

## **The Mill Hill School Foundation**

**Walker House, Millers Close, The Ridgeway, Mill Hill,  
London NW7 1AQ**

**Mill Hill School**

**Belmont, Mill Hill Preparatory School**

**Grimsdell, Mill Hill Pre-Preparatory School**

**The Mount, Mill Hill International**

## **Equal Opportunities Policy**

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**Independent Co-educational Day School for Pupils aged 3 to 18  
years and Boarding School for Pupils aged 13 to 18 years**

**Effective March 2017**

## Key Points of the Equal Opportunities Policy

<b>Purpose</b>	<p>The aims of this policy are to:</p> <ul style="list-style-type: none"> <li>• communicate the commitment of the Foundation to the promotion of equal opportunities</li> <li>• promote equal treatment within the Foundation for all members of the Foundation Community</li> <li>• create and maintain an open and supportive environment which is free from discrimination</li> <li>• foster mutual tolerance and positive attitudes and for everyone to feel valued within the Foundation</li> <li>• ensure that no one is treated less favourably than any other person or victimised on any ground listed below under Responsibilities</li> <li>• make it clear that, and ensure, that all discriminatory words, behaviour and images are treated as unacceptable</li> <li>• take reasonable steps to avoid putting disabled people at a substantial disadvantage (the 'reasonable adjustment' duty)</li> <li>• ensure compliance with the Equality Act 2010 and the DfE Every Child Matters guidance.</li> </ul>
<b>Forms of Discrimination</b>	<p><b>Direct discrimination:</b> Direct discrimination occurs where someone is put at a disadvantage for a reason related to one or more of the grounds set out below under Responsibilities. For example, rejecting an applicant of one race because it is considered they would not "fit in" on the grounds of their race could be direct discrimination.</p> <p><b>Indirect discrimination:</b> Indirect discrimination occurs where an individual is subject to an unjustified provision, criterion or practice which puts them at a particular disadvantage because of, for example, their sex or race. For example, a minimum height requirement would be likely to eliminate proportionately more women than men. If these criteria cannot be objectively justified for a reason unconnected with sex, it would be indirectly discriminatory on the grounds of sex.</p>
<b>Responsibilities</b>	All members of the Foundation Community are expected to comply with this policy and therefore to treat others with dignity at all times without regard to their gender, marital/civil partnership status, race, disability, sexual orientation, gender reassignment, religious belief or age except where common decency and consideration dictate.
<b>Management</b>	Those working at a management level have a specific responsibility to set an appropriate standard of behaviour, to lead by example and to ensure that those they manage adhere to the policy and promote the aims and objectives of the Foundation with regard to equal opportunities.
<b>Complaints</b>	If you believe that you have received less favourable treatment on any of the unlawful grounds listed above, or if you feel that this policy has been breached in any way to your detriment you are encouraged to raise the matter through the Foundation's formal Complaint's Procedure. For a copy of the Foundation's Policy on the handling of concerns and complaints received from Parents and Pupils aged over 16 years, please contact the Head of Grimsdell, Belmont or Mill Hill. Allegations regarding potential breaches of this policy will be treated in confidence and investigated in accordance with the complaints procedure.
<b>Overall Responsibility</b>	The Court of Governors has overall responsibility for the effective operation of the Foundation's Equal Opportunities Policy and for ensuring compliance with the relevant statutory framework prohibiting discrimination. The Court of Governors has delegated day-to-day responsibility for operating the policy and ensuring its accessibility, availability, maintenance and review to the Director of Finance and Operations.

*The above Key Points are a synopsis and are not intended to replace the policy. The full policy must be read and followed in the event that it needs to be applied. If the Key Points are found to be in conflict with the wording of the full policy, the policy takes priority.*

# **The Mill Hill School Foundation**

## **Equal Opportunities Policy**

### **1 Introduction**

- 1.1 **The Mill Hill School Foundation Community:** The Mill Hill School Foundation (the ‘**Foundation**’) comprises four independent mainstream Schools which together educate girls and boys aged 3 to 18 years, namely the day schools of The Mount, Mill Hill International, Grimsdell, Mill Hill Pre-Preparatory School and Belmont, Mill Hill Preparatory School, and the boarding and day school of Mill Hill School. The Foundation is a registered charity with a Christian ethos and welcomes staff, workers, volunteers, pupils, parents, applicants and governors from all different social and economic backgrounds, ethnicities and linguistic, religious and cultural traditions.
- 1.2 **The Foundation's position:** The Foundation recognises the benefits of having a diverse Foundation Community, who value one another, and the different contributions everyone can make. The Foundation is committed to being an equal opportunities education provider and will take every possible step to ensure equality of opportunity for all members of the Foundation Community. In the provision of equal opportunities, the Foundation recognises and accepts its responsibilities under the law and opposes discrimination on the basis of gender, marital or civil partnership status, any gender reassignment, race, ethnic or national origin, disability, sexual orientation, religious belief and age. All policies and practices will conform with the principles of equal opportunities, equality and diversity. The Foundation Community shall not be disadvantaged by any policies or practices which cannot be justified as necessary for operational purposes.
- 1.3 **Related policies:** This Equal Opportunities Policy [the ‘**Policy**’] is in accordance with and must be read and applied in conjunction with all of the Foundation's (or each individual school’s) policies, including the Admissions Policy; Expectations and Standards or Behaviour Policy; Expulsion, Removal and Review Policy; School Rules and Uniform Policy, Anti-Bullying Policy, Disability Policy, Accessibility Plan and the Special Educational Needs and/or Disabilities Policy.

