



# Anti-Discrimination Policy

## Document Control

Item	Detail
Document Title	Anti-Discrimination Policy
School	Grace Academy High School
Governing Entity	Grace Academy Foundation
School Type	Independent, co-educational, English-medium school
School Phase	Grades 8–12
Registered Office of Governing Entity	31 Tracy Watts Road, Manors, Pinetown, KwaZulu-Natal, 3610
Approval Date	24 September 2024
Effective Date	25 January 2025
Review Date	24 January 2028
Approved By	GOVERNING BOARD / SCHOOL GOVERNING COUNCIL
Policy Custodian	Executive Principal / Head of School

## 1. Purpose

Grace Academy High School is committed to a school culture in which every learner, staff member, parent, guardian, volunteer, service provider, and visitor is treated with **dignity, fairness, and respect**.

This policy gives formal effect to the school's stated commitment to:

- a **safe, orderly, and inclusive** school culture;
- **fair and non-discriminatory treatment** of learners, staff, and families;
- the rejection of **unfair discrimination, harassment, victimisation, and exclusion**; and
- alignment with the **Constitution of the Republic of South Africa**, applicable education law, and the governance framework of **Grace Academy Foundation**.

This policy also responds to the Umalusi self-evaluation requirement for a **policy on anti-discrimination** and must be read together with the school's ethos statement, admission policy, learner code of conduct, teacher code of conduct, transformation policy, and grievance and disciplinary procedures.



## 2. Scope

This policy applies to:

- all learners;
- all employees, including educators, administrators, support staff, and school leadership;
- members of the Governing Board / Council when acting in relation to the school;
- parents and guardians in their interactions with the school community;
- volunteers, coaches, tutors, contractors, and service providers; and
- visitors participating in school activities or present on school premises.

This policy applies:

- on school premises;
- during classes, meetings, sport, cultural activities, assemblies, camps, and excursions;
- in transport arranged by or on behalf of the school;
- in online, digital, and social media environments connected to school operations; and
- in any off-site context where conduct has a material effect on the school environment or the dignity, safety, or equal treatment of a member of the school community.

## 3. Foundational Principles

Grace Academy High School is a Christian values-based school and seeks to embody:

- **respect for human dignity;**
- **honesty and accountability;**
- **compassion and service;**
- **fairness and inclusion;** and
- **lawful and just treatment** of all persons.

In line with the school's ethos and constitutional commitments:

- all persons must be treated fairly and courteously;
- difference must never be used as a basis for humiliation, exclusion, or prejudice;
- discipline and school rules must be applied **consistently and justly;**
- the school may maintain its Christian identity and values while operating **lawfully, fairly, and inclusively** within the South African context; and
- all complaints of discrimination, harassment, or victimisation must be handled promptly, seriously, and impartially.



## 4. Policy Statement

Grace Academy High School prohibits:

- **unfair discrimination;**
- **harassment;**
- **victimisation or retaliation;**
- **bullying rooted in bias or prejudice;** and
- any exclusionary or degrading conduct inconsistent with the dignity of the individual and the values of the school.

The school will take reasonable steps to:

- prevent discrimination and harassment;
- provide accessible reporting channels;
- protect complainants and affected persons from further harm;
- investigate complaints fairly and promptly;
- impose appropriate corrective, restorative, disciplinary, or contractual consequences;
- maintain confidentiality to the extent reasonably possible; and
- monitor patterns and risks in order to improve school culture and compliance.

## 5. Definitions

### 5.1 Unfair Discrimination

Any act or omission, policy, rule, decision, practice, or conduct that imposes disadvantage, exclusion, humiliation, or unequal treatment on a person or group on a prohibited or analogous ground, without lawful and fair justification.

### 5.2 Harassment

Unwanted conduct that is offensive, intimidating, hostile, degrading, humiliating, or harmful, and that is connected to a prohibited ground or otherwise undermines the dignity, wellbeing, or participation of a person in the school environment.

