



EQUAL OPPORTUNITIES, EQUALITY & DIVERSITY POLICY (HS40)

APPLIES TO:	All staff. visitors. volunteers. contractors. governors. guests. residents
AISL RESPONSIBILITY:	Group Director of HR
LAST UPDATED:	1 st August 2023
REVISIONS: (Reviewer to enter initials and date)	OW January 2025



1. SCOPE & PURPOSE

1.1. Scope

This Policy applies to all employees of Asia International School Limited (AISL), Harrow International Management Services (HIMS), Harrow International China Management Services (HICMS), each AISL Harrow School.

In addition to this Policy, geographical regulatory requirements must be adhered to and employees should consult with the local Director of HR if more information on specific details is required.

1.2. Purpose

This Policy aims to:

- ensure that all members of the AISL community are fully included and do not face any form of discrimination. In keeping with our identity as an international school, we aim not just to accommodate diversity, but to celebrate it.
- affirm that AISL, and its schools, are equal opportunity spaces and employers, committed to maintaining an environment free from discrimination and harassment.
- make all employees aware of our objectives in relation to equal opportunities. All employees are responsible for complying with respective discrimination laws in each location.

2. AIMS

2.1. At AISL we aim to:

- be inclusive of all members of the community;
- create an environment where an individual's background and lifestyle does not affect perceptions of them as a member of the community or affect their opportunities for development and advancement;
- ensure that there is an understanding of the needs of minority groups within the community;
- ensure that the education provided emphasises respect for, and understanding of, difference;
- ensure that all its members are especially vigilant in respect of discrimination or bullying based around age, gender, race, religious affiliation, sexuality, physical appearance, domestic circumstance or any other protected characteristic.

2.2. Principles

- a) No member of staff, no student and no member of the school community will be disadvantaged because of gender, identity, sexuality, disability, race, religion or other grounds such as age and marital status.
- b) Discrimination can be direct and is any form of less favourable treatment based on personal characteristics such as gender, disability, race, or other grounds such as age.
- c) It is the responsibility of everyone to ensure that he or she plays a part in eliminating discrimination. All members of staff therefore have a personal responsibility to comply with and to ensure compliance with this Policy.
- d) Career advancement and promotions are based on merit, performance and qualifications. Line managers, especially those involved in recruitment, selection, training and promotion, have particular responsibility for the practical implementation of this policy. No line manager should do anything or omit to do anything which would contravene this Policy, either explicitly or implicitly. In addition, line managers must take appropriate steps to eliminate harassment and bullying in accordance with the Harassment Policy.
- e) AISL and the School/Centre will treat any conduct in breach of this Policy as a serious matter.

3. PROCEDURES

- 3.1. All staff are responsible for ensuring that:
 - their language and behaviour does not cause discomfort or embarrassment to others;
 - they are considerate of those who exhibit any protected characteristic;
 - workflows and procedures do not discriminate, intentionally or unintentionally against those with protected characteristics;
 - communication is respectful between all employees regardless of title or level;
 - this Policy is implemented in their day-to-day work and their dealings with colleagues, members of the School community and visitors;
 - they notify their line manager or senior management of any concerns with regard to the conduct of other employees.
- 3.2. In addition, mindful that equality, diversity and inclusion also includes students, teachers are responsible for ensuring that:
 - methods, language, questioning and classroom management includes and engages all students;
 - suitable resources are chosen which motivate and are sensitive to different groups, cultures and backgrounds;
 - stereotypes and what are thought to be stereotypical activities are effectively challenged;
 - they are aware of possible cultural assumptions and bias within their own attitudes.

- 3.3. Senior leaders are responsible for ensuring that appropriate arrangements are put in place to monitor the performance of potentially disadvantaged students. Measures include:
- identifying and investigating any patterns with regard to exclusions and poor attendance in respect of particular groups;
 - monitoring differences in student attitudes to work and towards each other, with a view to identifying any significant patterns;
 - addressing issues such as sexual or racial harassment, bullying and hostile behaviour and ensuring that there are effective procedures for reporting and responding to such incidents;
 - Recognizing unacceptable behaviour and taking immediate appropriate action;
 - ensuring that the performance of different groups of students is monitored and evaluated so that the particular needs of different students are met;
 - providing staff development to raise awareness of differences in need and to promote strategies to raise achievement in all students;
 - creating an environment which affirms and supports ethnic, cultural, religious and social diversity and effectively promotes good personal, community and race relations;
 - reviewing the curriculum annually to ensure that global citizenship, with its emphasis on celebrating difference and diversity, is given the status it deserves.
- 3.4. Additional provisions:
- The stock of books in the School library/ies is regularly augmented to include literature that celebrates difference and diversity;
 - The school supports the work of a staff-run diversity committee and a student-led diversity group
 - The School's recruitment and retention policy and practice does not discriminate against anyone exhibiting a protected characteristic;
 - The School's dress code for students and adults is conservative, but there are reasonable accommodations for students and staff who, for religious or medical reasons, for example, wish to dress differently.