## 2 **Policy statement**

2.1 **Scope:** This policy applies to all members of the current, prospective and ex Foundation Community, as referred to at paragraph 1.1 above. This policy is however specific to current and prospective pupils and parents and runs alongside the Foundation's Employment Equal Opportunities Policy.

2.2 **Policy aims:** Through the operation of this policy we aim to:

- communicate the commitment of the Foundation to the promotion of equal opportunities
- promote equal treatment within the Foundation for all members of the Foundation Community
- create and maintain an open and supportive environment which is free from discrimination
- foster mutual tolerance and positive attitudes and for everyone to feel valued within the Foundation
- ensure that no one is treated less favourably than any other person or victimised on any ground listed at paragraph 1.2
- make it clear that, and ensure, that all discriminatory words, behaviour and images are treated as unacceptable
- take reasonable steps to avoid putting disabled people at a substantial disadvantage (the 'reasonable adjustment' duty)
- ensure compliance with the Equality Act 2010 and the DfE Every Child Matters guidance.

2.3 **Unlawful and unfair discrimination and victimisation** on the grounds listed at paragraph 1.2 above is unacceptable and will not be tolerated within the Foundation because:

- such conduct can be detrimental and harmful to the person who is discriminated or victimised against, and to those who engage in such behaviour, and those who support them
- in some situations, the Foundation may be at risk of being held responsible for the acts of individual members of the Foundation Community and therefore shall not tolerate any discriminatory practices or behaviour
- such conduct is contrary to all our aims and values, our internal culture and the reputation of the Foundation.

### **3 Forms of discrimination**

- 3.1 **Types:** Discrimination may be direct or indirect and it may occur intentionally or unintentionally.
- 3.2 **Direct discrimination:** Direct discrimination occurs where someone is put at a disadvantage for a reason related to one or more of the grounds set out in paragraph 1.2 above. For example, rejecting an applicant of one race because it is considered they would not "fit in" on the grounds of their race could be direct discrimination.
- 3.3 **Indirect discrimination:** Indirect discrimination occurs where an individual is subject to an unjustified provision, criterion or practice which puts them at a particular disadvantage because of, for example, their sex or race. For example, a minimum height requirement would be likely to eliminate proportionately more women than men. If these criteria cannot be objectively justified for a reason unconnected with sex, it would be indirectly discriminatory on the grounds of sex.

### **4 Admission**

- 4.1 **Applicants:** The Foundation accepts applications and admits pupils irrespective of their gender, gender reassignment, race, ethnic or national origin, disability, sexual orientation, religious belief or special educational needs and will not discriminate on these grounds in the terms on which a place is offered, subject to section 8, below. The Foundation will treat every application in a fair, open-minded way.
- 4.2 **Selection:** Every application will be considered on its merits within the Foundation's criteria for selection on grounds of the pupil's ability and aptitude, but this will not be done as a way of excluding pupils with special educational needs and/or disability, subject to section 8 below.
- 4.3 **Admissions Policy:** The Foundation's Admissions Policy reflects the Foundation's approach towards equal opportunities and is consistent with this Policy.

### **5 Education and associated services**

- 5.1 **Equal access:** The Foundation will afford all pupils equal access to all benefits, services, facilities, classes and subjects including all sports, irrespective of their gender, gender reassignment, race, ethnic or national origin, disability, sexual orientation, religious belief or special educational needs, subject to considerations of safety and welfare, paragraph 5.2 and section 8, below.

