permit processing for the purpose of measures or decisions about a particular individual, and it ceases to be available in respect of a person who gives the school written notice requiring it to stop processing their data for this purpose. Reliance on a Schedule 1 Part 2 condition requires the data controller to have an Appropriate Policy Document in place covering the processing; the school's Appropriate Policy Document is held by the Data Protection Lead and is available on request. General Article 6 lawful bases, retention periods and data subject rights are set out in the Data Protection Policy and the associated privacy notices.

12. Raising a Concern, Complaints and Breaches

Any pupil, parent, member of staff or visitor who believes they have experienced or witnessed discrimination, harassment or victimisation should raise it. Pupils should speak to any member of staff they trust; staff and parents should raise concerns with the Head Teacher. Concerns are investigated proportionately and responded to, and a person raising a genuine concern will not be disadvantaged for doing so — victimisation of a complainant is itself a breach of this policy and of the Equality Act 2010. Where a concern is not resolved informally it should be pursued through the Complaints Policy. Concerns about a member of staff's conduct towards a child are dealt with under the Child Protection and Safeguarding Policy and the Low-Level Concerns Policy, and staff may also use the Whistleblowing Policy. Nothing here prevents a person from pursuing their statutory rights — a County Court claim for a pupil, or an Employment Tribunal claim for an employee.

Breaches by pupils are addressed under the Behaviour and Discipline Policy and the Anti-Bullying Policy, with sanctions applied proportionately and with regard to the age and understanding of the child and to any disability. Breaches by staff are addressed under the disciplinary procedure and may constitute gross misconduct; breaches by parents or visitors under the Parent Code of Conduct.

13. Related Policies, Monitoring and Review

Read this policy alongside the Anti-Bullying Policy, the Child Protection and Safeguarding Policy, the SEND Policy and the Accessibility Plan, together with the Admissions, Behaviour and Discipline, Online Safety, Data Protection, Safer Recruitment, Complaints and EYFS Policies.

The Head Teacher implements this policy and reports to the Governing Body on its effectiveness, including the pattern of recorded prejudice-based incidents and the outcomes of equality monitoring. Approval of this policy rests with the Governing Body, which also satisfies itself that the school is meeting its obligations under the Equality Act 2010. The policy is fully reviewed every three years, with minor reviews annually, and earlier on any material change in legislation or statutory guidance — including a new edition of Keeping Children Safe in Education, Working Together to Safeguard Children, the EYFS framework, or the EHRC's technical guidance for schools.