Watford Grammar School for Girls

Equality Policy
with reference to the Public Sector Equality Duty (PSED)

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Contents

1. Vision and Values 3
2. Legislation and guidance 3
3. Identification 3
4. Roles and Responsibilities 4
5. The Public Sector Equality Duty 5
5.1. Eliminating discrimination 5
5.2. Advancing equality of opportunity 5
5.3. Fostering good relations 6
6. Equality objectives 6
7. Monitoring arrangements 6
8. Links with other policies 6
Appendix One: Equalities Report with reference to the Public Sector Equality Duty (PSED) 7
Appendix two: process for supporting students questioning their gender identity 15

1. Vision and Values

The aim of the school is to ensure that each student is encouraged to achieve academic excellence and fulfil their potential. Each student should be able to participate actively in all areas of school life, aiming to reach the highest standards in everything they do, within a framework of supportive pastoral care.

The core values of Watford Grammar School for Girls (WGGS) include a belief that all our students are of equal worth and concern. We value the diversity of our school: students and staff come from a wide variety of religious, ethnic and cultural backgrounds. We place great emphasis upon courtesy, respect, care and toleration. The school is a microcosm of what we would like society to be: a happy, caring collection of motivated hardworking individuals, capable of living together harmoniously, whilst recognising and respecting each others' differences.

Our school aims to meets its obligations under the public sector equality duty by having due to regard to the need to:

- Eliminate discrimination and other conduct this is prohibited by the Equality Act 2010.
- Advance equality of opportunity between people who share a protected characteristic and people who do not share it.
- Foster good relations across all characteristics – between people who share a protected characteristic and people who do not share it.

2. Legislation and guidance

Our school is committed to meeting its public sector statutory duties. We understand that these duties apply to service delivery, employment and staff management as well as policy development and implementation.

The single Public Sector Equality Duty came into effect in April 2011 as a result of the Equality Act 2010. It requires public bodies to promote equality and replaced three pre-existing duties relating to disability, race and gender equality.

The Equality Act 2010 brings together all existing equality legislations and covers both employees and students. We welcome our duties under the Equality Act 2010.

This document also complies with our funding agreement and articles of association.

3. Identification

The Equality Act 2010 was introduced to ensure protection from discrimination, harassment and victimisation on the grounds of specific characteristics (referred to as protected characteristics and defined in the Act). The school will therefore, in its work on equalities, have regard to these nine characteristics, which are:

Age
Disability
Gender reassignment
Marriage and civil partnership

Pregnancy and maternity
Race
Religion and belief
Sex
Sexual orientation

The school will also consider the equality between the student body as a whole and the following groups:

Pupil Premium Pupils
SEND students
EAL students
Other: Depending on the numbers of pupils in the school this may also include Children Looked After or formally Looked After, Young Carers and Refugees.

4. Roles and Responsibilities

The Headmistress will:

- Ensure that the school sets rigorous and measurable equality objectives.
- Monitor the school's success in achieving the objectives and report back to trustees, through the Annual Equalities Report.
- Maintain a focus on issues of equality throughout the academic year. This may involve working with the leadership team to undertake interim reviews of work on this area, and setting short-term targets. The school wishes to be ambitious in its work, and to be able to respond rapidly as needs become apparent.

The designated member of staff for equality will:

- Keep a log of incidents related to protected-characteristics, monitor trends and share this data regularly with SLT and pastoral staff
- Meet with the equality link governor annually to raise and discuss any issues

Support the headteacher in identifying any staff training needs, and deliver training as necessary
The trustee board will:

- Ensure that the equality objectives and Annual Equalities Report are published.
- Delegate responsibility for monitoring the achievement of the objectives on a daily basis to the Headmistress.

The equality link trustee is Olaide Olunloyo. They will:

- Meet with the designated member of staff for equality annually, and other relevant staff members, to discuss any issues and how these are being addressed
- Ensure they're familiar with all relevant legislation and the contents of this document
- Attend appropriate equality and diversity training
- Report back to the full trustee board regarding any issues

All school staff are expected to have regard to this policy and to work to achieve the objectives as set out in the Equalities Report.