- 5.2 **Positive discrimination:** The Foundation may afford pupils of a particular racial group, or pupils with special educational needs and/or disability, access to additional education or training to meet the special needs of the pupils in that group, for example, special language training for groups whose first language is not English.
- 5.3 **Exclusions:** The Foundation will not discriminate against any pupil by excluding him or her from the Foundation, or by subjecting him or her to any other detriment, on the grounds of his or her gender, gender reassignment, race, ethnic or national origin, disability, sexual orientation, religious belief or special educational needs, subject to section 8 of this Policy.
- 5.4 **Teaching and Foundation materials:** Efforts are made to recognise and be aware of the possibility of bias (for example gender or racial), so that this can be eliminated in both the Foundation's teaching and learning materials and teaching styles. Materials are carefully selected for all areas of the curriculum so as to avoid stereotypes and bias. Teacher time, attention and all resources are given equally to all pupils.
- 5.5 **Pupil interaction:** All pupils are encouraged to work and play freely with, and have respect for, all other pupils, irrespective of their gender, gender reassignment, race, ethnic or national origin, disability, sexual orientation, religious belief or special educational needs, subject to considerations of safety and welfare. Positive attitudes are fostered towards all groups in society through the curriculum and ethos of the Foundation, and pupils will be encouraged to question assumptions and stereotypes.

## **6 Foundation uniform**

- 6.1 **The Uniform Policy** of each school within the Foundation is consistent with this Policy. Each school's policy on uniform applies equally rigorously to all pupils, irrespective of their gender, gender reassignment, race, ethnic or national origin, disability, sexual orientation, religious belief or special educational needs, subject to considerations of safety and welfare.
- 6.2 **Symbols of faith:** Certain items of jewellery, such as the Kara bangle, and certain items of headwear, such as the turban and headscarves, may be worn by pupils when doing so is genuinely based on manifesting religious or racial beliefs or identity. This is subject to considerations of safety and welfare and the Foundation's existing school Uniform Policy principles (in regards to, for example, the school colours). Where there is uncertainty as to whether an item may be worn under this section, the

issue must be referred by the pupil or his or her parents to the Head, whose decision will be final, subject to the Complaints procedure.

## **7 Religious belief**

7.1 **Religion:** The Foundation's religious ethos, services and school timetable are set in accordance with the Christian tradition but the Foundation respects the right and freedom of individuals to worship in accordance with other faiths, or no faith, subject always to their respecting the rights and freedoms of the Foundation Community as a whole and considerations of safety and welfare.

## **7.2 Special educational needs and/or disability**

**Our approach:** We are an inclusive Foundation which welcomes members of the Foundation Community with disabilities and special educational needs. We maintain and drive a positive culture towards inclusion of disabled people and those with special educational needs in all the activities of the Foundation and we will not treat a member of the Foundation Community less favourably on these grounds without justification. However, at present, our facilities, physical and otherwise, for the disabled and those with special educational needs are limited but we will do all that is reasonable to ensure that the Foundation's curriculum, ethos, culture, policies, procedures and premises are made accessible to everyone. Our 'Disability Policy' and 'Policy on Special Educational Needs' are consistent with this policy. For a copy of these policies please contact the School Office at either Grimsdell, Belmont or Mill Hill.

7.3 **Definitions:** Children have 'special educational needs' if they have a learning difficulty which calls for special educational provision to be made for them. A disability is a "physical or mental impairment which has a substantial, long-term, adverse effect on the ability to perform normal day-to-day activities" (Equality Act 2010). For further clarification please refer to the policies mentioned in paragraph 8.1 above.

7.4 **Informing the Foundation:** In accordance with the Foundation's Terms and Conditions, parents of pupils must notify the Head in writing if they are aware or suspect that the pupil (or prospective pupil) has a disability or if they (either parent), the pupil (or prospective pupil), or any close relations have at any time had, or has a learning difficulty. The registration form enables prospective parents to give details of their child's disability when applying for a place at one of the three Foundation schools. Parents must provide copies of all written reports and other

relevant information upon request. Providing the school with such information will enable the school to support the pupil as much as possible. Confidential information of this kind will only be communicated on a "need to know" basis.

- 7.5 **Admission of children with special educational needs and/or a disability:** Applications for a place at any of the Foundation schools will be considered on the basis that all 'reasonable adjustments' (see definition below) have been made by the school in order to cater for the child's special educational needs and/or disability. The school will not offer a place if, after all reasonable adjustments have been made, the school will not be able to provide adequately for the pupil's physical and educational needs. The school shall inform the parents of their decision and give details of the reasonable adjustments they are going to make or give reasons why an offer of a place has not been made.
- 7.6 **Existing pupils:** Where the Foundation becomes aware of special educational needs and/or disability of an existing pupil, the school will do all that is reasonable to assist the pupil whilst within the Foundation, which may include making 'reasonable adjustments'. Parents will be asked to withdraw the pupil, without being charged Fees in Lieu of Notice and with the Acceptance Deposit returned, if, in the professional judgement of the Head, and after consultation with the parents and the pupil (where appropriate), the Foundation cannot provide adequately for the pupil's physical and educational needs after all reasonable adjustments have been made. The Foundation will do what is reasonable to help parents to find an alternative placement which will provide their child with the necessary environment and level of teaching and support.
- 7.7 **Reasonable adjustments:** The Foundation has an on-going duty to make 'reasonable adjustments' for disabled pupils and pupils with special educational needs in respect of the education and associated services provided to ensure that such pupils are not placed at a substantial disadvantage in comparison with other pupils. This is a broad expression that covers all aspects of Foundation life, for example: the curriculum; classroom organisation and timetabling; access to Foundation facilities, clubs and visits; the schools' sports and other Foundation policies. Reasonable adjustments may typically include:
- making arrangements for a child in a wheelchair to attend an interview in an accessible ground floor room
  - allowing extra time for a dyslexic child to complete an entrance exam

