



Equality, Diversity & Inclusion Policy

Version:	2
New or Replacement:	Replacement
Approved by:	SLT
Date approved:	October 2023
Effective date:	October 2023
Author:	Deputy Principal Curriculum & Quality
Responsible Committee:	SLT
Corporation Committee (if applicable):	
Date of next review:	June 2025
Equality Impact Assessment Date:	
Lead responsibility:	Deputy Principal Curriculum & Quality
Policy Category:	Quality

1. Purpose

- 1.1. The College strives to create and maintain a working and learning environment in which everyone has the opportunity to participate fully, give of their best and achieve their full potential in a climate free from discrimination or harassment. We will treat all learners, staff and others associated with the college with fairness, respect and sensitivity.
- 1.2. It is the policy of the College to recognise and encourage the valuable and enriching contribution from all who work and learn here and the rights of all individuals who come into contact such as prospective learners and job applicants.
- 1.3. All staff, learners and visitors to our campuses have a right to equality of opportunity in accessing employment or services, irrespective of race, disability, gender, gender reassignment, age, nationality, sexual orientation, religion or belief, marital or civil partnership status, pregnancy or maternity status, or socio-economic status, background or class.
- 1.4. The College will actively challenge and tackle all forms of prejudice, discrimination and stereotypical attitudes. Any form of discrimination, harassment or victimisation carried out by an individual will be treated as a matter for possible disciplinary action.

2. Scope

- 2.1. This policy applies to all staff, learners and visitors including people using the services on our campuses such as the catering facilities, and those providing an onsite service such as contractors and sub-contractors. All of these groups of people will be expected to adhere to this policy. Where staff or learners are working or studying in locations other than our campuses they will still be subject to the policy. The policy also applies to external contractors, employers and other partners that we collaborate with.

3. Policy statement

- 3.1. Our Policy represents our commitment to ensuring that we place equality and diversity at the heart of what we do so that we develop a College in which all can benefit and no one is excluded. That all protected groups of learners and staff have a voice.
- 3.2. Promoting equality of opportunity for all individuals and promoting a good and harmonious learning and working environment in which all persons are treated with respect and dignity.
- 3.3. Preventing occurrences of unlawful, direct, indirect, associative and perceptive discrimination, harassment and victimisation whether it occurs, whether intentionally or unintentionally.
- 3.4. Fulfilling all our legal obligations under equality legislation, paying due regard to our equality duties. This includes everyone with a 'protected characteristic' which the Act defines as: race, disability, gender, age, sexual orientation, religion and belief, gender reassignment, pregnancy /maternity and marriage/civil partnerships.
- 3.5. Taking proportionate positive action to address inequalities faced by particular groups with particular characteristics. We aspire to do more than comply with the

present legislation for equal opportunities by making our policies and practice fully inclusive, eliminating discrimination, promoting equality and embracing diversity in all its aspects

- 3.6. The College recognises that good practice in relation to teaching, provision of support services and cross college activities and having high aspirations for our learners' results in their enjoyment of learning and their success.
- 3.7. In order to achieve our goals there will be ambitious targets, clear accountability for their achievement and rigorous monitoring and evaluation. Feedback from users of our services will be used to improve through new objectives. Learner views and our progress against our targets will be published.
- 3.8. Whilst we do not underestimate the challenges we are setting ourselves, we will not compromise in our expectations of all members of the College community to support our vision of a just and thriving economic society where everyone is valued and supported in fulfilling their personal potential

- 3.9. Our commitment to staff

We will:

- Strive to employ a diverse workforce which reflects the local community and the learner population
- Make clear our expectations and commitments to equality and diversity during the recruitment and selection process and again during induction
- Provide ongoing continuous professional development in equality and diversity, to equip staff to recognise and embed diversity and to challenge any form of discrimination
- Provide reasonable adjustments for staff who are or who become disabled
- Embed equality and diversity throughout workforce practice, for example providing good customer care embedding equality and diversity in teaching and learning and providing a high quality service for all.

- 3.10. Our commitment to learners

We will:

- Make clear our expectations and commitments to equality and diversity in our marketing and recruitment materials and events, during the learner and staff admissions processes and again during induction
- Celebrate equality and diversity for example via posters, tutorial activities and celebratory events
- Strive to provide an inclusive teaching and learning environment that is personalised to the individual and which takes account of individual need and cultural backgrounds
- Embed equality and diversity within all aspects of the learner journey from curriculum planning through to marketing our provision, recruiting learners, teaching and learning, assessment tutorial and enrichment activities.
- Strive to provide support services for learners that meet diverse needs, including additional learning support (ALS) tailored to individual needs for learners who require ALS to support their learning and progression
- Provide multiple learner voice opportunities for all learners to feed into the development of all aspects of the learner experience.