5. The Public Sector Equality Duty

The Public Sector Equality Duty or "general duty" requires all public organisations, including schools, to:

- Eliminate unlawful discrimination, harassment and victimisation
- Advance equality of opportunity between different groups
- Foster good relations between different groups

The school will consider this duty closely when setting its equality objectives, and reviewing its work in the Annual Equalities Report.

The school's work to meet this duty will necessarily be dynamic. However, some key examples of how the school meets the duty are outlined below.

5.1. Eliminating discrimination

The school works actively to eliminate discrimination, including in the following ways:

- Considering equality implications when developing, adapting or reviewing any policy.
- Publishing transparent admissions arrangements.
- Addressing prejudice-based bullying, in line with the behaviour and anti-bullying policies.
- Employing a range of teaching strategies to meet the needs of all students.
- Monitoring teaching materials to avoid potentially damaging negative language in matters such as race, gender, disability and sexuality.
- Monitoring applicant data as part of our recruitment processes to identify any impact of unconscious bias.
- Delivering staff training to support staff in combatting discrimination.
- Considering equality implications when planning educational visits (e.g. is the visit affected by religious holidays?)
- The school has a designated member of staff for monitoring equality issues, and an equality link trustee. They regularly liaise regarding any issues and make senior leaders and trustees aware of these as appropriate.

5.2. Advancing equality of opportunity

The school works actively to advance equality of opportunity, including in the following ways:

- Monitoring the progress and outcomes of different groups of students – including the in the Annual Equality Report - and using this data to support school improvement.
- Ensuring that teaching materials, school displays and assemblies offer positive role models from a range of backgrounds,
- Implementing the attendance policy that recognises the right of pupils to take time off for religious observance, for up to 2 days.
- Meeting the needs of students and staff who wish to pray during the day.

- Clubs and societies are student-leads and reflect the interests and diversity of our community. Attendance is monitored and all students are encouraged to become involved in the full range of school clubs and societies.

5.3. Fostering good relations

The school works actively to foster good relations, including in the following ways:

- Promoting tolerance, friendship and understanding of a range of religions and cultures through different aspects of the curriculum. This includes teaching in RS, PACE and assemblies but also activities in other curriculum areas. For example, as part of teaching and learning in English, pupils will be introduced to literature from a range of cultures.
- Encouraging student-led societies and initiatives which celebrate the diverse identities within the school.
- Celebrating the diversity of the school through the assembly programme.

Working with our local community. This includes inviting leaders of local faith groups to speak at assemblies, encouraging Form Groups and Year groups to adopt Charity action that promotes equality.

6. Equality objectives

The equality objectives will be set by the Senior Leadership Team as a result of analysis of equalities data. The objectives will be part of the School Development Plan and will be published on the school website. An example of an objective is found below:

Objective:

Why we have chosen this objective:

To achieve this objective we plan to:

Progress we are making towards this objective:

7. Monitoring arrangements

The current Equalities Objectives will be published each year in the Equalities Report. The Report will indicate progress towards the objectives.

The report will be reviewed each year by the Curriculum Committee of the Trustee Body.

8. Links with other policies

This policy links to the following policies:

- Accessibility plan
- Admissions
- Behaviour
- Attendance
- SEND

Appendix One: Equalities Report with reference to the Public Sector Equality Duty (PSED)

Part 1: School Characteristics

A: Information about our students

Ethnicity		Number of students					% of population				
		Jun-22	May-23	May-24	Sep-24	Sep-25	Jun-22	May-23	May-24	Sep-24	Sep-25
	Afghan					2					0%
	African Asian					2					0%
	Any other Asian background	190	208	202	199	173	13%	14%	14%	14%	12%
	Any other Black background	4	4	3	4	3	0%	0%	0%	0%	0%
	Any other ethnic group	46	33	33	30	20	3%	2%	2%	2%	1%
	Any other mixed background	31	34	37	40	32	2%	2%	3%	3%	2%
	Any other white background					2					0%
	Asian and any other Ethnic Group					4					0%
	Asian and Chinese					2					0%
	Bangladeshi	11	14	15	16	16	1%	1%	1%	1%	1%
	Black – African	49	49	54	52	51	3%	3%	4%	4%	4%
	Black Caribbean	8	11	11	9	6	1%	1%	1%	1%	0%
	Chinese	22	28	36	41	47	2%	2%	2%	3%	3%
	Egyptian					3					0%
	Filipino					1					0%
	Hong Kong Chinese					4					0%
	Indian	403	432	438	453	474	28%	30%	30%	32%	33%
	Italian	4	6	4	2	2	0%	0%	0%	0%	0%
	Iranian					1					0%
	Not yet obtained				1	1				0%	0%
	Other Asian					22					2%
	Other Black					1					0%
	Other Ethnic Group					1					0%
	Other Mixed Background					2					0%
	Other Pakistani					2					0%
	Pakistani	228	213	206	215	218	16%	15%	14%	15%	15%
	Refused	56	53	54	39	34	4%	4%	4%	3%	2%
	Sri Lankan Other					1					0%
	Sri Lankan Sinhalese					4					0%
	Sri Lankan Tamil					3					0%
	Turkish	2	3	2	2	3	0%	0%	0%	0%	0%
	White – British	251	230	213	193	166	18%	16%	15%	13%	11%
	White – Irish	3	3	2	1	1	0%	0%	0%	0%	0%
	White and Any Other Ethnic Group					1					0%
	White and Indian					1					0%

