Equality Policy

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1 Aims

1.1 This is the Equality Policy of Discovery Educational Trust (DET) (the Trust).

1.2 The aims of this Policy are as follows:

1.2.1 to promote equal treatment within the Trust and its Schools for all members of the Trust and School communities;

1.2.2 to communicate the commitment of the Trust and its Schools to the promotion of equal opportunities;

1.2.3 to create and maintain an open and supportive environment which is free from discrimination, harassment and victimisation;

1.2.4 to foster mutual tolerance and positive attitudes so that everyone can feel valued within the Trust and its Schools;

1.2.5 to explain the proactive duty to make reasonable adjustments for disabled pupils to assist them in overcoming any substantial disadvantage caused by way of a disability;

1.2.6 to promote a culture of safety, equality and protection; and

1.2.7 to actively promote and safeguard the welfare of children, staff and others who come into contact with the Trust and its Schools.

2 Scope and Application

2.1 This Policy applies to the whole Trust and its Schools, including, where relevant, the Early Years Foundation Stage (**EYFS**) and the Sixth Form.

3 Regulatory Framework

3.1.1 This Policy has been prepared to meet the Trust's and its Schools' responsibilities under:

3.1.2 Equality Act 2010;

3.1.3 Education (Independent School Standards) Regulations 2014;

3.1.4 Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017/353;

3.1.5 Statutory framework for the Early Years Foundation Stage (DfE, December 2023);

3.1.6 Education and Skills Act 2008;

3.1.7 Children and Families Act 2014;

3.1.8 Childcare Act 2006;

3.1.9 Data Protection Act 2018 and UK General Data Protection Regulation (**UK GDPR**).

3.2 This Policy has regard to the following guidance and advice:

3.2.1 Equality Act 2010: explanatory notes (2010);

3.2.2 Equality Act 2010: Advice for schools (DfE, June 2018);

3.2.3 Technical guidance for schools in England (Equality and Human Rights Commission, July 2024);

3.2.4 Public Sector Equality Duty: Guidance for schools in England (Equality and Human Rights Commission, updated August 2022);

3.2.5 Preventing hair discrimination in schools (Equality and Human Rights Commission, updated July 2023);

3.2.6 Gender separation in mixed schools (DfE, June 2018);

3.2.7 Special educational needs and disability code of practice: 0 to 25 years (DfE, May 2015);

3.2.8 Tips for tackling discriminatory bullying (Equality and Human Rights Commission);

3.2.9 Working together to safeguard children (HM Government, March 2026);

3.2.10 Keeping children safe in education (DfE, September 2025); and

3.2.11 Relationships Education, Relationships and Sex Education (RSE) and Health Education guidance (DfE, September 2021).

3.3 The following Trust and School policies, procedures, documents and resource material are relevant to this Policy:

3.3.1 DET Equality, Diversity and Inclusion in Employment Policy;

3.3.2 Admission Arrangements for each Trust School;

3.3.3 School Behaviour Policies;

3.3.4 DET Uniform Policy;

3.3.5 School Anti-Bullying Policies;

3.3.6 DET Special Educational Needs and Disability Policy;

3.3.7 School SEN Information Reports;

3.3.8 DET Supporting Pupils with Medical Conditions Policy;

3.3.9 School Accessibility Plans;

3.3.10 DET Equality Statement and Objectives;

3.3.11 School Relationships and Sex Education Policies.

4 Publication and Availability

4.1 This Policy is published on the Trust website.

4.2 This Policy is available in hard copy on request.

4.3 A copy of the Policy is available for inspection from School Offices/Receptions during the school day.

4.4 This Policy can be made available in large print or other accessible format if required.

5 Definitions

5.1 Where the following words or phrases are used in this policy:

5.1.1 References to the Trust and DET are references to Discovery Educational Trust.

5.1.2 References to parent or parents means the natural or adoptive parents of the pupil (irrespective of whether they are or have ever been married, with whom the pupil lives, or whether they have contact with the pupil) as well as any person who is not the natural or adoptive parent of the pupil, but who has care of, or parental responsibility for, the pupil (e.g. foster carer / legal guardian).

5.1.3 References to the Public Sector Equality Duty **(**PSED**)** are references to the duty as defined in S.149 of the Equality Act 2010.

