City of London School
Equal Opportunities (Pupils) Policy

0. Review of policy

0.1 The School is committed to the continuing development and review of its policies and procedures to ensure equality of opportunity and treatment to current and prospective pupils. The School will also, where necessary and appropriate, introduce new policies and procedures.

0.2 This policy will be reviewed annually (or more regularly where required) prior to approval by governors.

Last reviewed by:	Mark Wardrop (Senior Deputy Head)
Date last reviewed:	August 2025
Approved for Governors:	Board of Governors
Date approved:	8 October 2025

1. Introduction

1.1 The School is committed to promoting equality of opportunity for all members of its community, and values the rich diversity and creative potential that pupils with different backgrounds, skills and abilities bring to the School. The School is opposed to any form or discrimination, harassment or bullying on the grounds of any protected characteristic, and aims to create an environment where all current and prospective pupils are treated with dignity and respect and fairly with regard to their 'protected characteristics'.

This Equal Opportunities (Pupils) Policy sets out how the School intends to meet these aims and comply with its equality duties, and is written under the requirements of the Equality Act (2010) ('the Act'), and draws upon the DfE guidance The Equality Act 2010 and schools (2014).

All members of the School community are expected to comply with this policy. The School seeks to encourage greater awareness of its aims, policies and procedures in relation to equal opportunities and will provide information and training as required.

1.2 **Unlawful discrimination**
The Act defines four kinds of unlawful behaviour (direct discrimination, indirect discrimination, harassment and victimisation) as defined below:

1.2.1 **Direct discrimination**

This occurs when one person treats another less favourably, because of a protected characteristic, than they treat – or would treat – other people. This describes the most clear-cut and obvious examples of discrimination (e.g. if the School were to refuse to let a pupil become a prefect because he is gay).

1.2.2 **Indirect discrimination**

This occurs when a "provision, criterion or practice" is applied generally but has the effect of putting pupils with a particular characteristic at a disadvantage when compared to pupils without that characteristic (e.g. if the School were to hold a parents' meeting on a Friday evening, which would make it difficult for observant Jewish parents to attend).

1.2.3 **Harassment**

This is defined in the Act as "unwanted conduct, related to a relevant protected characteristic, which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person". This covers unpleasant and bullying behaviour, but potentially extends to actions which, whether intentionally or unintentionally, cause offence to a person because of a protected characteristic. Harassment in all its forms is unlawful and unacceptable.

1.2.4 **Victimisation**

This occurs when a pupil is treated less favourably than they otherwise would have been because of something they have done ("a protected act") in connection with the Act. A protected act might involve, for example, making an allegation of discrimination or bringing a case under the Act, or supporting another person's complaint by giving evidence or information, but it includes anything that is done under or in connection with the Act.

If a pupil has done a protected act themselves (e.g. making a complaint of discrimination against a teacher) then the pupil's own good faith will be relevant (e.g. if the parent's complaint is based on information from their child and the child was deliberately lying, it is not victimisation for the school to punish the pupil in the same way as it might do any other dishonest pupil).

A pupil must not be victimised because of something done by their parent or a sibling in relation to the Act.

1.3 **Failure to adhere to this policy**

The School will do its utmost to protect pupils from discriminatory behaviour by any individual or groups within the School. Allegations of discriminatory behaviour on the part of pupils or staff will be handled under the relevant policy: the pupils' Behaviour Policy or the Staff Grievance / Disciplinary Policies.

1.4 This policy should also be read in conjunction with the:

- Admissions Policy
- Behaviour Policy
- Learning Support and Disability Policy
- Accessibility Policy
- Curriculum and Teaching and Learning Policy
- PSHEE and SMSC Policy
- RSE Policy

1.5 This policy has regard to Schedule 10 of the Equality Act (2010) as outlined in the Independent School Standards Regulations.

2. Protected Characteristics

2.1 It is unlawful for a school to discriminate against a pupil or prospective pupil by treating them less favourably because of their:

- Sex (but please note the admissions criteria above)
- Disability
- Sexual orientation
- Gender reassignment
- Religion or belief[1]
- Race (including colour, nationality and ethnic or national origins)
- Pregnancy and maternity
- Age
- Marriage and civil partnership[2]

Everyone has at least some characteristics included in this list. (Also see the *Protected Characteristics* section below). The School aims to foster a sense of community in which all pupils are valued and can thrive regardless of any of these characteristics, and will seek to counter and discriminatory practices.

2.2 For issues related to gender reassignment, please see the School's Gender Identity Policy.

2.3 In teaching about sexual orientation and marriage and civil partnership, teachers must have regard to statutory guidance on sex and relationship education. For further information, please see the School's PSHE Policy.

3. Admissions

3.1 The School welcomes applications from candidates with as diverse a arrange of backgrounds as possible. Pupils are recruited on the basis of their merits, abilities and potential to take advantage of the particular educational provision of the School, which is suited to highly able and committed boys. **The School restricts admission to boys only**, and educational opportunities for girls are provided through our sister school (City of London School for Girls). In any review of selection criteria and procedures, the School will ensure that consideration is given to equal opportunities issues.

3.2 The School will not discriminate in relation to the protected characteristics listed above in its admissions processes.

