North London Collegiate School Kobe

Equal Opportunities Policy (including recruitment)

Policy Lead	Principal
Reviewed By	Director of People and Operations
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AI summary

This document outlines the **Equal Opportunities Policy** for North London Collegiate School (NLCS) Kobe, which aims to create an inclusive, supportive environment for all members of the school community, including pupils and staff.

Core Vision & Legal Framework

- **Philosophy:** The school values diversity and prohibits discrimination, harassment, and victimisation across all protected traits.
- **Compliance:** The policy aligns with:
  - **UK Frameworks:** Including the Equality Act 2010 and KCSIE.
  - **COBIS Standards:** Regarding safeguarding and recruitment.
  - **Japanese Domestic Law:** Specifically MHLW mandates like the Labor Standards Act and the 2020 Harassment Prevention Laws.

Responsibilities & Scope

- **Application:** The policy applies to all school members, including leadership, pupils, parents, visitors, and all categories of employees.
- **Duties:** Leadership sets behavioral standards, while all workers must treat colleagues with dignity and avoid discriminatory practices.

Pupil Inclusion & Support

- **SEND Provisions:** The school provides reasonable adjustments for pupils with special educational needs (SEND), such as exam accommodations or accessible facilities.
- **Admissions:** Decisions regarding pupils with disabilities are made after considering all reasonable adjustments.
- **Uniform & Culture:** The uniform policy is non-binary and accommodates religious or cultural requirements, such as headwear or jewellery, provided they meet safety standards.
- **Curriculum:** Teaching resources are reviewed to prevent implicit bias and promote inclusive, non-stereotypical perspectives.

Recruitment & Employment

- **Safer Recruitment:** The school uses a transparent, objective framework, including standardized application forms and rigorous vetting (e.g., criminal record checks, reference verification).

- **Employment Equity:** The school follows the "Equal Work, Equal Pay" doctrine, preventing arbitrary disparities between different contract statuses.
- **Workplace Protections:** The school enforces a zero-tolerance policy against power harassment, sexual harassment, maternity/paternity harassment, and SOGI harassment. Retaliation against anyone filing a report is strictly prohibited.

Policy Enforcement

- **Reporting:** Breaches by pupils should follow the Complaints Procedure or be reported to the Head of Junior School or Assistant Principal (Pastoral).
- **Monitoring:** The policy is monitored annually, with breaches recorded in an Equal Opportunities Log to ensure the school climate remains inclusive.

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Policy Statement, Philosophy & Core Vision

Inspired by the core conviction that every individual within the school community possesses equal worth and dignity, North London Collegiate School Kobe (the School) is dedicated to cultivating a positive, supportive, and inclusive learning and working environment. Difference is valued, respected, and intentionally celebrated. We aim to ensure that all individuals feel secure, respected, and capable of achieving their full potential.

The School strictly prohibits discrimination, harassment, victimisation, and structural inequality across all protected traits recognised under international educational benchmarks and jurisdictionally applicable domestic laws . This policy harmonises the inclusive ethos of North London Collegiate School (NLCS) UK, the global safeguarding and operational standards of the Council of British International Schools (COBIS), and the statutory requirements of the Japanese Ministry of Health, Labour and Welfare (MHLW).

The School endeavours to create an environment in which pupils and staff give due respect to other people and their work or ideas. This policy applies to the whole School.

2. Aims and Objectives of the School

The School recognises the benefits of having a diverse school community, with individuals who value one another and the different contributions everyone can make. The School is committed to being an equal opportunities education provider and is committed to equality of opportunity for all members of the school community.

To achieve these aims, the School will:

- Ensure that all school policies, procedures, and practices conform with the principle of equal opportunities.
- Tackle inappropriate attitudes and practices amongst pupils through staff leading by example, the Personal, Social, Health and Economic (PSHE) education programme, the supportive School culture, and through the School's policies .
- Operate as a committed equal opportunities employer, taking every possible step to ensure that employees are treated equally and fairly in respect of employment matters.

- Conform with the principle of equal opportunities in terms of recruitment, selection, training, promotion, career development, discipline, redundancy, and dismissal .
- Ensure that staff and applicants for employment shall not be disadvantaged by any policies or conditions of service which cannot be justified as necessary for operational purposes .

3. Statutory and Regulatory Framework

As an international school operating within Japan while delivering a British-styled education, this policy meets a dual statutory burden :

3.1 United Kingdom Frameworks

The School has regard to and aligns with the spirit of :

- The Education (Independent School Standards) Regulations (2014) .
- The Equality Act 2010 .
- Keeping Children Safe in Education (KCSIE)
- Gender Questioning Children – Non-statutory guidance for schools and colleges in England.