4. GRIEVANCE POLICY AND HARASSMENT POLICY

- 4.1. Any employee, student or community member who considers that they have a grievance in matters related to this Policy can raise it through *Internal Grievance Policy (including Workplace Bullying) (HS45)* or *External Complaints & Appeals Policy (HS7)*.

5. COMPLAINTS PROCEDURE

- 5.1. If any member of the community feels that they have not been properly dealt with, they should write to the Head and/or the Chair of the Board of Governors as appropriate.

6. RECRUITMENT

The terms and spirit of this Policy apply to all recruitment decisions and should be read in combination with the Recruitment Policy:

- 6.1. The purpose of the recruitment process is to ensure that the most suitable person (in terms of experience and qualifications) is selected for the position.
- 6.2. All recruitment decisions are made on the basis of consistent selection criteria (see Recruitment Policy).
- 6.3. Candidates will be assessed against the criteria set out in the job descriptions and these will be non-discriminatory. This will include ensuring that qualification and experience requirements are appropriate to the post concerned.
- 6.4. A commitment to equal opportunities in recruitment, and terms of employment, salaries and benefits, will be reflected in recruitment advertisements and literature, application forms and in the selection criteria and the requirements set in relation to a particular position.
- 6.5. Staff will enjoy access to the same terms and conditions commensurate to their employment status, regardless of race, religion, gender or sexual orientation.

7. DISABILITY DISCRIMINATION

- 7.1. Where an employee or student has a disability, and based on the requirements of that jurisdiction, the School is to make reasonable accommodation in order to assist the employee/student to fulfil the inherent requirements of the job/full access an education in the School.

8. GENDER IDENTITY & TRANSITION

- 8.1. Gender identity is a core aspect of personal identity. This policy affirms the basic principle that only an individual can determine their own gender identity. This approach is consistent with current best practices and UK law. Schools should avoid requiring medical, legal, or other ‘proof’ in order to respect a student’s gender identity.
- 8.2. This policy also affirms the commitment of all Harrow-branded international schools to making each school a safe place for students to transition between gender identities and to feel comfortable expressing non-binary identities.
- 8.3. It is recognised that in some locations in which Harrow-branded international schools operate legal statutes may prohibit full implementation of this policy (insofar as gender identity and

transition is concerned). However, schools should endeavour to implement the principles outlined below to the fullest extent possible as allowed by context.

Definitions

8.4. These definitions are provided not for the purpose of labelling members of the school community but rather to assist in understanding this policy. Students may or may not use these terms to describe themselves or their experiences.

- **Gender Expression:** The manner in which a person represents or expresses gender to others, often through behaviour, clothing, hairstyles, activities, voice, or mannerisms.
- **Gender Identity:** A person's deeply held knowledge of their own gender, which can include being female, male, another gender, or no gender. Gender identity is an innate and inherently fluid part of a person's identity. One's gender identity can be the same or different than the gender assigned at birth. The responsibility for determining an individual's gender identity rests with the individual. Children typically begin to understand their own gender identity by age four, although the age at which individuals come to understand and express their gender identity may vary based on each person's social and familial development.
- **Gender Nonconforming:** A term sometimes used to describe people whose gender expression differs from stereotypical expectations, such as 'feminine' boys, 'masculine' girls, and people who are perceived as androgynous in some way. Most gender nonconforming people are not transgender. For example, a non-transgender girl who has short hair and likes sports might be considered gender nonconforming. The term 'gender nonconforming' is also sometimes used to refer to people whose gender identity is not male or female.
- **Nonbinary/Gender Queer:** These are terms often used to describe people whose gender is not exclusively male or female, including those who identify with a gender other than male or female, as more than one gender, or as no gender
- **Sexual Orientation:** A person's romantic and/or physical attraction to people of the same and/or another gender, such as being straight, gay, bisexual, or asexual. Transgender and gender nonconforming people may have any sexual orientation.
- **Transgender:** An adjective describing a person whose gender identity is different from that traditionally associated with the gender they were thought to be when they were born. A transgender girl is a girl who was thought to be male when she was born. A transgender boy is a boy who was thought to be female when he was born. Some transgender people have a gender that is neither male nor female, and may use terms like non-binary to describe their gender.