	White Eastern European					3					0%
	White and Asian	52	53	52	52	57	4%	4%	4%	4%	4%
	White and Black African	7	7	7	8	9	0%	0%	0%	1%	1%
	White and Black Caribbean	8	8	8	6	7	1%	1%	1%	0%	0%
	White Other	56	64	72	68	64	4%	4%	5%	5%	4%
	Total	**1431**	**1453**	**1449**	**1431**	**1429**					

Age	Age is not a protected characteristic within the school's provisions for students.
Disability	The school makes adjustments for students with a disability.
Gender Reassignment	We support any student towards gender reassignment. The school has developed a support plan for any students who are questioning their gender.
Marriage & Civil Partnership	Marriage & civil partnerships are not protected characteristics within the school's provisions for students.
Pregnancy & Maternity	The school will put support in place for any student who presents with this protected characteristic.
Religion and Belief	Religion is not recorded. The major religions are represented amongst the student body.
Sex	We are a girls' school. However, we respect the wishes of our students who choose to identify with a gender other than female and offer support as appropriate.
Sexual Orientation	We support all students regardless of sexual orientation.
SEND	Educational Health & Care Plan: 1.1% SEN Provision: 5.2%
Pupil Premium	5.9% of students are eligible for Pupil Premium

B: Information about our employees

Age

	Number of staff					% of population				
Teaching	Jun-22	May-23	May-24	Sept 24	Sept 25	Jun-22	May-23	May-24	Sept 24	Sept 25
Under 20	0	0	1	0	0	0%	0%	1%	0%	0%
20-29	17	14	19	13	10	17%	13%	14%	12%	10%
30-39	28	33	33	19	20	27%	31%	24%	17%	19%
40-49	24	26	36	41	34	24%	24%	27%	37%	33%
50-59	24	21	29	26	27	24%	19%	21%	23%	26%
60 +	9	15	17	12	13	9%	14%	13%	11%	13%
Non-teaching										
Under 20	12	11	11	8	8	9%	8%	9%	6%	7%
20-29	12	13	5	10	5	9%	9%	4%	7%	4%
30-39	14	18	13	19	13	11%	13%	10%	13%	11%
40-49	23	23	32	33	26	18%	16%	25%	11%	23%
50-59	46	47	36	37	32	35%	33%	28%	26%	28%
60 +	24	29	31	37	30	18%	21%	24%	26%	26%
Total	233	250	250	260	218					

*Please note that the information about employees does not include peripatetic staff, LAMDA teachers, self-employed agency staff or any PGCE/Trainee teacher placements.

Disability	The school makes adjustments for staff members with a disability.

Ethnicity	Please see overleaf.
Gender Reassignment	We support any member of staff towards gender reassignment.
Marriage & Civil Partnership	The school complies with its equalities duties in this regard.
Pregnancy & Maternity	The school complies with its equalities duties in this regard.
Religion & Belief	This is not recorded. A range of religions and beliefs are reflected across the staff body.