5.1.4 Reference to EHCP(s) is to Education and Health Care Plan(s).

5.1.5 References to Protected Characteristics are as defined in Chapter 1 of the Equality Act 2010.

5.1.6 Reference to PSHE is the personal, social, health and economic education programme.

5.1.7 References to the Trust and/or School community includes staff, Members, Trustees, Local Governors, pupils, parents, visitors and volunteers.

5.1.8 References to school days mean Monday to Friday, when the Trust Schools are open to pupils during term time. The dates of terms are published on the Schools' websites.

6 Responsibility Statement and Allocation of Tasks

6.1 The Trust has overall responsibility for all matters which are the subject of this Policy.

6.2 The Trust is aware of its duties under the Equality Act 2010 and the requirement to meet the PSED. To ensure the efficient discharge of its responsibilities under this Policy, the Trust has allocated the following tasks:

Task	Allocated to	When / frequency of review
Keeping the policy up to date and compliant with the law and best practice	Trust Director of Operations	As a minimum annually, ideally termly, and as required
Monitoring the implementation of the Policy (ensuring its accessibility and availability), relevant risk assessments and any action taken in response and evaluating effectiveness	Executive Headteacher (EHT)/Headteachers (HTs)	As a minimum annually, ideally termly, and as required

Task	Allocated to	When / frequency of review
Seeking input from interested groups (such as pupils, staff and parents) to consider improvements to the Trust/School's processes under the Policy	EHT/HTs	As a minimum annually, ideally termly, and as required
Formal annual review	Trust Director of Operations	Annually
Overall responsibility for content and implementation	DET	As a minimum annually

7 Public Sector Equality Duty (PSED)

7.1 The Trust, in carrying out its functions, must have regard to the General Duty by:

7.1.1 When making any decision that will affect a pupil or staff member with a Protected Characteristic, having due regard to the need to:

(a) eliminate discrimination and other conduct that is prohibited by the Equality Act 2010;

(b) advance equality of opportunity between people who share a Protected Characteristic and people who do not share it; and

(c) foster good relations across all characteristics - between people who share a Protected Characteristic and people who do not share it.

7.1.2 Having due regard to the need to advance equality of opportunity as set out in Paragraph 7.1.1(b) involves having due regard, in particular, to the need to:

(a) remove or minimise disadvantages suffered by persons who share a relevant Protected Characteristic that are connected to that characteristic;

(b) take steps to meet the needs of persons who share a relevant Protected Characteristic that are different from the needs of persons who do not share it; and

(c) encourage persons, who share a relevant Protected Characteristic, to participate in public life or any other activity in which participation by such persons is disproportionately low.

7.1.3 Having due regard to the need to foster good relations as set out in paragraph 7.1.1(c) above involves having due regard, in particular, to the need to:

(a) tackle prejudice; and

(b) promote understanding.

7.1.4 Compliance with the General Duty may involve treating some persons more favourably than others, but that is not to be taken as permitting conduct that is otherwise prohibited under the Equality Act 2010.

7.2 The Trust must also comply with Specific Duties[1] by:

7.2.1 Publishing information to demonstrate how it is complying with the General Duty set out above. This information may include non-confidential school performance data, policies, evidence of engagement, school development plans and equality milestones (this information must be updated, at least, annually).

7.2.2 Preparing and publishing one or more specific and measurable equality objectives, at least, once every four years, together with evidence of the steps taken and progress made towards meeting previous equality objectives.

8 Policy Statement

8.1 The Trust and its Schools recognise the benefits of having a diverse community, with individuals who value one another, and the different contributions everyone can make. The Trust and its Schools promote an inclusive environment where pupils will be taught to value and respect others. The Trust and its Schools are committed to being an equal opportunities education provider and are committed to equality of opportunity for all members of the Trust and School communities.

8.2 In the provision of equal opportunities, the Trust and its Schools recognise and accept their responsibilities under law to oppose discrimination on the basis of the following Protected Characteristics:

8.2.1 disability;

8.2.2 gender reassignment;

8.2.3 pregnancy and maternity;

8.2.4 race;

8.2.5 religion or belief (including lack of religion or belief);

8.2.6 sex; and

8.2.7 sexual orientation.