- **Transition:** The process in which a person begins to live according to their gender identity, rather than the gender they were thought to be at birth. Transition is a process that is different for everyone, and it may or may not involve social, legal, or physical changes.

Language

8.5. To recognise and respect gender differences, making our schools a safe space for students and staff regardless of their gender identity, each school will use non gender-specific language and will avoid uses of language which discriminate against individuals with nonbinary identities.

8.6. This will include, but not be limited to, the following examples:

- Admissions forms should refer to Guardians and Caretakers, not just Parents.
- Students should not be asked to line up/organise by boys and girls.
- Teachers should avoid gendered language such as “OK guys”, “Boys and Girls” – using gender neutral pronouns such as “Students” or their Tutor/House group instead.
- Recognising that dynamics are different in every family, not every child will be raised by heterosexual parents, they may be raised by one parent, two same sex parents, Grandparents, or by extended family - “Grown-ups”, Guardians and caregivers is to be preferred over “Mum and Dad” or “Mummy and Daddy” etc.
- The assumption that every student is heterosexual should be avoided: that boys will only have Girlfriends and vice versa; “partners” is the preferred term.

Names, Pronouns, and School Records

8.7. Every student has the right to be addressed by a name and pronouns that correspond to the student’s gender identity. Regardless of whether a transgender or gender nonconforming student has legally changed their name or gender, the school will allow such students to use a chosen name and gender pronouns that reflect their identity.

8.8. It is recommended that school staff privately ask transgender or gender nonconforming students how they want to be addressed in class and in the school’s communication with the student’s parents or guardians.

8.9. Some transgender and gender nonconforming youth may request to use “he” or “she” pronouns, while others may feel most comfortable being addressed by gender-neutral pronouns such as “they” or “ze” or just referred to by their names (without pronouns). If the student has previously been known at school by a different name, senior leadership will direct school personnel to use the student’s chosen name and appropriate pronouns. To ensure consistency staff, every effort will be made to immediately update student education records (such as attendance reports, class registers, school IDs, transcripts, electronic records, etc.) with the student’s chosen name and appropriate gender markers.

8.10. In some circumstances, it may be required by law to record a student's name or gender as it appears on documents such as a current birth certificate. In those instances, school staff shall record this information in a separate, confidential file to avoid the inadvertent disclosure of the information.

Dress Code

8.11. Schools may enforce dress codes pursuant to policy, but any such dress code may not be enforced based on gender or gender stereotypes.

8.12. Students shall have the right to dress in accordance with their gender identity and expression, including maintaining a gender-neutral appearance within the constraints of the dress codes adopted by the School.

8.13. Regardless of gender-identification, trousers (or shorts) must be an option for all students.

8.14. School staff shall not enforce a school's dress code more strictly against transgender and gender nonconforming students than other students.

Access to Gender-Segregated Activities and Facilities

8.15. In changing rooms that involve undressing in front of others, transgender students who want to use the locker room corresponding to their gender identity shall be provided with the best possible available accommodation.

8.16. Based on availability and appropriate redress to privacy concerns, such accommodations could include, but are not limited to:

- Use of a private area (e.g., a bathroom stall with a door; an area separated by a curtain; with due concern for safeguarding, a private staff changing facility)
- A separate changing schedule (either utilising the changing room before or after other students);
- Use of a nearby private area (e.g., a nearby bathroom, a nurse's office).

8.17. Any student who is uncomfortable using a shared gender-segregated facility, regardless of the reason, shall, upon the student's request, be provided with a safe and non-stigmatizing alternative.

8.18. For expeditions and trips, efforts are to be made to sensitively accommodate students according to their gender identification.

Student Transitions

8.19. The school shall accept the gender identity that each student asserts.

8.20. There is no test, medical or mental health diagnosis or treatment threshold that students must meet in order to have their gender identity recognised and respected. The assertion may be evidenced by a manifest desire to be consistently recognised as the sex consistent with their gender identity.

8.21. Students ready to socially transition may initiate a process to change their name, pronoun, attire, and access to gender-related programs, activities, and facilities consistent with their gender identity. Each student has a unique process for transitioning. The school shall customise support to optimise each student's equal access to the school's educational programs and activities.

Harrow Haikou Local Variation

No local variation