Sex

	Number of staff					% of population				
Teaching	**Jun-22**	**May-23**	**May-24**	**Sept 24**	**Sept 25**	**Jun-22**	**May-23**	**May-24**	**Sept – 24**	**Sept – 25**
Male	19	19	23	21	18	19%	17%	17%	19%	17%
Female	83	89	112	90	86	81%	83%	83%	81%	83%
Total				111	104					
Non-Teaching										
Male	21	22	19	25	19	16%	16%	15%	16%	17%
Female	110	119	109	123	95	84%	84%	85%	84%	83%
Total				148	114					

Sexual Orientation	We are committed to supporting all staff members regardless of sexual orientation.

Staff Ethnicity	Number of staff					% of population				
Teaching	**Jun-22**	**May-23**	**May-24**	**Sep-24**	**Sep-25**	**Jun-22**	**May-23**	**May-24**	**Sep-24**	**Sep-25**
Any other ethnic background	1	2	2	3	3	1%	2%	1%	3%	4%
Asian or Asian British, Any other Asian background	2	2	4	3	3	2%	2%	3%	3%	3%
Asian or Asian British, Indian	9	9	9	8	7	9%	8%	7%	7%	7%
Asian or Asian British, Pakistani	4	5	6	6	6	4%	5%	4%	5%	6%
Black or Black British, African	1	1	1	1	1	1%	1%	1%	1%	1%
Did not wish to be recorded	6	7	8	6	5	6%	7%	7%	6%	5%
Mixed White and Asian	0	0	1	1	0	0%	0%	0%	1%	0%
Mixed, any other mixed background	1	1	2	3	1	1%	1%	1%	3%	1%
Mixed, White and Black African	1	1	1	1	1	1%	1%	1%	1%	1%
White, any other White Background	6	5	8	7	7	6%	5%	5%	6%	7%
White, British	70	71	76	69	65	69%	66%	66%	62%	63%
White, Irish	1	3	3	3	3	1%	3%	3%	3%	3%
None recorded			12	0	1			9%	0%	1%
Non-Teaching										
Any other ethnic background	2	1	1	1	1	2%	1%	1%	1%	1%
Asian or Asian British, Any other Asian background	4	3	4	9	10	3%	2%	2%	6%	9%
Asian or Asian British, Bangladeshi	1	3	3	3	2	1%	2%	2%	2%	2%
Asian or Asian British, Indian	13	18	20	16	13	10%	13%	13%	11%	11%

Asian or Asian British, Pakistani	7	7	6	6	6	5%	5%	5%	4%	5%
Black or Black British, African	2	2	2	3	1	2%	1%	1%	2%	1%
Black or Black British, Caribbean	1	0	3	4	3	1%	0%	0%	3%	2%
Chinese	2	2	2	4	5	2%	1%	1%	3%	4%
Did not wish to be recorded	9	5	3	4	2	7%	4%	4%	3%	2%
Mixed White and Asian	1	0	1	1	2	1%	0%	0%	1%	2%
Mixed, any other mixed background	0	0	0	0	0	0%	0%	0%	0%	0%
Mixed, White and Black African	0	0	0	0	0	0%	0%	0%	0%	0%
Mixed, White and Black Caribbean	0	0	0	0	0	0%	0%	0%	0%	0%
Not Obtained	1	1	1	22	1	1%	1%	1%	15%	2%
White, any other White Background	14	13	11	13	8	11%	9%	9%	9%	7%
White, British	71	62	63	60	57	54%	44%	49%	41%	50%
White, Irish	3	2	1	2	2	2%	1%	1%	1%	2%
None recorded			6	0	2			5%%	0%	2%

Part 2: Examples of actions, 2024-25

Eliminating Discrimination

Raising awareness:

- RPE have invited speakers during the Core RS Days to focus on combatting religious discrimination in society.
- StandUp! delivered workshops on the Equalities Act and protected characteristics annually. These are embedded as part of the Year 9 PSHE programme, and in 2024/25, were also delivered to students in Year 12. Students in Year 9 took part in their core anti-discrimination workshops, whilst Year 12 took part in their workshops on The Media and Propaganda: free speech or hate speech?
- Bold Voices Workshop was delivered to Y13 in collaboration with WGBS in the Autumn Term. The focus was on sexual harassment and violence. A workshop for Year 8 was delivered in the Summer Term. Y12 boys and girls acted as mentors for Y8 students.