8.3 The Protected Characteristics of marriage and civil partnership, and age are not applicable to pupils.

8.4 The Trust and its Schools also oppose all bullying and unlawful discrimination on the basis that a person has special educational needs or a learning difficulty, a different cultural or linguistic background, or academic or sporting ability.

8.5 The Trust and its Schools aim to ensure that all policies and practices conform with the principle of equal opportunities and comply with the PSED.

8.6 The Trust and its Schools will have due regard to its duties under the PSED when:

8.6.1 taking a decision or action, the Trust and its Schools will assess the implications of the decision or action for people with a particular Protected Characteristic;

[1] The specific duties were created by secondary legislation in the form of the Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017, which replace the Equality Act 2010 (Specific Duties) Regulations 2011.

8.6.2 undertaking policy development or decisions, the Trust and its Schools will have regard to the equality implications before and at the time of the policy development or decision;

8.6.3 consciously consider each aspect of the General Duty, ensuring that members of the Trust and School communities are aware that having due regard to the need to eliminate discrimination is not the same as having due regard to the need to advance equality of opportunity;

8.6.4 assessing risk and any adverse impact that may result from a policy or decision taken by the Trust and its Schools and how this risk may be eliminated before the adoption of a proposed policy or decision;

8.6.5 carrying out the Trust and School functions, the Trust and its Schools will ensure that the PSED is integrated into those functions, through rigorous analysis; and

8.6.6 recording the steps that the Trust and its Schools have taken to comply with this duty.

8.7 The Trust and its Schools will tackle inappropriate attitudes and practices through staff leading by example, through the PSHE curriculum, the Relationships and Sex Education (RSE) curriculum, through the supportive Trust/School culture and through the Trust and its Schools' policies.

8.8 The Trust and its Schools recognise that schools and colleges can play an important role in preventative education in respect of safeguarding and sexual violence and sexual harassment, including online. The Trust and its Schools recognise the important part that RSE contributes to preventative education and this is reflected in the School's RSE curriculum and policy.

9 Discrimination

9.1 Discrimination may be direct or indirect, or arising from disability and it may occur intentionally or unintentionally. This Policy covers the following forms of discrimination:

9.1.1 **Direct discrimination:** Direct discrimination occurs when a person is treated less favourably than another person because of a Protected Characteristic. For example, rejecting an applicant of one race because it is considered that they would not "fit in". This would be a decision based on grounds of their race and would be direct discrimination. Direct discrimination also occurs when a person is treated less favourably because of their association with another person who has a Protected Characteristic (other than pregnancy or maternity). For example, if a pupil is harassed or victimised because a sibling is disabled, this would be direct discrimination against that pupil.

9.1.2 **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, they would be indirectly discriminatory on the grounds of sex.

9.1.3 **Discrimination arising from disability:** Discrimination arising from disability occurs when a disabled person is treated unfavourably because of something connected with their disability and the treatment cannot be shown to be a

proportionate means of achieving a legitimate aim. For example, where a pupil with cerebral palsy, who is a wheelchair user, is told that they will be unable to attend a school trip because there is no wheelchair access available and other options are not investigated.

10 Harassment

10.1 This Policy covers the following forms of harassment:

10.1.1 **Harassment related to a Protected Characteristic:** Harassment may occur where someone engages in unwanted conduct related to a Protected Characteristic that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading or offensive environment for that person. This covers unpleasant and bullying behaviour, but potentially extends also to actions which, whether intentionally or unintentionally, cause offence to a person because of a Protected Characteristic.

10.1.2 **Sexual harassment:** Harassment may also occur where a person engages in unwanted conduct of a sexual nature and that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading or offensive environment for that person. It is also harassment to treat someone less favourably because they have either rejected, or submitted to, sexual harassment.

10.2 The Trust and its Schools will not tolerate harassment for any reason. Further information relating to the following types of harassment can be found in the relevant Trust and School policies[2] below:

10.2.1 Harassment relating to a Protected Characteristic by a pupil is likely to be contrary to the Schools' Anti-Bullying Policy and Behaviour Policy.