3.2 COBIS & Safeguarding Frameworks

The School complies with:

- The British International Schools Safeguarding Coalition (BISSC)
- Safer Recruitment Code of Conduct .
- COBIS Accreditation Standards regarding safeguarding and recruitment safety .

3.3 Japanese Domestic Law

The School complies fully with the statutory mandates of the Japanese Ministry of Health, Labour and Welfare (MHLW), including :

- The *Labor Standards Act* .
- The *Equal Employment Opportunity Act* .
- The *Child Care and Family Care Leave Act* .
- The 2020 *Harassment Prevention Laws* (MHLW Mandates) .

4. Scope, Roles and General Responsibilities

4.1 Scope of the Policy

This policy applies to all members of the School community, including the Principal, Partnership Board, pupils, parents, visitors, and external users of school facilities.

It also applies to all of the School's employees (whether permanent, temporary, casual, part-time, or on fixed-term contracts), former employees, applicants for employment, and individuals such as agency staff, consultants, and volunteers who work at the School (collectively referred to as workers).

4.2 Responsibility of the Partnership Board

- The Partnership Board has overall responsibility for the effective operation of this policy and for ensuring compliance with the relevant statutory frameworks prohibiting discrimination

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4.3 Responsibility of Management and Leadership

Those working at a management level have a specific responsibility to set an appropriate standard of behaviour, to lead by example, and to promote the aims and objectives of the School with regard to equal opportunities.

4.4 Duty of All Workers

All workers have a duty to act in accordance with this policy, to treat colleagues with dignity at all times, and not to discriminate against or harass other members of staff, whether junior or senior to them . The School does not tolerate any discriminatory practices or behaviour and recognises that it may be held legally responsible for the acts of individual staff members .

5. Protected Characteristics and Forms of Discrimination

5.1 Protected Characteristics

The School recognises its responsibilities under the law and opposes discrimination based on protected characteristics including, but not limited to (note that some of the below are not covered by the law in Japan but the school still recognises them as such) :

- Age
- Disability
- Ethnicity, Race, or Nationality
- Gender Reassignment or Gender Identity
- Marriage and Civil Partnership
- Pregnancy and Maternity / Paternity
- Religion or Belief
- Sex or Gender
- Sexual Orientation
- Social Background
- Special Educational Needs
- Part-time or Fixed-term employment status
- The School also opposes all bullying and unlawful discrimination on the basis that a person has a special educational need or disability .

5.2 Forms of Discrimination

Discrimination may be direct or indirect, arise from a disability, and occur intentionally or unintentionally.

- **Direct Discrimination:** Occurs when an individual is treated less favourably than another individual because of a protected characteristic (e.g., rejecting a job applicant because of their race) . It also includes discrimination by association, where an individual is treated less favourably because of their connection to someone with a protected characteristic .
- **Indirect Discrimination**: Occurs where an individual is subject to an unjustified provision, criterion, or practice which puts people sharing a protected characteristic at a particular disadvantage, unless it can be objectively and legally justified .

- **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.
- **Victimisation:** Occurs when a person suffers a detriment because of a "Protected Act" (such as raising a complaint, asserting legal rights, or assisting a colleague in asserting their rights against discrimination) .
- **Harassment:**Unwanted conduct related to a protected characteristic that violates dignity or creates an intimidating, hostile, degrading, humiliating, or offensive environment .

Equal Opportunities for Pupils: Inclusion and Access

The School maintains and drives a positive culture towards inclusion of pupils with special educational needs and disabilities (SEND) in all activities of the School, and will not treat a pupil differently unless appropriate to their special need or disability .

The School will afford all pupils equal access to all benefits, services, facilities, classes, and subjects, including all sports, irrespective of their gender identity, race, disability, sexual orientation, pregnancy, religion, belief, or special educational needs . This is subject to considerations of safety and welfare.

7. Reasonable Adjustments and Support for Pupils (SEND)

7.1 Duty to Make Reasonable Adjustments

The School has a legal and moral duty to make reasonable adjustments to avoid putting disabled pupils at a substantial disadvantage compared to non-disabled pupils . Adjustments are changes made to ensure disabled pupils can participate in their education and enjoy all facilities the School provides .

7.2 Typical Reasonable Adjustments

Reasonable adjustments will be made in consultation with parents and pupils, and may include :

- Arranging for a child in a wheelchair to attend an admissions interview in an accessible ground floor room .
- Allowing extra time for pupils in examinations who fulfil the Joint Council for Qualifications (JCQ) access arrangement criteria .
- Providing examination papers in larger print in accordance with JCQ guidelines .
- Rearranging academic timetables to allow a pupil to attend classes in accessible parts of the school buildings .
- Arranging a variety of accessible sports and physical activities .

7.3 Limitations on Adjustments

The School is not legally required to undertake physical alterations that are unreasonable or disproportionate, such as installing a stair-lift or constructing new ground floor facilities where alternatives can be provided . The School will monitor physical premises to improve accessibility where possible and proportionate.