The PACE / FORUM programme has been developed to embed the following:

- Annual Diversity Week (we have done a focus on the LGBTQ community as well as disabilities)
- Year group talks on visible and invisible disabilities
- Racism around me
- Raising awareness of microaggressions
- 'Prejudice Around Me' talks from SfYP
- LGBTQ+ talks from SfYP
- International Women's Day
- Tackling misogyny
- Citizenship lessons for Year 9 focused on protected characteristics and human rights.

The assembly programme included:

- Black History Month led by the Afro-Caribbean Society
- Jewish Holidays, Diwali, Sikh and Jain Celebrations, Christmas, Fasting, Holi, Easter led by members of our Islamic, Jewish, Sikh, Jain and Christian societies.
- Holocaust Memorial Day led by Miss Tai
- International Women's Day led by Mrs Randhawa
- Windrush
- Events to celebrate diversity are a regular feature of the calendar e.g. Iftar, Around the World Day.

Dealing with instances of discrimination:

- A protocol for students to follow if they encounter prejudice-based behaviour has these have been promoted regularly with students. Posters are on display across the school.
- Standup! delivered PACE sessions to Year 8 students with a focus on discriminatory language and bullying.

- The school was advised by TellMama and CST (Protecting our Jewish Community), who have been an excellent source of guidance and resource following discriminatory incidents.

Curriculum:

- A diversity audit of the curriculum was conducted 2022/23.The audit scheduled to be completed in July 2025 was postponed until 2026.

Policies:

- The Anti-bullying Policy establishes the principle that all students should feel safe in school.
- The Pay Policy acknowledges, explicitly, the need for all pay decisions to be informed by the school's Public Sector Equality Duties.
- The Uniform Policy has been updated to clarify guidelines on hair colour. This has been done to remove possible misinterpretation which could result in discrimination.

Advancing equality of opportunity

- Meeting the needs of particular groups:
- A multi-faith prayer room is provided.
- A range of student societies have provided a safe space for students to explore issues of identity. These have included J-Soc, I-Soc, Spectrum (LGBTQ+) and ACS (Afro-Caribbean Society).
- The Hive has continued to function as an appropriate safe space for supporting students with a range of needs. It has been particularly important for supporting students with ASD.
- Regular 'Spotlights on SEND' have been delivered by the SENDCO to update staff on the latest research and best practice around SEND inclusion and teaching.
- Adaptive teaching and metacognition remain on the SDP and the rewards system is now linked to the metacognition concept of habits of mind which focusses on inclusion for all students.
- The curriculum has been adapted to meet the needs of a small number of students with disabilities.
- Over the summer holidays the site team refreshed the yellow paint for all staircases and access points to support a VI student in Year 7.
- The DSP team has worked closely with the SENDCO, Exams Officer, Heads of Year, and outside professionals from CAMHS, to ensure that the particular students, who can be considered as having a disability on account of their mental health diagnoses, are supported appropriately.
- Anonymised application forms now being used for staff vacancies to combat unconscious bias.
- Staff were surveyed about their experiences of sexual harassment in the workplace.
- Staff wellbeing surveys used to identify issues of discrimination and/or adaptations.

Ensuring excellent achievement for all:

- School attainment data has been analysed regularly to consider the performance of specific student groups, and appropriate actions planned as a result.

Promoting positive messages:

- Displays around the school promote positive messages about the diversity. There are many displays about the achievements of girls and women, and also current displays about Black History month, and diversity in the ancient world.

Fostering good relations

- Celebrating diversity
- Assemblies have celebrated the diversity of our community, with assemblies covering Lent, International Women's Day, Holocaust Memorial Day and Ramadan.
- All interfaith groups are involved in planning for assemblies and other faith celebrations throughout the school year. So, for example, the introduction of the Pongal celebration by the Tamil Society.

The library:

Themed book promotions included the following to promote equality and diversity

- September Censorship and Banned Books
- October Black History Month
- January Holocaust Memorial Day
- February LGBT History Month
- March Fierce Females in Fiction (for International Women's Day)
- March Eid Mubarak

- April Faith and culture (Islam and Christianity)
- June Empathy and Kindness (for Empathy Week)
- July Women in Sport

- The Banned Books Display inspired discussion about the censorship of books amongst a group of Y9s in the library, “Why would anyone ban books?”