- providing examination papers in larger print for a child with a visual impairment
- rearranging the timetable to allow a pupil to attend a class in an accessible part of the building
- arranging a variety of accessible sports activities

The Foundation is not legally required to make adjustments which include:

- physical alterations such as the provision of a stair-lift or new ground floor facilities, such as a new library
- auxiliary aids and services such as a loop for children with hearing aids; large LCD screen computers and disability trained classroom assistants.

If parents are willing to pay for auxiliary aids and services, the Foundation will carefully consider any proposals and will not unreasonably refuse any requests for such aids and services to be provided.

- 7.8 **Access:** The Foundation shall monitor the physical features of its premises to consider whether disabled users of the premises are placed at a substantial disadvantage compared to other users. Where possible and proportionate, the Foundation will take steps to improve access for disabled users of the premises. The Foundation has an Accessibility Plan, which is reviewed annually and is available on request from the Bursar.

## 8 Responsibilities

- 8.1 **All members of the Foundation Community** are expected to comply with this policy and therefore to treat others with dignity at all times without regard to their gender, marital/civil partnership status, race, disability, sexual orientation, gender reassignment, religious belief or age except where common decency and consideration dictate.
- 8.2 **Overall responsibility:** The Court of Governors has overall responsibility for the effective operation of the Foundation's Equal Opportunities Policy and for ensuring compliance with the relevant statutory framework prohibiting discrimination. The Court of Governors has delegated day-to-day responsibility for operating the policy and ensuring its accessibility, availability, maintenance and review to the Bursar.

8.3 **Management:** Those working at a management level have a specific responsibility to set an appropriate standard of behaviour, to lead by example and to ensure that those they manage adhere to the policy and promote the aims and objectives of the Foundation with regard to equal opportunities.

## 9 **Monitoring and review**

9.1 **Monitoring:** To ensure that this policy is operating effectively with respect to admission and selection, and to identify those sections of the local community which may be under-represented in the Foundation, the Foundation monitors applicants gender, race, disability and religious belief as part of the Admissions procedure. We also maintain records of this data in an anonymised format solely for the purposes stated in this policy.

9.2 **Review:** The Bursar is responsible for the ongoing monitoring and regular analysis of the data monitored under paragraph 10.1 above and under paragraph 11.4 below and will arrange for the taking of appropriate positive steps to eliminate unlawful direct and indirect discrimination where necessary. The Bursar is also responsible for reviewing whether the aims of this Policy are carried out throughout all areas of the Foundation and taking appropriate action where necessary. This policy is reviewed annually by the Bursar. Recommendations for any amendments are reported to the Court of Governors.

## 10 **Reporting and recording incidents of discrimination**

10.1 **Questions about this policy:** If you are involved in management, or if you have any questions about the content or application of this policy, you should contact the Head of the relevant school

10.2 **Complaints:** If you believe that you have received less favourable treatment on any of the unlawful grounds listed in paragraph 1.2 above, or if you feel that this policy has been breached in any way to your detriment you are encouraged to raise the matter through the Foundation's formal Complaint's Procedure. For a copy of the Foundation's Policy on the handling of concerns and complaints received from Parents and Pupils aged over 16 years, please contact the Head of Grimsdell, Belmont or Mill Hill. Allegations regarding potential breaches of this policy will be treated in confidence and investigated in accordance with the complaints procedure.

- 10.3 **Reports:** If you would like to report a breach of this policy that does not constitute a complaint under paragraph 11.2 above, please contact the Head of the relevant school.
- 10.4 **Enforcement:** We will treat seriously and urgently investigate every complaint and report. The Foundation will always take a strict approach to serious breaches of this policy. Disciplinary action may be taken against any member of the Foundation Community who is found to have acted in contravention of this policy.
- 10.5 **Record:** All reported breaches of this policy will be recorded and this record will be reviewed annually by the Bursar.

## **11 Publication**

- 11.1 This policy will be available on the Foundation's website, in the Parent and Pupil's Handbook and on request from the School Office at The Mount, Mill Hill International, or Grimsdell, Mill Hill Pre-Preparatory School, or Belmont Mill Hill Preparatory School or Mill Hill School, or from the Bursar.