### 5.3 Victimisation / Retaliation

Any adverse action taken against a person because that person:

- reported discrimination or harassment;
- supported or accompanied a complainant;
- provided information in an investigation; or
- refused to participate in discriminatory conduct.

### 5.4 Complainant

A person who reports or raises a concern under this policy, whether on their own behalf or, where appropriate, on behalf of another person.

### 5.5 Respondent

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A person whose conduct is the subject of a complaint under this policy.

## 5.6 School Community

All persons to whom this policy applies, as listed in Section 2.

## 6. Prohibited Grounds of Unfair Discrimination

Unfair discrimination is prohibited on any ground recognised by the Constitution, law, or principles of equality and dignity, including but not limited to:

- race;
- colour;
- ethnic or social origin;
- culture;
- language;
- religion, conscience, or belief;
- gender;
- sex;
- pregnancy;
- marital status;
- family responsibility;
- sexual orientation;
- age;
- disability;
- health status;
- HIV status;
- nationality, citizenship, or immigration status;
- birth;
- socioeconomic position;
- educational support needs or learning barriers; and
- any other ground that has the effect of impairing dignity, perpetuating disadvantage, or excluding a person unfairly.

## 7. Examples of Prohibited Conduct

The following are examples of conduct prohibited by this policy:

### 7.1 Discrimination

- refusing admission, participation, support, or opportunities on unfair grounds;
- applying rules selectively to disadvantage a person or group;

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- making decisions about discipline, recruitment, promotion, workload, or access unfairly on a prohibited ground;
- excluding a learner from ordinary school participation without fair and lawful reason;
- denying reasonable consideration of barriers to learning where support is reasonably possible.

### 7.2 Harassment

- racial, sexist, religious, cultural, or disability-based slurs;
- insulting jokes, comments, gestures, or messages;
- repeated mockery or humiliation;
- degrading treatment based on background, identity, or personal circumstance;
- unwanted verbal, physical, written, or digital conduct that creates a hostile or intimidating environment.

### 7.3 Victimisation

- threatening, punishing, isolating, or disadvantaging a complainant or witness;
- reducing opportunities because a concern was reported;
- pressuring a person to withdraw a complaint;
- intimidating a learner or staff member for cooperating in an inquiry.

## 8. Rights and Responsibilities

### 8.1 Rights

Every member of the school community has the right to:

- be treated with dignity and fairness;
- learn or work in an environment free from unfair discrimination and harassment;
- report concerns without fear of retaliation;
- have complaints handled respectfully and reasonably promptly;
- be informed of process steps affecting them;
- receive interim protection where appropriate; and
- be heard before findings or sanctions are finalised, subject to the nature of the process.

### 8.2 Responsibilities of All Community Members

All members of the school community must:

- refrain from discriminatory, harassing, humiliating, or retaliatory conduct;
- promote respectful conduct across differences;
- report serious concerns or incidents promptly;
- cooperate honestly with investigations; and
- comply with any interim directions or outcomes issued under this policy.



## 8.3 Responsibilities of Staff and Leadership

Staff and leadership must:

- model respectful and non-discriminatory conduct;
- intervene appropriately when discriminatory or harassing conduct is observed or reported;
- record and escalate concerns in line with this policy;
- safeguard learners and vulnerable persons;
- keep appropriate records;
- preserve confidentiality; and
- ensure that school rules and decisions are applied fairly and consistently.

## 9. Reporting Channels

A complaint or concern may be reported through any of the following channels:

Reporter	Primary Channel	Alternative Channel
Learner	Class teacher / Grade Head / Learner Support Coordinator	Deputy Principal / Principal
Parent or Guardian	Class teacher / Grade Head / Deputy Principal	Principal / Governing Board representative where appropriate
Staff member	Line manager / Deputy Principal / Principal	Board Chair or delegated board member for complaints involving senior leadership
Visitor / Contractor	School office / Principal	Governing Board representative

### 9.1 Additional Reporting Rules

- A complaint may be made **verbally or in writing**, but serious matters should be reduced to writing as soon as reasonably possible.
- A learner may be assisted by a parent, guardian, counsellor, grade head, or trusted staff member.
- Anonymous reports may be considered, but the school's ability to act may be limited where there is insufficient information.
- Any staff member receiving a serious complaint involving a learner's safety or dignity must escalate it promptly.