Library Collection Management

- The library continues to provide material which reflects the lives, experiences, beliefs and choices of the students and the school community. We actively buy stock to reflect the diversity in our community and continue the retrospective cataloguing project to re-index older books with the current terminology.
- 486 (374) books classified to the following: BAME 272 (234), LGBTQ+ 139 (122), Neurodiversity 33 (29), Disability 42 (42)
- Book covers – diversity of book covers in all displays and face on material
- Diverse books chosen to be used as examples in library lessons when demonstrating different genres and categories of books

Building links with the local community

- Students have been involved in a range of activities within the local community, which help build relations between different groups. These included an extensive collection for a local food bank at harvest.Y12 collate Christmas hampers for local care homes. The Art Department provided materials for the Almshouses, the Christian Union worked with the local church to celebrate Christmas.
- The school hosted a charity Iftar meal in March 2025, which was attended by families and the wider community.

Curriculum:

- The RS curriculum allows students to develop knowledge and understanding of a range of religious traditions.

Part 3: Equality Objectives

Objective:	Protected Characteristics	Key Outcome(s):	Why we have chosen this objective:	To achieve this, we plan to:	Progress we are making towards this objective:	Review Date
To review and, where necessary, update our curriculum to ensure that they are representative of all protected characteristics.	All Eliminating Discrimination, Fostering good relations	• Curricula in all departments reflect the profile of the school. • Students report that the curriculum supports their understanding of diversity.	We want all students to feel a sense of belonging. We want them to see themselves reflected in what they are learning and feel that the curriculum has relevance.	• Use audit to identify the SoWs to prioritise for improvement. • Provide guidance and support for departments where diversification is not as obvious e.g. maths • Conduct student voice on the diversity of the curriculum. • Re-audit the curriculum to identify impact.	• Audit of the curricula in all departments against the 9 protected characteristics to identify strengths and areas for development (Feb 2023). • Adaptations have already begun to diversify the curriculum. This is however easier in some departments than in others. • HfL Diversity advisors have worked with the PACE coordinator to review the curriculum in this area. • ST and KC have conducted school visits to see how they have diversified their curricula.	July 2026 Completed Completed
To review relevant school policies and publications to ensure they clearly reflect the diversity of the school and reflect the aim of inclusivity.	All Eliminating Discrimination, Advancing Equality of Opportunity	• School policies and publications are reflective of the school community.	We want to emphasise commitment to inclusion, equality and diversity through what people see and experience when they visit our school.	• Take new images for the school website and prospectus which exemplify the school's diverse community. • Using data which has informed the PSED, review and add any necessary actions related to equality and inclusion to the SDP. • Ensure that when policies are renewed, we are considering inclusion.	• School values have been rewritten. They include a stronger focus on inclusivity. • Reviewed the uniform policy to ensure that language related to hair colour and style are inclusive. • New images have been taken for the school website and prospectus; they better reflect the diversity of the school.	Completed Completed PSED data analysed annually Policies renewed annually
To improve access to the school site for disabled users.	Disability Eliminating Discrimination, Fostering good relations	• Disabled parking available on the North Site • Hearing Loop Induction system installed in the Main Hall	We want all users of the site to feel welcomed and be able to participate fully in school events through improved access.	• Identify and reassign 2 bays on the North Site for disabled parking. • Identify potential funding stream for Hearing Loop Induction system. • Install Hearing Loop Induction System in the Main Hall. • Update site map to highlight accessibility points.	• All yellow lines in stairwells and access points were refreshed by the site team over the summer holidays. • An access ramp and automated door have been installed on the south side of the main building to improve access for disabled users. June 2023	July 2026 Reviewed only when we know of a student coming on roll requiring use of the hearing loop induction system Site map to be updated in Spring 2026

					• Hearing Loop Induction System will not be introduced until there is student need.	
Continue to widen the extra-curricular programme to ensure that students from all ethnic backgrounds are engaged and participating.	All (in particular race and disability) Eliminating Discrimination, Advancing Equality of Opportunity	• All students are engaged in at least one club/society.	We recognise the benefits that extra-curricular participation can have on students' enjoyment of school and access to opportunities later in their educational career.	• Use online platform to track and monitor attendance at clubs and/societies. • Intervene where students are not engaged in at least one activity. • Collect student voice (especially from those who are less engaged) to identify any additional extra-curricular opportunities we could offer. • Engage with parents to promote the value of clubs.	• New programme of clubs and/societies has been collated for the academic year 2024-25. 100 clubs in operation. • Attendance at clubs and societies have been tracked on Squad in Touch. Non-participation is addressed regularly by form tutors and year teams. • Student Focus Groups provided pupil voice regarding the extracurricular offer. • The school is attempting to move the administration and analysis of extra curricular clubs onto Bromcom because Squad in Touch no longer provides value for money.	Reviewed termly

