

# 1.0 Governance and Strategy

## 1.13. Equality and Diversity Policy

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|----------------|-----------------------|
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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<br><br>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 2024  | General review                                                                                                                                                                | Annual Review                                                                                                                   | Head of HE                         | August 2025  |
| 10      | Aug 2025  | General review                                                                                                                                                                | Annual Review                                                                                                                   | Principal                          | August 2026  |

**External Reference Points**

Equality Act 2010

**Related Policies and Documents**

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

- Bullying and Harassment Policy
- Recruitment Policies (Staff and Student)
- Safeguarding Policy
- E-safety Policy
- Non-Academic Misconduct policy
- E6 policy and procedures

## Contents

|                                                                            |           |
|----------------------------------------------------------------------------|-----------|
| <b>Introduction.....</b>                                                   | <b>4</b>  |
| <b>Scope.....</b>                                                          | <b>5</b>  |
| 1 - Eliminate unlawful discrimination, harassment, and victimisation:..... | 6         |
| 2 - Advance equality of opportunity:.....                                  | 6         |
| 3 - Foster good relations:.....                                            | 6         |
| <b>Our commitment.....</b>                                                 | <b>6</b>  |
| <i>Marketing and Access to Learning</i> .....                              | 6         |
| <i>Recruitment and Continuous Development</i> .....                        | 7         |
| <i>Inclusive environment</i> .....                                         | 7         |
| <i>Responsive Teaching Learning and Assessment</i> .....                   | 8         |
| <i>Open and Acceptable</i> .....                                           | 8         |
| <b>Responsibilities .....</b>                                              | <b>8</b>  |
| <i>Board of Governors</i> .....                                            | 8         |
| <i>Operations Management Committee</i> .....                               | 9         |
| <i>Academic Boards</i> .....                                               | 9         |
| <i>Human Resource Department</i> .....                                     | 9         |
| <i>Senior Management Team</i> .....                                        | 9         |
| <i>All members of staff and Students</i> .....                             | 9         |
| <b>Complaints .....</b>                                                    | <b>10</b> |
| <i>Staff</i> .....                                                         | 10        |
| <i>Students</i> .....                                                      | 10        |
| <b>Disciplinary Actions .....</b>                                          | <b>10</b> |
| <b>Monitoring .....</b>                                                    | <b>10</b> |
| <b>Definitions .....</b>                                                   | <b>11</b> |
| <b>Additional Resources.....</b>                                           | <b>12</b> |

## Introduction

Waltham International College (WIC) is committed to ensuring the provision of equal opportunities to all employees and students. We endeavour to create an environment where we respect all, learn from our differences, value diversity, and actively champion cohesiveness throughout the College.

We believe that all forms of prejudice and discrimination are unacceptable and will strive to tackle these and remove conditions that place specific people or groups of people at a disadvantage.

At WIC, we celebrate diversity, and we are committed to advancing equality of opportunity, regardless of age, disability, gender or gender identity, race, religion or belief, sexual orientation, social background and family responsibilities.

WIC aims to provide an environment where diversity is the norm, bullying, harassment, and discrimination are eradicated and people are prepared to live and work in a multi-ethnic, multi-faith, multilingual society

Especially WIC strives to:

- Encourage the participation of students of all abilities
- Provide a safe and welcoming environment for all
- Develop its facilities and courses to improve access and widen participation
- Offer support to meet individual student and employee needs
- Ensure its recruitment processes for both staff and students are fair and transparent
- Ensure that the College is an environment that is free from discrimination, bullying or harassment

This Policy operates within the context of the Equality Act 2010, which was introduced to streamline, simplify, and strengthen equality legislation through a single Act, and replaces previous legislation.

This policy needs to be read in conjunction with the Colleges:

- Bullying and Harassment Policy
- Recruitment Policies (Staff and Student)
- Safeguarding Policy
- E-safety Policy
- Non-Academic Misconduct policy
- E6 policies and procedures

## Scope

This is an overarching policy on equality and diversity that applies across all areas of the College, including employment, teaching, learning, procurement and marketing and admissions. This policy should not be read in isolation but cross-referenced with all associated policies, procedures, and practices, as listed above.

The College will operate within the legislative framework of the Equality Act 2010. This policy applies to all team members, temporary staff from employment agencies, contractors, visitors, employers, and students. The College views discrimination against any student or team member on any grounds as a serious disciplinary offence.

Breaches of this policy will be regarded as misconduct and will therefore be subject to the appropriate Disciplinary policies.

The College will not tolerate any forms of discrimination based upon:

- Direct discrimination
- Indirect discrimination
- Associative discrimination
- Perceptive discrimination
- Harassment
- Victimisation
- Third-party harassment

The College will not tolerate any form of discrimination, bullying or harassment on the grounds of any of the protected characteristics set out in the Equality Act 2010, these are:

- Age - older and younger people
- Disability – people with physical and sensory impairments, mental health difficulties, long-term medical conditions and learning difficulties
- Gender – men and women
- Gender reassignment – transsexual people, transgender people and men and women with a transsexual history
- Marriage and civil partnerships – married people, those in a civil partnership and single people
- Pregnancy and maternity – pregnant women, people on maternity leave and women who have recently given birth
- Race – nationality and ethnic background, origin, or heritage
- Religion and belief – people from different faith groups, people with a philosophical belief and people with no religion or belief
- Sexual orientation – gay men and lesbians, bisexual people, and straight people.