10.2.2 Sexual harassment by a pupil is also contrary to the Schools' Anti-Bullying Policies and Behaviour Policies. The Trust and its Schools' response to sexual harassment is set out in the Trust's Safeguarding and Child Protection Policy and in each School's safeguarding procedures as well as in the Trust's Harmful Sexual Behaviour/Child-on-Child Abuse Policy.

11 Victimisation

11.1 Victimisation may occur where a person is treated less favourably than otherwise may be the case, because of some action (referred to as a "protected act") that they have taken, that they may take or that they are believed to have taken in connection with the Equality Act 2010. Protected acts are, broadly, any actions taken by a person in good faith in connection with the Equality Act, such as making or supporting an allegation of discrimination or harassment.

11.2 It is also unlawful to victimise a child for anything done in relation to the Equality Act by their parent or sibling.

11.3 It is important that no one is afraid to raise genuine concerns about discrimination because of fear of retaliation. Further information may be found in the Schools' Anti-Bullying Policies and Behaviour Policies and also in the Trust's Whistleblowing Policy.

12 Admission

12.1 **Applicants:** The Trust Schools accept applications from, and admits pupils irrespective of their sex, gender reassignment, race, disability, sexual orientation, pregnancy and maternity, or religion or belief or special educational needs **(**SEN**)**. The Schools will not discriminate on any of these grounds in respect of the terms on which a place is offered.

12.2 **Admissions arrangements:** The Trust Schools' admissions arrangements (which includes their Admission Policies and all other admission-related documents) reflect the Trust Schools' approach towards equal opportunities for prospective pupils and is consistent with this Policy.

13 Education and Associated Services

13.1 **Equal access:** The Trust Schools will afford all pupils equal access to all benefits, services, facilities, classes and subjects including all sports, irrespective of their sex, gender reassignment, race, disability, sexual orientation, pregnancy and maternity or religion or belief or SEN, subject to overriding considerations of safety and welfare.

13.2 **Positive action:** The Trust Schools may afford pupils of a particular racial group, or pupils with a disability or SEN, 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.

13.3 **Exclusions:** The Trust Schools will not discriminate against any pupil by excluding them from the Schools, or by subjecting them to any other detriment, on the grounds of their sex, gender reassignment, race, disability, sexual orientation, pregnancy and maternity, or religion or belief, or SEN. Before any decision to exclude a pupil is taken, the HT will consider whether the decision may be discriminatory.

13.4 **Teaching and educational materials:** Efforts are made to recognise and be aware of the possibility of bias (for example, on the grounds of sex or race), so that this can be eliminated in both the Trust Schools' teaching and learning materials and teaching styles. Materials are carefully selected for all areas of the curriculum so as to avoid stereotypes and bias. Attainment gaps are considered where these exist between certain groups of pupils.

13.5 **Pupil interaction:** All pupils are encouraged to work and play freely with, and have respect for, all other pupils, irrespective of their sex, gender reassignment, race, disability, sexual orientation, religion or belief, or pregnancy and maternity or SEN, subject to considerations of safety and welfare. Positive attitudes are fostered towards all groups in society through the curriculum and ethos of the Trust Schools, and pupils will be encouraged to question assumptions, stereotypes and negative behaviours and practices. The Trust Schools' PSHE and RSE curricula encourage respect for other people, with particular regard to the Protected Characteristics.

13.6 **Bullying:** Bullying is always unacceptable and will not be dismissed as being normal or as "banter", "just having a laugh", "boys being boys", "girls being girls" or simply "part of growing up". The Trust Schools will not tolerate bullying (including cyberbullying, prejudice-based bullying and discriminatory-based bullying) for any reason and adopts a zero-tolerance approach. The Trust Schools are aware of its duty under the PSED to foster good relations, and have consideration to the following types of bullying that may disproportionately affect those with a Protected Characteristic:

13.6.1 bullying relating to race, religion, belief or culture;

13.6.2 bullying related to SEN, learning difficulties or disabilities;

13.6.3 bullying related to appearance or health conditions;

13.6.4 bullying relating to sexual orientation;

13.6.5 bullying of young carers or looked after children or otherwise related to home circumstances;

13.6.6 sexist or sexual bullying or bullying related to gender reassignment.

Refer to each Trust Schools' Anti-Bullying Policies and Behaviour Policies.