Appendix two: process for supporting students questioning their gender identity

1. Introduction and legal framework

This appendix outlines how the school will support transgender and gender questioning students. It aims to build on practice already in place to meet the school's legal obligations under the Equality Act 2010, the Gender Recognition Act 2004, UK GDPR, and the Data Protection Act of 2018.

1.1. The Gender Recognition Act, 2004

The Gender Recognition Act 2004 contains provisions for the process by which a person can obtain a Gender Recognition Certificate, in order to amend their original birth certificate to reflect their acquired gender. This can only occur after a person reaches 18 years of age.

1.2 The Equality Act, 2010

The Equality Act 2010 ensures legal protection against discrimination, harassment and victimisation (direct or indirect) for everyone under the nine protected characteristics defined in the Act, one of which is Gender Reassignment (also known as Transgender).
Part 6 of the Equality Act 2010 specifically refers to schools and young people and provides that it is unlawful for the 'responsible body' of a school to discriminate against, harass or victimise a student or prospective student. This means that it is unlawful for the school to treat students less favourably because of their gender reassignment.

The Equality Act 2010 (Part 2: Chapter 1: Section 7) states that a person has the protected characteristic of gender reassignment if the person is proposing to undergo, is undergoing or has undergone a process (or part of a process) for the purpose of reassigning the person's sex by changing physiological or other attributes of sex. The Act applies to employment, education and a range of other areas where discrimination may take place. In order to be protected under the Act, a student will not necessarily have to be undergoing a medical procedure to change their sex, but they must be taking steps to live in the opposite gender or be proposing to do so.

2. School aims in supporting transgender and gender-questioning students

We recognise that each student is unique, and we will treat each transgender or gender-questioning student as an individual, listening carefully to their views. For each student, we shall put in place an individual support plan, which identifies needs and strategies for support.

In devising individual support plans, we shall have a number of key aims:

- To ensure that the student does not experience discrimination or prejudice-based behaviour in school.
- To ensure that the student is supported to play a full and active part in the life of the school.
- To ensure that the student is, as appropriate, supported to access external professional support.

3. Guidance, training and support for staff

Guidance, support and training will be provided to staff to ensure that the school's obligations to transgender students are met.

Individual staff (teaching and support) will be encouraged to attend appropriate training session to be able to support the needs of the transgender student and the wider school community.

4. The individual support plan

Support for a young person will begin when they choose to make the school aware that they are transgender or gender-questioning.

A member of pastoral staff – normally the Head of Year – will meet the student to listen to their needs as an individual, and to put in place an individual support plan.

The plan will include some key elements, which are outlined in further detail below.

- A record of the name and pronouns by which the student wishes to be known at school.
- A record of the young person's wishes around information sharing with parents.
- A record of any needs the young person may have in their life in school - or beyond school - as a result of their transgender of qender-questioning identity, and an action plan to manage these needs.
- A named individual who will maintain regular check ins with the young person.

The plan will be uploaded to CPOMS, as this is the central repository of all pastoral information for a student.

4.1 Names and pronouns

In preparing the support plan, the member of staff will ask the student the name and pronouns which the student wishes to use in school.

The member of staff will make clear that the school is keen to support the use of a preferred name. They will also highlight, however, that frequent changes of preferred name create a potential safeguarding concern, as there is a risk that a student who has been known by several different names will be mis-identified. For this reason, it is important that, when a preferred name is recorded, it is one which the student judges they will be comfortable with for a sustained period of time.

The preferred name and pronouns will be recorded on SIMS, and staff made aware.
If the young person does not consent for their preferred name and pronouns to be used with parents, then the school has a legal duty to avoid doing this, as outlined in section 4.2 below. On SIMS, it will be recorded clearly next to the preferred name and pronouns whether these can be used with parents. In instances where the name and pronouns cannot be shared, school communications with parents – such as reports – will continue to be issued with the student's legal name. Staff will be advised to check carefully whether a preferred name can be used with parents before contacting home.