## 10. Complaint Procedure

### 10.1 Initial Receipt

Upon receiving a complaint, the receiving staff member or office bearer must:

- acknowledge receipt;
- record the date, time, persons involved, and nature of the concern;

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- assess whether urgent protective measures are required; and
- refer the matter to the appropriate decision-maker.

### 10.2 Appropriate Decision-Maker

The complaint should normally be handled as follows:

- **learner-related matters:** Deputy Principal responsible for learner affairs or Principal;
- **staff-related matters:** Principal or delegated senior leader;
- **complaints against the Principal:** Board Chair or designated board member;
- **complaints implicating a board member:** Board Chair, or if the Chair is implicated, an independent delegated member or subcommittee.

### 10.3 Preliminary Assessment

The school will conduct a preliminary assessment to determine:

- whether the complaint falls within this policy;
- whether there is an immediate safety or welfare concern;
- whether informal resolution is appropriate;
- whether a formal investigation is required; and
- whether another policy or disciplinary process should also be triggered.

## 11. Informal Resolution

Informal resolution may be considered where:

- the conduct is less serious;
- the complainant agrees;
- there is no immediate safety risk; and
- the matter appears capable of resolution through clarification, apology, mediation, counselling, coaching, or directive guidance.

Informal resolution is **not appropriate** where:

- there is serious harassment, hate-based conduct, threats, coercion, repeated misconduct, or abuse of power;
- a learner or vulnerable person may be at risk; or
- a formal finding is necessary for fairness, safety, or accountability.

Any informal outcome must be recorded briefly.

## 12. Formal Investigation Process

Where formal investigation is required, the school will apply a fair process proportionate to the seriousness of the complaint.

### 12.1 Investigation Steps

The investigator or designated decision-maker will ordinarily:

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1. define the complaint and issues to be investigated;
2. notify the respondent of the complaint in sufficient detail;
3. obtain statements or interviews from the complainant, respondent, and relevant witnesses;
4. review relevant records, messages, reports, footage, or other evidence where available;
5. assess credibility, consistency, and context;
6. determine findings on a balance of probabilities; and
7. recommend or impose outcomes in line with school procedures.

### 12.2 Procedural Fairness

The process must be:

- impartial;
- timely;
- respectful;
- documented; and
- appropriate to the age and vulnerability of learners involved.

The respondent must be given a reasonable opportunity to respond before adverse findings are made, subject to urgent protective action where necessary.

### 13. Interim Protection Measures

The school may put interim measures in place before the matter is finalised where necessary to protect any person, preserve the integrity of the process, or restore order.

Possible interim measures include:

- temporary separation of learners or staff;
- changes to seating, timetables, classes, supervision, or duties;
- limiting contact between relevant parties;
- enhanced pastoral support or counselling referral;
- supervision arrangements during breaks, transport, or activities;
- precautionary leave or administrative relief from duty, where appropriate and lawful;
- restrictions on access to specific spaces, events, or communication channels.

Interim measures:

- do not amount to a final finding of guilt;
- must be reasonable and proportionate; and
- should be reviewed as the matter progresses.

### 14. Outcomes and Remedial Action

Where a complaint is substantiated, the school may impose one or more outcomes, depending on seriousness, age, risk, and context.



### **14.1 Learner Outcomes**

- counselling or restorative intervention;
- verbal or written warning;
- behavioural contract;
- apology, reflection task, or restorative meeting;
- loss of privileges;
- detention or supervised corrective measure;
- final warning;
- formal disciplinary process in terms of the learner code of conduct;
- suspension or expulsion process, where serious misconduct warrants this and due process is followed.