[1] The Act defines "religion" as being any religion (e.g. all the major faith groups) and "belief" as any religious or philosophical belief (e.g. non-religious worldviews such as humanism); a lack of religion or a lack of belief are also protected characteristics.

[2] N.B. The last two of these protected characteristics ("Age" and "Marriage and civil partnership") **do not apply** to pupils within schools.

3.3 There will be no discrimination against pupils with Special Educational Needs and / or Disabilities (SEND), in so far as they have the academic ability to attend the School (which is selective). All pupils will have equal opportunity to access the curriculum. However, the School is not a specialist provider for SEND.

3.4 For further information, please see the School's Admissions Policy.

4. Disability

4.1 **Definition of 'disability'**

The Act defines a 'disability' as when a person has 'a physical or mental impairment which has a substantial and long-term adverse impact on a person's ability to carry out normal everyday activities'. This has some overlap with the definition of 'Special Educational Needs' (SEN) in the Children and Families Act (2014), but not all pupils are disabled by their SEN and vice versa. 'Disabled pupils', for the purpose of this policy, refers not only to those pupils with physical disabilities but could include, for example, those with health issues, including mental health, or learning disabilities if they meet the legal definition of 'disability'.

4.2 **Disability and discrimination**

- **Direct discrimination:** the School will not treat a disabled pupil less favourably simply because that pupil is disabled.
- **Indirect discrimination:** the School will not do something which applies to all pupils but which is more likely to have an adverse effect on disabled pupils only unless the School can show that it is done for a legitimate reason and is a proportionate way of achieving that legitimate aim.
- **Discrimination arising from disability:** the School will not discriminate against a disabled pupil because of something that is a consequence of their disability (e.g. by not allowing a disabled pupil on crutches outside at break because it would take them too long to get out and back).
- **Harassment:** the School will not harass a pupil because of their disability (e.g. a teacher shouting at the pupil because their disability means that they are constantly struggling with classwork or unable to concentrate).

4.3 **Reasonable adjustments**

4.3.1 The School will take reasonable steps to avoid putting disabled pupils at a substantial disadvantage in comparison with other pupils (the 'reasonable adjustment' duty).

4.3.2 Where the School is required to consider its reasonable adjustments duty, it will consult with parents about what reasonable adjustments, if any, the School is able to make to avoid their child being put at a substantial disadvantage. The school will carefully consider any proposals for auxiliary aids and services in light of a pupil's disability and the resources available to the School.

4.3.3 **Reasonable adjustments and pupils' behaviour**

Independent schools must comply with the Act in relation to pupil exclusions. The Act does not prohibit schools from excluding pupils with a protected characteristic but does prohibit schools from excluding pupils because of their protected characteristic or from discriminating unlawfully during the exclusion process. Schools also have a duty to make reasonable adjustments to the exclusions process for disabled pupils.

4.3.4 For further information, please see the School's Learning Support and Disability Policy.

4.4 The School's Accessibility Policy sets out the School's arrangements for:

- increasing the extent to which disabled pupils can participate in the School's curriculum.
- improving the physical environment of the School for the purpose of increasing the extent to which disabled pupils are able to take advantage of the education and benefits, facilities or services provided or offered by the School.
- improving the delivery to disabled pupils of information which is readily accessible to pupils who are not disabled.

5. Curriculum and Teaching

5.1 The Act explicitly states that the content of the School's curriculum is excluded from discrimination law.

5.2 However, the delivery of the curriculum is explicitly included. As such, the School will ensure that the way in which its teaching covers issues, thoughts and ideas of all kinds does not subject individual pupils to discrimination in relation to the protected characteristics listed above. Staff are expected to be sensitive about equal opportunities in their teaching and guard against the transmission, through the content and delivery of the curriculum, of attitudes which stereotype people or label individual pupils as inferior or limited. This includes through the planning of lessons, teaching methods, classroom resources, behaviour management, etc., and through the 'hidden lessons' implicit in other activities about their value as a person, their human rights, the options available to them and their expectations for adult life.

5.3 For further information about the content and delivery of the curriculum, please see the School's Curriculum and Teaching and Learning Policy.

6. Raising awareness

6.1 All school staff are expected to implement this policy on equal opportunities. Use is made of assemblies, PSHE, the curriculum and the co-curricular programme to:

- Help pupils to develop self-esteem and recognise that they are valued as individuals
- Promote respect for each other within the school community
- Promote positive images and role models to challenge prejudice and raise awareness of related issues

- Foster an open-minded approach and encourage pupils to recognise the contributions made by different cultures, and so enable pupils to contribute actively to the process of education by bringing to it their cultural experiences, values and perspectives
- Understand why and how we deal with offensive language and behaviour
- Understand why we will deal with any incidents in a sensitive manner and as promptly as possible
- Reflect the School's position as one which is explicitly anti-discriminatory. Specifically, the School holds positions that are anti-racist, anti-sexist – including misogyny – and, explicitly, anti-HBT (anti-homophobic, biphobic and transphobic).

6.2 In the event of some occurrence involving one or more of the protective characteristics, which became an issue among the pupils, the School will help pupils to understand the issues, and ensure that pupils respect all those with those characteristics.