7.4 Information Sharing and Confidentiality

- Parents must notify the Principal in writing if they are aware or suspect that their child has special educational needs or a disability.
- This information must be declared on the Registration Form.
- Parents must provide copies of all written reports and relevant documents on admission. This confidential information is shared strictly on a "need-to-know" basis, respecting any parental request to keep the disability confidential .

7.5 Admissions Decisions and Reasonable Adjustments

Applications are considered on the basis that reasonable adjustments have been made. The School will not offer a place if, after all reasonable adjustments, it is professionally determined that the School cannot adequately provide for the child's physical and educational needs.

7.6 Existing Pupils who Develop Needs

If an existing pupil is found to have a disability or special educational need, the School will do all that is reasonable to assist. If, in the professional judgement of the Principal and after consulting parents, the School cannot adequately meet the pupil's needs even after all reasonable adjustments, parents will be asked to withdraw the pupil. In this case, no fees in lieu of notice will be charged, the acceptance deposit will be fully returned, and the School will assist parents in finding an alternative placement .

8. Pupil Uniform, Cultural and Religious Observances

8.1 School Uniform Policy

Pupils are required to wear the School uniform. School uniform options are designed to be non-binary, avoiding historical gender constraints and allowing pupils to select the uniform options that align comfortably with their identity .

8.2 Variations for Religious and Cultural Grounds

- The Principal or Head of Junior School will consider requests from parents and pupils regarding variations to the uniform on genuine religious, cultural, or identity grounds .
    - Certain items of jewellery (such as the Sikh Kara bangle) and specific headwear (such as headscarves) may be worn when genuinely based on manifesting religious beliefs, racial beliefs, or identity .
    - Uniform variations are subject to considerations of safety and welfare .
    - Where uncertainty arises, the matter must be referred to the Principal or Head of Junior School, whose decision will be final, subject to the School’s Complaints Procedure .
    - Reasonable adjustments to uniforms will be made for disabled pupils who require them .

8.3 Religious Freedoms

The School fully respects the right and freedom of individuals to worship in accordance with other faiths, or no faith. This is subject to individuals respecting the rights and freedoms of the school community as a whole, as well as general safety and welfare . Authorized absence is granted for religious observances, and the catering department accommodates specific dietary and cultural requirements as far as reasonably possible .

9. Access to Curriculum, Sports and Support (EAL)

9.1 Curriculum Materials and Teaching Styles

The School actively reviews curriculum resources and teaching styles to recognise, eliminate, and prevent implicit bias (such as gender or racial bias) . Materials are carefully selected across all academic departments to avoid stereotypes and ensure representation of diverse, non-stereotypical roles .

9.2 Pupil Interaction and Culture

All pupils are encouraged to work and play freely with, and have respect for, all other pupils irrespective of their gender identity, race, disability, sexual orientation, religion, belief, pregnancy, or special educational needs. Positive, inclusive attitudes are fostered through the curriculum and school ethos, and pupils are encouraged to actively question stereotypes and assumptions .

9.3 English as an Additional Language (EAL) Support

Pupils with EAL are expected to be able to access the curriculum in English . The School will consult with the pupil and parents, and provide advice if additional language support is required, in accordance with the English as an Additional Language Policy .

10. Reporting, Recording and Investigating Pupil Breaches

10.1 Reporting a Breach

- Parents or guardians who believe they or their child have received less favourable treatment under this policy, or that the policy has been breached to their detriment, should raise the matter through the School's Complaints Procedure .
- General questions, concerns, or reports of breaches that do not constitute a formal parent complaint should be directed to the Head of Junior School or the Assistant Principal (Pastoral) .
- All allegations and complaints will be treated in strict confidence, handled urgently, and investigated thoroughly .

10.2 Resolution and Disciplinary Action

- Proven discriminatory behaviour or breaches of this policy by pupils will be dealt with under the School's Behaviour Policy .
- All reported breaches and incidents of discrimination will be recorded in the official Equal Opportunities Log . This log is reviewed annually by the Head of Junior School and the Assistant Principal (Pastoral) to monitor school climate and update preventative measures .

11. Non-Discriminatory and Safer Recruitment Standards

The School operates a unified, objective, and transparent recruitment framework to eliminate implicit bias and discrimination from the selection pipeline while maintaining absolute compliance with global safeguarding practices .

11.1 Job Specifications & Advertising

All job descriptions, advertisements, and person specifications focus strictly on the objective qualifications, skills, competencies, and aptitudes required for the role. Retrospective, restrictive, or culturally biased criteria that could indirectly disadvantage applicants of a specific nationality, age, gender identity, or background are strictly prohibited. Recruitment procedures are reviewed regularly to ensure they reach sufficiently diverse sectors of the community .