3.11. Our commitment to service users

We will

- Ensure our services are accessible
- Provide clear and meaningful information about our services

3.12. Tackling discrimination, harassment and victimization

We will

- Actively challenge and tackle all forms of prejudice, discrimination and stereotypical attitudes
- Deal with all allegations of discrimination, harassment and victimization sensitively and investigate fairly and thoroughly
- Treat any form of discrimination, harassment or victimisation carried out by an individual as a matter for possible disciplinary action

4. Definitions

4.1. The Equality Act 2010 introduces the term 'protected characteristic' to refer to aspects of a person's identity explicitly protected from unlawful discrimination. Nine are identified:

- Race
- Disability
- Gender
- Age
- Sexual orientation
- Religion and belief
- Gender reassignment
- Pregnancy/maternity
- Marriage/civil partnership.

4.2. In addition, other aspects of a person's identity, background or circumstance can cause them to experience discrimination, for example a person's socio-economic status, class or background. The college is committed to advancing equality and eliminating discrimination on these and other grounds.

4.3. The Equality Act 2010 identifies the following types of discrimination:

Direct discrimination, including associative and perception discrimination

- Indirect discrimination
- Harassment
- Victimisation
- Discrimination arising from a disability
- Failure to make reasonable adjustments

4.4. The Equality Act 2010 introduced a Public Sector Equality Duty which requires the college to give due regard to:

- eliminating discrimination, harassment and victimisation
- advancing equality of opportunity
- fostering good relations.

‘Advance’ involves having due regard, in particular, to the need to:

- Remove/minimise disadvantages experienced by persons who share a relevant protected characteristic that are connected to that characteristic
- Take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who don’t share it
- Encourage persons with a relevant protected characteristic to participate in public life or in any other activities where participation by such persons is disproportionately low

‘Foster good relations’ includes having due regard to tackling prejudice and promoting understanding

5. Roles and Responsibilities

- 5.1. All staff, learners and service users, including contractors and volunteers, are responsible for following and supporting this policy. Any person can raise, either informally or formally, complaints of unfair and/or discriminatory treatment. Breaches of this policy will be taken seriously and may lead to disciplinary proceedings.
- 5.2. The governing body will:
 - ensure that the college strategic plan has a commitment to equality, diversity & inclusion
 - receive and respond to staff and to learner monitoring reports
 - agree relevant equality targets and monitor progress towards these.
- 5.3. The management will:
 - take an active and visible lead in driving forward equality, diversity & inclusion
 - oversee implementation of this policy
 - ensure equality and diversity data is embedded within self-assessment reports and development plans
 - agree equality targets with relevant managers.
- 5.4. The equality, diversity & inclusion committee will:
 - review the policy annually
 - monitor its effectiveness and measure its impact
 - produce the Annual Equality, Diversity & Inclusion Report
 - oversee the implementation of any required developments.
- 5.5. All staff will:
 - attend regular training opportunities to ensure they understand the principles of this policy and the implications for their job role and responsibilities
 - implement the policy in the course of their duties.
- 5.6. All learners will:
 - treat everyone with respect and consideration, making them feel welcome
 - behave carefully, avoiding swearing, using inappropriate language or saying hurtful or disrespectful things about other people
 - report any concerns they have for themselves or others.

6. Monitoring performance

- 6.1. We will actively monitor our performance to ensure we are meeting our commitments. For example, we will gather and use the following information, disaggregated by equality, diversity & inclusion parameters, to monitor and improve practice

For employment:

- Staff profile
- Grievance records
- Disciplinary records
- Complaints
- Staff progression
- Access to and satisfaction with, staff development opportunities

For learners:

- Recruitment, retention, pass rate and achievement
- Attendance and punctuality
- Enrichment
- Progression
- Learner satisfaction
- Complaints
- Disciplinary records

- 6.2. Outcomes from analysis of the above information will help inform self-assessment processes and improvement plans. The Equality, Diversity & Inclusion committee will assess our progress in meeting our commitments and improving practice will be submitted reports to the governors together with equality improvement targets.
- 6.3. We will publish annually, on our website, an Equality, Diversity & Inclusion Annual Report that will summarise the outcomes from the above activities and highlight our progress and performance in equality and diversity
- 6.4. Where sensitive data is used, the college will always comply with the Data Protection Act (1998), General Data Protection Regulations (GDPR) and the Data Protection Policy.

7. Accountability

- 7.1. The Deputy Principal Curriculum & Quality is responsible for the drafting and implementation of this policy.
- 7.2. He or she is also responsible for ensuring that this document is regularly reviewed and updated – and is the first contact point for managers seeking advice and guidance about the Improving Equality, Diversity & Inclusion Policy or making enquiries about its interpretation.

- 7.3. All managers are responsible for ensuring that they and their team members follow the requirements set out in this document.
- 7.4. All employees are responsible for adhering to the requirements set out in this document.