14 School Uniform

14.1 The Trust's Uniform Policy and the specific uniform requirements of each Trust School are consistent with this Policy**:** The same Uniform Policy and individual School uniform requirements apply equally to all pupils, irrespective of their sex, gender reassignment, race, disability, sexual orientation, pregnancy and maternity, or religion or belief or SEN, subject to considerations of safety and welfare. However, the Trust Schools will consider reasonable requests to alter the school uniform, for example, for genuine religious requirements and reasonable adjustments for disabled children.

14.2 **Symbols of faith:** Certain hairstyles, items of jewellery (such as the Kara bangle worn by Sikhs) 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 Trust's Uniform Policy and individual Trust School uniform requirements (for example, in respect of the School's colours). Where there is uncertainty as to whether an item may be worn under this section, this must be referred by the pupil or their parents to the EHT/HT, for determination, seeking advice as appropriate. Where the pupil and/or parents are unhappy with the decision made, it is open to them to submit a complaint in this respect under the Trust's Complaints Policy and Procedure.

14.3 **Disabled pupils:** Reasonable adjustments may be required to the School uniform for disabled pupils, who require them. The pupil or their parents should refer the matter to the EHT/HT to ensure that all reasonable adjustments are made to accommodate the pupil.

15 Religious Belief

15.1 **Religion:** The religious ethos, services and school timetable of the Trust Schools are set in accordance with the Christian tradition, but each Trust School 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 School community as a whole and considerations of safety and welfare.

16 Special Educational Needs and Disability

16.1 **The Trust's approach:** DET is an inclusive Trust, which welcomes members of the Trust and its Schools' communities with disabilities and SEN. The Trust maintains and drives a positive culture towards inclusion of disabled people and those with SEN in all the activities of the Schools and it will not treat a member of the Trust or School community less favourably on these grounds without justification

16.2 The Trust and its Schools will do all that is reasonable to ensure that the Schools' curriculum, ethos, culture, policies, procedures and premises are made accessible to everyone. The Trust's SEND Policy is consistent with this Policy. For a copy of this policy, please contact the School or the Trust.

16.3 **Reasonable adjustments:** The Trust and its Schools have an ongoing duty to make reasonable adjustments for disabled pupils and pupils with SEN where this falls within the definition of "disability" 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 school life, for example:

16.3.1 the curriculum;

16.3.2 classroom organisation and timetabling;

16.3.3 access to School facilities;

16.3.4 clubs and visits;

16.3.5 school sports; and

16.3.6 the Trust/School policies.

16.4 Reasonable adjustments may typically include:

16.4.1 allowing extra time for a dyslexic child to complete a test or public examination;

16.4.2 providing examination papers in larger print for a child with a visual impairment;

16.4.3 rearranging (but not reducing) the timetable to allow a pupil to attend a class in an accessible part of the building;

16.4.4 arranging a variety of accessible sports activities.

16.5 The Equality Act 2010 requires all schools to provide auxiliary aids and services for disabled pupils as part of a duty to make "reasonable" adjustments. The Trust Schools will carefully consider any proposals and will not unreasonably refuse to provide such aids and services.

16.6 As well as providing educational services, the Trust Schools provide services to the public, for example at:

16.6.1 open days;

16.6.2 parents' evenings;

16.6.3 facilitating meetings with parents, for example as part of the Trust's complaints procedures or as part of the statutory exclusions process;

16.6.4 concerts and plays;

16.6.5 use of sports facilities.

16.7 When providing such services, the Trust Schools will make reasonable adjustments to ensure that disabled people are able to use the Schools' services as far as is reasonable to the same extent and standard as non-disabled people.

16.8 For reasonable adjustments for staff, please refer to the Equality, Diversity and Inclusion in Employment Policy.

16.9 **Informing the School:** Once a place has been accepted for a prospective pupil, the School will ask all parents to complete an enrolment form. This will include questions to gather key information in relation to a prospective pupil's SEN or learning difficulty at their child's previous school or elsewhere. Confidential information of this kind will only be shared within the School on a "need to know" basis to ensure that teachers are given any necessary information about a child's SEN and learning difficulties, and that teaching practices are appropriate.

16.10 Parents should notify the School immediately if their child's progress or behaviour causes concern so that the School can discuss and agree a strategy with the parents.