11.2 Safer Recruitment Standards (COBIS & Safeguarding Compliance)

To ensure the protection of children, candidate evaluations are subjected to rigorous vetting standards that run concurrently with non-discriminatory checks :

- Standardised Application: All applicants must submit a standardised, comprehensive application form containing explicit safeguarding questions . Curriculum Vitae (CVs) will not be evaluated in isolation accepted without an application form.
- Interview Panels: Every selection panel will feature at least one member with active, verified certification in Safer Recruitment Practices .
- Exhaustive Vetting: Successful candidates undergo multi-layered background checks including identity verification, global criminal record checks (International Child Protection Certificates or local Japanese Criminal Record Certificates), explicit qualification verification, and a minimum of two professional references, one of which must be the candidate's most recent employer working with children .
- Reference Verification: All professional references must be verified by telephone before the candidate begins work, with the verification logged and initialled on the Single Central Record (SCR) .

11.3 Japanese Employment Law Compliance

In accordance with the mandates of the Japanese Ministry of Health, Labour and Welfare (MHLW), the recruitment process enforces specific legal safeguard :

- Maternity and Family Protections: Interviewers are strictly prohibited from probing applicants regarding marital status, intentions to become pregnant, family planning, or potential reliance on child care leave .
- Elimination of Irrational Disparity: Under Japan's "Equal Work, Equal Pay" doctrine, selection, compensation structures, and contracts are evaluated to prevent arbitrary disparities between full-time permanent staff ("Regular Employees") and fixed-term, part-time, or dispatched personnel .

12. Workplace Harassment and Bullying Prevention (MHLW Compliant)

The School maintains a zero-tolerance position regarding harassment, bullying, and systemic inequality. In strict alignment with Japanese Harassment Prevention Laws, these protections explicitly cover not only current employees but also job applicants, interns, student teachers, and external contractors .

The School explicitly prohibits, investigates, and disciplines the following variants of misconduct :

- Power Harassment: Conduct whereby an individual utilises their position of authority, hierarchy, or specialized knowledge to inflict psychological or physical abuse, public humiliation, social isolation, or assigning structurally degrading tasks outside the scope of employment necessity .

- Sexual Harassment : Unwelcome sexual advances, remarks, physical contact, or digital communications that create a hostile, intimidating, or offensive workplace environment .
- Maternity/Paternity Harassment. Prejudicial treatment, unfavorable performance evaluations, demotions, or systematic exclusion targeted at individuals requesting or utilizing statutory maternity leave, child care leave, or nursing care adjustments .
- SOGI Harassment & Outing: Malicious or derogatory conduct concerning an individual's Sexual Orientation or Gender Identity (SOGI). This includes "outing"—the unauthorized disclosure of an individual's private sexual orientation or gender identity to peers or third parties .
- Customer Harassment: In compliance with modern MHLW frameworks, the School actively protects its personnel from abusive, fraudulent, or profoundly unreasonable demands made by external actors, including patrons, parents, or guardians .

12.1 Legal Mandate: Retaliation Prohibition

Any form of retaliatory measure—including adverse contract renewals, poor performance reviews, demotion, or social ostracization—against a staff member, applicant, or contractor for filing a harassment report or acting as a witness is illegal under Japanese Labor Law and constitutes grounds for immediate termination of the retaliating party .

13. Good Faith Protection and False Allegations

Workers who make allegations in good faith will not be victimised or treated less favourably. False allegations of a breach of this policy made in bad faith will be dealt with under the School's Disciplinary Policy and may result in disciplinary action up to termination of employment.

14. Staff Appraisals, Training, Promotion and Conditions of Service

14.1 Training and Promotion

Staff training needs are identified through regular staff appraisals . All workers are given equal opportunity and access to training to enable them to progress within the organisation, with all promotion decisions based strictly on merit .

14.2 Conditions of Service

The School's conditions of service, benefits, and facilities are reviewed regularly to ensure they are available to all workers without unlawful obstacles.

14.3 Staff Disabilities and Workplace Adjustments

Staff are encouraged to inform the Chief Operating Officer or their Head of Department if they are disabled or become disabled during their employment to enable the School to support them .

- Workers may request reasonable adjustments to working conditions or job duties .
- The HR team will consult with the employee and, where appropriate, medical advisers .
- Adjustments will be accommodated where possible and proportionate to the needs of the job .

- If an adjustment cannot be accommodated, the School will provide the employee with written reasons for the decision .
- The School will monitor physical premises to improve access for disabled employees.

14.4 Monitoring Contract Status

The School will monitor the conditions of service and progress of fixed-term and part-time employees to ensure they receive appropriate access to benefits, training, promotion, and permanent vacancies .

15. Policy Monitoring

The Principal and Senior Team will regularly monitor and evaluate the effectiveness of this policy and associated procedures .