8. Equality, Diversity & Inclusion

- 8.1. The College has paid due regard to equality considerations during the preparation and implementation of this Policy.
- 8.2. These considerations included the potential for any differential negative effect on the grounds of age, disability, gender reassignment, pregnancy and maternity, race (including ethnic or national origins, colour or nationality), religion or belief (including lack of belief), sex, sexual orientation, marriage or civil partnership.
- 8.3. The College's judgement is that there is no such negative effect on those grounds and, consequently, no potential breach of the Equality Act 2010.
- 8.4. The operation of this Policy and Procedure will be monitored by the Director of People and Organisational Development in order to establish that no unlawful discrimination is taking place and to identify opportunities for the College to enhance equality of opportunity and fair treatment.

9. Review

- 9.1. This document will be reviewed by June 2025
- 9.2. The Deputy Principal Curriculum & Quality will undertake this review, taking into account the outcomes of the monitoring process, legislative changes and developments in good practice.
- 9.3. As part of the review, the Deputy Principal Curriculum & Quality will seek and consider the views of the College's employees and, where appropriate, of the recognised trade unions.
- 9.4. The outcome of the review will be reported to the Senior Leadership Team.

10. Policy Category

<p>Category</p> <p>[select ONE only]</p>	<p><input type="checkbox"/> Business Development, Marketing and Subcontracting</p> <p><input checked="" type="checkbox"/> Corporation</p> <p><input type="checkbox"/> Data Protection</p> <p><input type="checkbox"/> Equality & Diversity</p> <p><input type="checkbox"/> Estates / Facilities</p> <p><input type="checkbox"/> Executive Support, Administration and Reception</p> <p><input type="checkbox"/> Finance</p> <p><input type="checkbox"/> Health and Safety</p> <p><input type="checkbox"/> International</p> <p><input type="checkbox"/> IT Services</p> <p><input type="checkbox"/> Management Information Systems</p> <p><input type="checkbox"/> People and Organisational Development</p> <p><input type="checkbox"/> Quality</p> <p><input type="checkbox"/> Student Services & Safeguarding</p>
<p>Audience</p> <p>[select ALL that apply]</p>	<p><input checked="" type="checkbox"/> Employees</p> <p><input checked="" type="checkbox"/> Governors</p> <p><input type="checkbox"/> Learners</p> <p><input checked="" type="checkbox"/> Partners</p> <p><input type="checkbox"/> Suppliers</p>

APPENDIX 1

Definitions of Discrimination

The Equality Act 2010 recognises the following types of discrimination:

- Direct discrimination, including associative and perception discrimination
- Indirect discrimination
- Harassment
- Victimisation
- Discrimination arising from a disability
- Failure to make reasonable adjustments

Direct discrimination occurs when someone is treated unfairly, or less favourably than another person, because they have a protected characteristic. This often arises because of assumptions, stereotyping or prejudice.

The Equality Act 2010 (the Act) extends the definition of direct discrimination to cover association discrimination. This is direct discrimination against someone because they associate with another person who has the protected characteristic. The Act also extends the definition of direct discrimination to cover perception discrimination. This is direct discrimination against someone because they are perceived to have a protected characteristic.

Indirect discrimination happens when a 'provision, criterion or practice' is applied that appears to affect everyone equally but which in fact puts people who share a protected characteristic at a disadvantage. The Act harmonises the definition of indirect discrimination across protected characteristics (with the exception of pregnancy/maternity). Although pregnancy and maternity are not covered by indirect discrimination, policy and practice that disadvantages pregnant women and new mothers could constitute indirect gender discrimination.

Harassment occurs when someone behaves in such a way that a person's dignity is violated, or behaves in such a way that they create an environment that is offensive, hostile, degrading, humiliating or intimidating for a person, where this is

- related to a protected characteristic (except pregnancy/maternity or marriage/civil partnerships), or
- of a sexual nature (sexual harassment), or
- where a person is treated less favourably because they have either submitted to or rejected sexual harassment, or harassment related to sex or to gender reassignment (this is known as 'consequential harassment')

The Act does not specifically cover harassment on the grounds of pregnancy/maternity or marriage/civil partnerships. However, direct discrimination prohibits treatment such as bullying or harassment which results in a person being treated less favourably.

The Act changes the definition of harassment from unwanted conduct 'on the grounds of to' unwanted conduct 'related to'. This subtle change has two benefits. Firstly, it will protect people who are offended by conduct even if it is not specifically directed at them. Secondly, the definition protects in relation to association or perception.

Victimisation happens when someone is treated unfairly or less favourably because they have supported someone in making a complaint or an allegation of discrimination, or because they personally have made an allegation of discrimination.

Failure to make reasonable adjustments happens when an organisation fails to make reasonable adjustments for a disabled person, to avoid the disabled person being placed at a substantial disadvantage when compared to a non-disabled person.

Direct discrimination (with the exception of age), harassment, victimisation and failure to make reasonable adjustments can never be justified. Indirect discrimination and discrimination arising from a disability may be permissible if an organisation can 'objectively justify' that their actions are a proportionate means of achieving a legitimate aim.