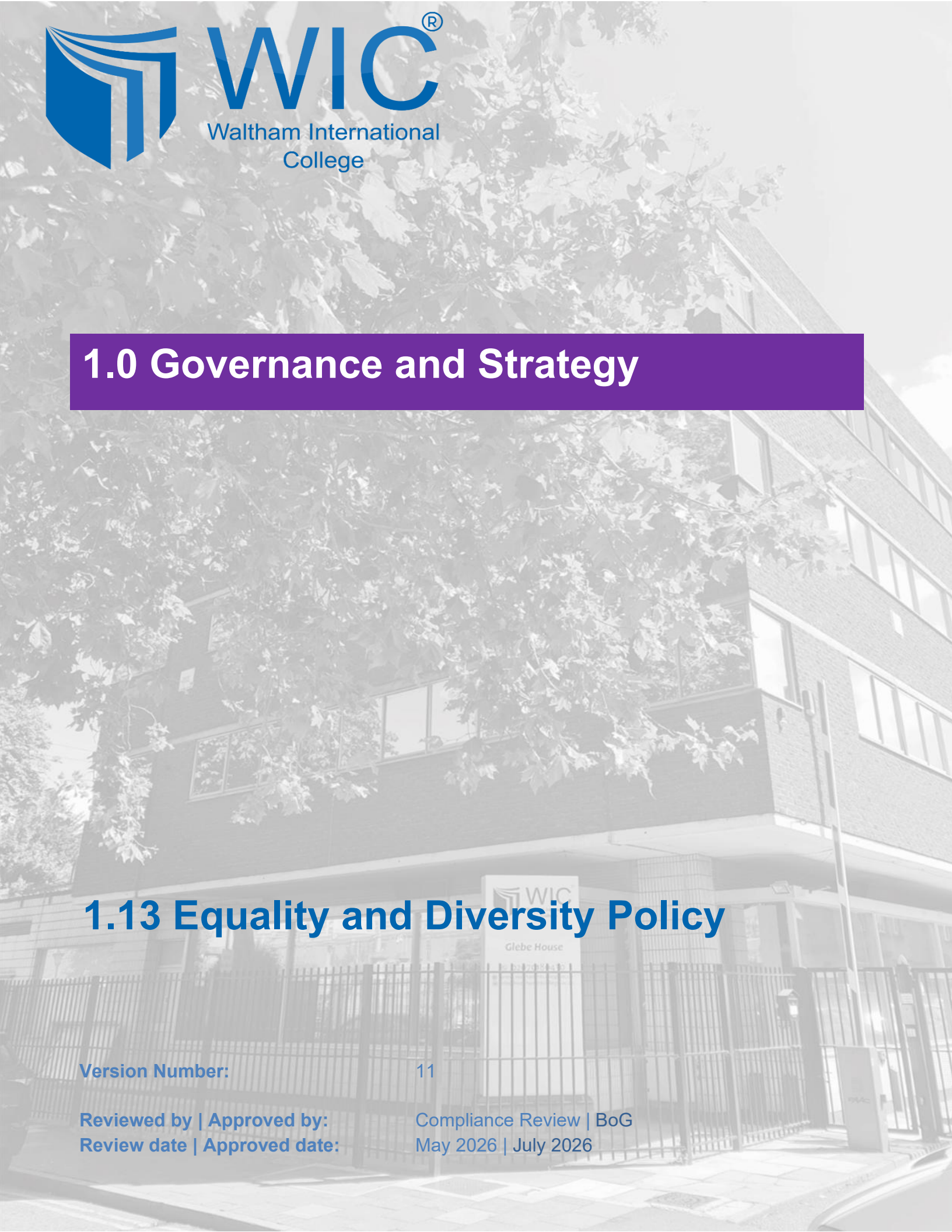
Waltham International College

1.0 Governance and Strategy



1.13 Equality and Diversity Policy

Version Number:	11
Reviewed by | Approved by:	Compliance Review | BoG
Review date | Approved date:	May 2026 | July 2026

Compliance Alignment Statement

This version of the Equality and Diversity Policy has been aligned to current UK and Office for Students requirements as of May 2026. The substantive changes are listed below.