### **14.2 Staff Outcomes**

- counselling or guidance;
- training or corrective instruction;
- written warning;
- performance or conduct management;
- formal disciplinary action in terms of the staff disciplinary process and employment framework;
- referral to external authorities or professional bodies where required.

### **14.3 Institutional Outcomes**

Where the complaint reveals a broader risk, the school may also:

- amend a practice or procedure;
- review training and supervision;
- revise a policy;
- adjust access, accommodation, or communication measures;
- engage the Governing Board on systemic concerns.

## **15. Malicious, False, or Bad-Faith Complaints**

The school will not tolerate the abuse of this policy through knowingly false, malicious, or bad-faith allegations. If such conduct is established, appropriate corrective or disciplinary action may be taken.

This clause must not be used to discourage complaints made **honestly and in good faith**, even where a complaint is not ultimately substantiated.

## **16. Confidentiality and Records**

The school will handle complaints under this policy with an appropriate degree of confidentiality.



### **16.1 Confidentiality Principles**

- information will be shared only with those who reasonably need it to manage, investigate, advise on, or decide the matter;
- records must be stored securely;
- staff must avoid unnecessary discussion or disclosure;
- the school may disclose information where required by law, safeguarding obligations, or procedural fairness.

### **16.2 Records**

The school will maintain records of:

- complaints received;
- steps taken;
- interim measures implemented;
- findings and outcomes; and
- follow-up actions.

A secure register of complaints should be maintained by the Principal or delegated custodian.

## **17. Anti-Retaliation**

Retaliation against any person who:

- makes a complaint in good faith;
- supports a complainant;
- gives evidence;
- participates in an inquiry; or
- refuses to engage in discriminatory conduct,

is strictly prohibited.

Any act of retaliation will be treated as a serious breach of school standards and may result in disciplinary or contractual consequences, even if the original complaint is not substantiated.

## **18. Awareness, Education, and Prevention**

To make this policy effective, Grace Academy High School will take reasonable steps to build awareness and prevention into school life.

These measures include:

- induction of staff on school values, dignity, and anti-discrimination expectations;
- orientation of learners on respectful conduct, bullying, harassment, and reporting channels;
- parent communication on school standards and grievance pathways;
- integration of respect, dignity, diversity, and responsible citizenship into assemblies, Life Orientation, and school culture initiatives;

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- periodic policy communication and refresher training;
- visible reporting routes and responsible staff contacts.

## 19. Monitoring and Review

The school will monitor implementation of this policy by reviewing:

- the number and nature of complaints received;
- response times and closure rates;
- patterns by grade, activity, or context;
- repeated risk areas;
- stakeholder concerns arising from surveys, meetings, or discipline data; and
- whether additional training, policy revision, or support systems are needed.

A summary of trends, without inappropriate disclosure of personal information, should be reported periodically to the Principal and, where appropriate, the Governing Board / Council.

This policy must be formally reviewed at least every **three years**, or earlier if:

- there is a legal or regulatory change;
- a serious incident indicates a policy gap; or
- monitoring shows the need for revision.

## 20. Relationship with Other School Documents

This policy must be read together with:

- the **Vision, Mission and School Ethos Statement**;
- the **Grace Academy Foundation governance framework**;
- the **Admission Policy**;
- the **Transformation Policy**;
- the **Learner Code of Conduct**;
- the **Teacher Code of Conduct**;
- the **Health, Safety and Crisis Management Policy**;
- relevant grievance, disciplinary, and safeguarding procedures.

Where another school procedure provides a more detailed process for discipline or employment action, that procedure may be used together with this policy, provided the principles of dignity, fairness, non-retaliation, and appropriate protection are maintained.



## 21. Policy Approval

This policy is adopted as an official policy of Grace Academy High School.

Approval Item	Representative
Approved by	GOVERNING BOARD / SCHOOL GOVERNING COUNCIL
Name of Chairperson	[NAME]
Signature	[SIGNATURE]
Date	[DATE]
Management Acknowledgment	Representative
Head of School / Executive Principal	[NAME]
Signature	[SIGNATURE]
Date	[DATE]