16.11 At all stages, the School and the SENDCo will work in consultation with the parents and pupil to seek to ensure that all support and outcomes are appropriate to the pupil's needs.

16.12 The SENDCo(s) at each Trust School are as detailed here:

- Chase High School (CHS)
- Mrs. Daisy Ringrose – daisy.ringrose@chasehigh.org – Key Stage 4 and Key Stage 5;
- Hogarth Primary School (HPS)
- Mrs. Lauren King – lking@hogarth.essex.sch.uk
- Kelvedon Hatch Community Primary School (KHCPS)
- Mrs. Althea Chalkley – sendco@kelvedonhatch.essex.sch.uk
- Larchwood Primary School (LPS)
- Mrs. Dawn Jaycock – senco@larchwood.essex.sch.uk
- St. Martin's School (SMS)
- Ms Olufunke Bamigbele - sendco@st-martins.essex.sch.uk.

16.13 **Access:** The Trust Schools will 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 Trust Schools will take steps to improve access for disabled users of the premises. Each Trust Schools has an Accessibility Plan, which is kept under review and revised as necessary. The Accessibility Plans are available on request from the School Business/Office Manager.

17 Pupils with Education, Health and Care Plans

17.1 The Trust's SEND Policy includes details about the welfare and educational provision for pupils with EHCPs.

18 Pupils with English as an Additional Language

18.1 Pupils with English as an additional language (EAL) will receive additional learning support if necessary. The Trust Schools will consult with the pupil and the parents, as appropriate. The

Trust Schools have appropriate welfare support for all such pupils through their designated EAL teachers and their general pastoral support systems.

18.2 **Language and Culture:** The Trust Schools will ensure that:

18.2.1 home-school links are made to involve parents directly in the work of the School;

18.2.2 interpretation and translation services are made available as quickly as possible;

18.2.3 links are established within the local community;

18.2.4 staff work effectively with other local services;

18.2.5 learning support for ethnic minority pupils is efficient and effective;

18.2.6 provision is made for spiritual, moral, social and cultural education, supported by appropriate resources and information; and

18.2.7 pupils' names should be accurately recorded and correctly pronounced. Pupils should be encouraged to accept and respect names from cultures other than their own.

19 Provision for Pupils with Particular Religious, Dietary, Language or Cultural Needs

19.1 All Trust Schools adopt a whole-school approach to supporting pupils with particular religious, dietary, language or cultural needs.

All Trust Schools cater for the different dietary needs of pupils, whether these are related to religious, cultural or medical needs.

All Trust Schools are non-denominational and children from all religions are welcome. All Trust Schools ensure that pupils of all religions are provided with opportunities to practice their religious beliefs.

All Trust Schools ensure that the language and cultural needs of all pupils are fully met.

20 Training

20.1 The Trust Schools ensure that regular guidance and training is arranged on induction and at regular intervals thereafter so that staff and volunteers understand what is expected of them by this Policy and have the necessary knowledge and skills to carry out their roles.

20.2 The level and frequency of training depends on the role of the individual member of staff.

20.3 The Trust and its Schools maintain records of all staff training.

20.4 Staff will be trained to understand the types of disabilities and how to deal with pupils who are disabled. Staff will not be expected, unless medically qualified or trained, to administer medication.

21 Risk Assessment

21.1 Where a concern about a pupil's welfare is identified, the risks to that pupil's welfare will be assessed and appropriate action will be taken to reduce the risks identified.

21.2 The format of risk assessment may vary and may be included as part of the Trust School's overall response to a welfare issue, including the use of individual pupil welfare plans (such as

behaviour, EHCPs, as appropriate). Regardless of the form used, the School's approach to promoting pupil welfare will be systematic and pupil focused. Please see clause 6 for details of the individuals with responsibility for carrying out, monitoring, implementing and reviewing the effectiveness of risk assessments under this Policy. Refer also the Trust's Risk Assessment Policy for Pupil Welfare.

22 Record Keeping

22.1 All records created in accordance with this Policy are managed in accordance with the Trust's policies that apply to the retention and destruction of records.

22.2 The information created in connection with this Policy may contain personal data. The School's use of this personal data will be in accordance with Data Protection law. The Trust has published Privacy Notices on its website, which explain how the Trust and its Schools will use personal data.