Version Control Statement

Version	Date	Changes	Reason	Author	Next Review
1	30/09/15		New Policy	Principal	29/09/16
2	14/12/16	Possibility for the recruitment of ex-offenders is considered	To make recruitment an equal opportunity for all	Principal	13/12/17
3	14/12/17	Rewritten with more details.	Changes were made to make it more explicit and to increase the usage of the policy for the audience	Principal	13/12/18
4	05/07/18	Changed to incorporate GDPR	Changed to incorporate GDPR	Director of Curriculum and Quality	July 2019
5	28/07/19	Complete revision	Added Scope, responsibilities, Definitions and monitoring alongside a revision of current practice aligned to the new structure	Director of Studies HE	July 2020
6	July 2020	Changes of responsibilities for example registrar replaced by Student Support Manager Revised and corrected grammar, spelling and punctuations throughout the document	Annual Review	Head of HE	Jul/Aug 2021
7	July 2021	Minor adjustments and title corrections	Annual Review	Head of HE	August 2022
8	Aug 2022	General Review and Grammar check.	Annual Review	Vice Principal HE	Aug 2023
9	Aug 2023	No changes	Annual Review	Head of HE	Aug 2024
10	Aug 2024	General Review	Annual Review	Head of HE	August 2025
11	May 2026	Full regulatory rewrite Main changes: Update extended reference list Textual changes across the whole document to align with regulatory language	Compliance Alignment 2026 (OfS)	Regulatory Review	August 2027

External Reference Points

- Equality Act 2010 (including Schedule 19 — Public Sector Equality Duty)
- OfS Condition of Registration E1 — Freedom of Speech and Academic Freedom
- OfS Condition of Registration E2 — Harassment
- OfS Condition of Registration E3 — Prevent Duty
- OfS Condition of Registration B5 — Equality of Opportunity: Student Outcomes
- Higher Education and Research Act 2017
- Equality and Human Rights Commission (EHRC) Codes of Practice
- Office for Students Access and Participation Guidance
- ACAS Equality and Diversity Guidance

Related Policies and Documents

Affects all other policy documents. This document should however be read together with the following documents:

- 1.11 Safeguarding, Child Protection and Vulnerable Adults Policy
- 1.15 Access and Participation Plan
- 2.04 E-Safety Policy
- 3.01 Student Recruitment, Selection and Admission Policy
- 4.01 Resourcing Policy
- 4.10 Bullying, Harassment and Sexual Misconduct Policy
- 4.09 Non-Academic Misconduct Policy
- 4.13 Disability and Inclusion Policy

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1. Purpose

This policy sets out Waltham International College's commitment to equality, diversity, and inclusion across all areas of its activity. It establishes the College's legal obligations under the Equality Act 2010, including the Public Sector Equality Duty, and its regulatory obligations under the Office for Students (OfS) Conditions of Registration, in particular Conditions E1 (freedom of speech and academic freedom), E2 (harassment), E3 (Prevent duty), and B5 (equality of opportunity in student outcomes).

The policy defines the College's prohibited conduct, responsibilities, and commitments, and sets out the mechanisms for reporting, monitoring,

2. Scope

This policy applies to:

- All employees (permanent, fixed-term, and casual), agency workers, and contractors
- All students, applicants, and prospective students
- Governors and Board members
- Visitors to College premises

It covers all areas of College activity including: employment, teaching and learning, assessment, procurement, marketing, admissions, and the provision of services. This policy must be read alongside all associated policies listed above.

3. Introduction

Equality, diversity, and inclusion are central to the mission and culture of WIC. The College recognises that its staff and student community encompasses a wide range of protected characteristics, backgrounds, and experiences, and that an inclusive environment is essential to educational quality, staff wellbeing, and institutional integrity.

This policy reflects the College's active, evidence-based approach to equality management. Rather than treating equality as a compliance exercise, the College seeks to embed inclusive practice across teaching and learning, employment, governance, and the provision of services. Equality data is collected, monitored, and acted upon, and progress is reported publicly and to the Board of Governors.

This policy should be read alongside the related documents listed above, in particular the Disability and Inclusion Policy (4.13), the Bullying, Harassment and Sexual Misconduct Policy (4.10), and the Safeguarding, Child Protection and Vulnerable Adults Policy (1.11), which address specific aspects of the College's equality obligations in greater detail.

4. Legal and Regulatory Framework

4.1 Equality Act 2010 – Protected Characteristic

The College will not tolerate discrimination, harassment, or victimisation based on any of the nine protected characteristics under the Equality Act 2010:

- Age

- Disability (including physical, sensory, mental health, and learning difficulties)
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race (including colour, nationality, and ethnic or national origins)
- Religion or belief (including lack of belief)
- Sex
- Sexual orientation

4.2 Forms of Prohibited Conduct

The College prohibits the following forms of conduct:

- Direct discrimination — treating someone less favourably because of a protected characteristic
- Indirect discrimination — applying a provision, criterion, or practice that puts persons with a protected characteristic at a particular disadvantage
- Associative discrimination — treating someone less favourably because of their association with someone with a protected characteristic
- Perceptive discrimination — treating someone less favourably based on a perceived protected characteristic
- Harassment — unwanted conduct related to a protected characteristic that has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment
- Sexual harassment (including conduct of a sexual nature, requests for sexual favours, and gender-based harassment)
- Victimisation — treating someone less favourably because they have made or supported a complaint under the Equality Act
- Third-party harassment — allowing a student or employee to be harassed by someone external to the College

4.3 Public Sector Equality Duty (PSED)

As a higher education provider registered with OfS, WIC is subject to the Public Sector Equality Duty under section 149 of the Equality Act 2010. The College must, in carrying out its functions, have due regard to the need to:

- Eliminate unlawful discrimination, harassment, victimisation, and any other conduct prohibited under the Act
- Advance equality of opportunity between persons who share a protected characteristic and those who do not
- Foster good relations between persons who share a protected characteristic and those who do not

To discharge the specific duties under the PSED, the College will:

- Publish equality objectives at least every four years and make progress publicly available
- Collect and publish equality information annually, including staff and student equality data
- Assess and publish the impact of its policies and practices on groups with protected characteristics

4.4 OfS Conditions E1, E2 and E3

4.5 OfS Condition E1: Freedom of Speech and Academic Freedom

The College is committed to taking reasonably practicable steps to secure freedom of speech and academic freedom for all members of its community. A separate Freedom of Speech Policy sets out how the College meets this obligation.

4.6 OfS Condition E2: Harassment

The College takes a zero-tolerance approach to harassment in all its forms. A dedicated Bullying, Harassment and Sexual Misconduct Policy sets out the College's commitments, processes, and support mechanisms, in compliance with OfS Condition E2. The College will report to OfS on its harassment management activities as required.

4.7 OfS Condition E3: Prevent Duty

The College fulfils its statutory duties under the Counter-Terrorism and Security Act 2015 (Prevent Duty) and complies with the OfS Condition E3 requirements. This is addressed in detail in the College's Safeguarding, Child Protection and Vulnerable Adults Policy.

4.8 OfS Conditions B5 – Equality of Opportunity in Student Outcomes

The College monitors student outcomes across all protected characteristics in compliance with OfS Condition B5. This includes:

- Continuation, completion, and progression rates disaggregated by protected characteristics
- Assessment outcomes and grade profiles by protected group
- Access to placements and employability support
- Identifying and addressing unexplained gaps in outcomes between student groups

Where gaps in outcomes are identified, the College will develop and implement targeted action plans and report progress through its Access and Participation Plan, the Annual Monitoring Report, and the Academic Board.

5. Definitions

Term	Definition
Direct discrimination	Treating someone less favourably than another person because of a protected characteristic

Indirect discrimination	Applying a provision, criterion, or practice that puts persons with a protected characteristic at a particular disadvantage without objective justification
Harassment	Unwanted conduct related to a protected characteristic that violates dignity or creates an intimidating, hostile, degrading, humiliating, or offensive environment
Victimisation	Treating someone detrimentally because they have made or supported a complaint under the Equality Act 2010
Reasonable adjustment	A change made by an employer or education provider to remove or reduce a disadvantage related to a person's disability
Protected characteristic	One of the nine characteristics protected under the Equality Act 2010: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation
PSED	Public Sector Equality Duty under section 149 of the Equality Act 2010

6. Our Commitments

6.1 Marketing and Access to Learning

The College will ensure that all marketing materials, websites, and communications are inclusive and accessible, reflect the diversity of the communities it serves, do not reinforce stereotypes, and comply with relevant advertising standards. Entry requirements will be published clearly, and barriers to access will be minimised consistent with the College's Access and Participation Plan.

6.2 Recruitment and Continuous Development

The College will:

- Apply fair, transparent, and consistent recruitment and selection processes for both staff and students, free from bias
- Advertise all roles to the widest appropriate audience
- Ensure all staff involved in recruitment receive equality and diversity training
- Monitor applications and appointments by protected characteristics and take action where under-representation is identified
- Ensure equal pay and conditions for work of equal value
- Support staff continuous professional development with regard to equality and diversity

6.3 Inclusive Environment

The College will:

- Provide physical and digital environments that are accessible to all students and staff, including those with disabilities

- Make reasonable adjustments for disabled students and staff as required by the Equality Act 2010
- Develop facilities and courses to improve access and widen participation
- Celebrate diversity through events, communications, and curriculum content
- Ensure a zero-tolerance approach to bullying, harassment, and discrimination

6.4 Teaching, Learning and Assessment

The College will embed equality, diversity, and inclusion into the curriculum and ensure:

- Teaching and learning materials are inclusive, reflect diverse perspectives, and are free from bias
- Assessment methods are fair and accessible, with reasonable adjustments made where required
- Student outcomes are monitored by protected characteristic, and any unexplained gaps are investigated and addressed
- Students are supported to engage critically with issues of equality and diversity as part of their academic development

6.5 Support for Students

The College will:

- Offer support services that are accessible and responsive to the individual needs of all students
- Provide targeted support for students from groups with historically lower participation or attainment in HE
- Ensure students are aware of support available through induction and ongoing communication
- Refer students to specialist support where appropriate

7. Responsibilities

7.1 Board of Governors

- Approve this policy and ensure appropriate resources are committed to its implementation
- Receive annual equality and diversity reports and hold the College accountable for its PSED obligations
- Champion diversity at the most senior level of governance

7.2 Principal

- Ensure this policy is implemented effectively across the College
- Lead the College's commitment to equality and diversity and champion a culture of inclusion
- Ensure equality data is collected, published, and acted upon

7.3 Senior Management Team

- Implement this policy within their areas of responsibility
- Ensure all staff under their management receive appropriate equality and diversity training
- Monitor and report on equality data within their areas

- Respond to equality and diversity concerns promptly and appropriately

7.4 Human Resources

- Ensure equality legislation is applied to all HR processes
- Support managers in handling disciplinary matters related to equality
- Collect and analyse staff equality data and publish this as required by the PSED
- Maintain equality training records

7.5 Academic Board

- Monitor student outcome data disaggregated by protected characteristics
- Identify and respond to unexplained gaps in student outcomes
- Approve curriculum changes that affect access or inclusivity

7.6 All Staff

- Treat all students, colleagues, visitors, and contractors with dignity and respect
- Complete mandatory equality and diversity training as required
- Report any incidents of discrimination, harassment, or victimisation
- Not discriminate, harass, or victimise on the basis of any protected characteristic
- Support an inclusive teaching and learning environment

7.7 Students

- Treat fellow students, staff, and visitors with dignity and respect
- Report any experiences or observations of discrimination, harassment, or victimisation
- Comply with this policy and associated policies

8. Reporting and Complaints

8.1 Students

Students who experience or witness discrimination, harassment, or victimisation should report this through the College's Complaints Policy and Procedures. Students may also report to a relevant member of staff (e.g., their Programme Manager or Student Support). The College will ensure that all reports are handled sensitively, confidentially where possible, and without detriment to the reporter.

8.2 Staff

Staff who experience or witness discrimination, harassment, or victimisation should report this through the College's Disciplinary and Grievance Policy. Staff will not suffer any detriment for raising concerns in good faith. Line managers are expected to address concerns promptly.

8.3 External Escalation

Staff or students who remain dissatisfied after exhausting internal procedures may escalate their concerns to external bodies, including:

- The Office for Students (OfS)
- The Equality and Human Rights Commission (EHRC)
- The Office of the Independent Adjudicator for Higher Education (OIA) (students only)
- The Employment Tribunal (staff only)

9. Disciplinary Consequences

Breaches of this policy constitute serious misconduct. For staff, breaches will be investigated and addressed through the College's Disciplinary and Grievance Policy and may result in sanctions up to and including dismissal. For students, breaches will be addressed under the Non-Academic Misconduct Policy (4.09) and may result in sanctions up to and including exclusion from the College.

10. Monitoring, Reporting and Review

The College is committed to evidence-based equality management. Monitoring activities include:

- Annual collection and analysis of student equality data (enrolment, outcomes, complaints) disaggregated by protected characteristics
- Annual collection and analysis of staff equality data (recruitment, retention, pay, complaints)
- Publication of equality information in compliance with the PSED
- Regular review of equality objectives (at least every four years)
- Annual reporting to the Board of Governors on progress
- Regular review of this policy (annually) and full revision at least every three years or following significant legislative or regulatory change

Equality data and outcomes are reviewed by the Academic Board, Senior Management Team, and Operations Management Committee as part of the College's self-assessment process.

11. Appendices

11.1 Additional Resources

- Equality Act 2010: https://www.legislation.gov.uk/ukpga/2010/15
- OfS Conditions of Registration: https://www.officeforstudents.org.uk/advice-and-guidance/regulation/conditions-of-registration/
- EHRC Codes of Practice: https://www.equalityhumanrights.com
- OfS Access and Participation Guidance: https://www.officeforstudents.org.uk/advice-and-guidance/promoting-equal-opportunities/
- ICO (Data Protection): https://ico.org.uk