4. 2 Information sharing with parents

The member of staff preparing the support plan will outline the fact that it is likely to be in the best interests of the young person if information known to school is shared with parents. There are many reasons for this:

- It avoids the possibility of parents finding out unexpectedly and in an unmanaged way. A student who uses a preferred name and pronouns in school may find this will become known to parents accidentally e.g. through friends using it.
- It allows parents to support the young person at home. The young person spends far more time in the home environment than in school.
- It avoids the young person needing to manage the challenges of a 'double identity', which may clearly have an impact on mental health.

The member of staff will explain that the school can support the young person in sharing this information.

If, however, the young person is unwilling to share information with parents, then the school recognises that under the UK-GDPR and Data Protection Act 2018, sharing information about names, pronouns and transgender status with parents would be illegal, unless another lawful basis exists.

The support plan will record clearly what decisions the young person has reached about information sharing. If the young person wishes for support in sharing information with parents, the plan will outline how the school will work with the student to do this.

4. 3 Needs arising from transgender/gender-questioning status

The member of staff preparing the support plan will ask the young person whether they have any needs – in school or beyond – which arise because of their transgender or gender-questioning status. They will record these, and log a plan to support the student.

This section of the plan will, necessarily, respond to the needs of the individual. The member of staff preparing the plan may need to liaise with the safeguarding team, and the school may need to take further advice, depending on the issues which arise. However, some possible issues which may be raised are:

- The young person has experienced prejudice-based behaviour in school. In this case, the member of staff should log this on CPOMS, and it will be actioned in line with our policy on such behaviour.
- The young person is concerned about how friends will react to their gender questioning or transgender status. The member of staff should explore with the student how to manage this, drawing on existing good practice in pastoral work about how to help a young person share sensitive information with peers.
- The young person has experienced prejudice-based behaviour outside of school. This should be logged on CPOMS, and will be actioned by the safeguarding team.
- The young person wishes to access professional support outside of school.

The member of staff will also check with the student about whether participation in swimming lessons, or PE, poses particular challenges. There is more information about these in section below, and how the school will respond in these circumstances.

4. 4 Named individual for ongoing support

The student will identify a named individual member of staff – often the Head of Year – who will complete subsequent welfare check ins. During these check ins, the member of staff should check to see whether further concerns, as in section 4.3, have arisen.
These check ins will be logged on CPOMS, in line with our established practice around regular pastoral check ins.

5. Sports and Physical Education

Sports and Physical Education is an integral part of the school's curriculum incorporating the physical and mental well-being of students. A young transgender person has the same right to Physical Education as other young people. With regard to transgender students, there should be reasonably few, if any, issues regarding participation within the sports of their acquired gender.
If a student is binding their chest, they should be monitored carefully during particularly physical activities and in hot weather. There is a chance that the binding could cause discomfort or even impair breathing. Short breaks from activity could be offered discretely.

When competing at another school or outside venue, school staff must try to ensure there is appropriate sensitive provision available. The school may also refer to the relevant governing sporting body for further advice and guidance.

6. Swimming lessons

Students will be expected to participate in swimming lessons. A risk assessment will be carried out to consider appropriate changing facilities and clothing.

7. Toilets

Transgender students may prefer to use the school's gender-neutral facilities which are labelled appropriately.

8. School uniform

Transgender Students will be expected to adhere to the school's policy on School uniform and may wear trousers or skirts as preferred.

9. School visits

Learning about different cultures and lives and taking part in activities may lead to overnight stays, both at home and abroad. Issues may arise for transgender students, but this must not mean transgender Students cannot be included on the visit. Consideration should be given in advance of any additional needs to ensure the transgender student is fully included. The sleeping arrangements will be considered before a visit is undertaken; it is possible that the transgender Student would prefer to have a separate room etc. Each individual case and visit needs to be considered separately and discussions will happen well in advance, with all appropriate bodies, linked to the accommodation available. Where a transgender student is travelling abroad as part of a visit the school will consult with the relevant authorities to obtain guidance around any cultural and/or social issues which may require further consideration.

Details of work undertaken to support the student in engaging with school visits will be recorded as an additional section to the Individual Support Plan.

10. Safe space

The school's LGBTQ society will offer a safe and supportive environment.