Under the Equality Act 2010, we have 3 public duties that we aim to meet as we work towards our mission

## **1 - Eliminate unlawful discrimination, harassment, and victimisation:**

The College operates a zero-tolerance policy to discrimination; we perceive this part of our duty to be a minimum standard that all employees, students, contractors, and visitors to the college will achieve. The college will ensure that procedures for challenging all forms of bullying, discrimination, harassment, and unacceptable behaviour are widely promoted, and actively challenged.

## **2 - Advance equality of opportunity:**

The College will work to ensure that every individual reaches their full potential regardless of their characteristics or socio-economic status. The college will make all reasonable adjustments to its provision, teaching and learning resources, access, and other publications to enable equal access for all individuals and groups.

## **3 - Foster good relations:**

The College will pro-actively promote equality and diversity. It will ensure our students and staff have an understanding and appreciation of the diversity and difference that goes to make up the society in which we live and work.

All staff and students of the college should recognise their responsibility and role to be played to make it an inclusive and equal opportunity provider.

# **Our commitment**

## **Marketing and Access to Learning**

- College publicity and student recruitment procedures will be designed to encourage applications from all sections of the community and from all levels of ability and will be available in a range of formats.
- The College will ensure that admission procedures are user friendly and avoid unnecessary barriers to access for intending students.
- The College will continue to identify and respond to learning needs within the community and will encourage widening participation from underrepresented, disadvantaged or excluded groups.
- Make clear our expectations and commitments to equality and diversity in our marketing materials and events, during the student admissions process and again during induction.
- Equal opportunities data will be collected, analysed, and used to inform the planning and decision-making process of our Recruitment, Admissions and Support policies.



## Recruitment and Continuous Development

- We establish and maintain partnerships that add value and promote inclusion.
- We provide impartial advice and guidance for all applicants, which consider any support needs and ensures placement on an appropriate course.
- We have staff and student recruitment policies that positively support equality and diversity, with panel members trained in equal opportunities recruitment practice.
- Applicants are not treated less favourably because of disability, age, gender (sex), race, religion or belief, pregnancy or maternity, marriage or civil partnership, gender reassignment and sexual orientation
- We ensure to provide an induction to all newly appointed staff within three months of commencing employment and to all students at the start of their programme.
- Individual training and development needs will be identified through the Appraisal process
- We develop in-housework placement and mentoring opportunities for our students and graduates.
- We work towards staff and students' profiles that reflect the diversity of the communities we serve.
- Ensure progression opportunities are available to all members
- We ensure that staff at all levels is suitably qualified, with sufficient experience and/or training to undertake their duties and have a valid DBS check.

## Inclusive environment

- We create a diverse and inclusive environment that values differences and in which all our students feel welcome and empowered to succeed.
- We promote equality and diversity in all College activities.
- We celebrate diversity through college events, activities and displays.
- We monitor participation based on race, gender, disability, and age group.
- We seek feedback from key stakeholders
- We ensure class allocation reflects diversity as far as practically possible
- We regularly hold events and student activities that celebrate diversity

## Responsive Teaching Learning and Assessment

- We provide teaching, learning and assessment methods, support and resources that meet the individual needs of our students.
- We offer a responsive curriculum that provides students with the knowledge and skills they need to be competitive in life.
- That curriculum delivery is underpinned by access to additional learning support where required, including literacy, numeracy, and ICT.
- We provide staff development and training to meet the needs of underrepresented groups and individuals.
- We are committed to the development of learning environments that are welcoming and safe for all students.
- We will continue to develop our facilities and infrastructure to improve access for students with learning difficulties and or disabilities

## Open and Acceptable

- We involve and include people in decisions that affect them
- everyone is challenged to improve their understanding of those around them and become more accepting
- We encourage all to open their minds to new ideas and different ways of working.
- We ensure that all staff attends regular equality and diversity training, as relevant to their job.
- We promote good relations between individuals and groups and ensure that bullying, harassment, and discrimination are not tolerated under any circumstances.
- We challenge inappropriate language and behaviour.
- We report and monitor all incidents of bullying, harassment, and discrimination.

## Responsibilities

This policy applies to all team members, including agency staff, students, employers, work placement providers, visitors, and contractors working on campus and sub-contractors.

### Board of Governors

It is the responsibility of the Board of Governors to ensure that the College meets its legislative responsibilities in respect of equality and diversity and for receiving and responding to monitoring information.



## Operations Management Committee

The Operations Management Committee is responsible for ensuring that team members and students are familiar with their roles and responsibilities and the content of this policy. It is committed to providing support, equality, and diversity training to promote a positive and inclusive culture for learning and for work.

The Operations Management Committee is responsible for monitoring the profile of the student and team member profiles by age, gender, race, and disability.

## Academic Boards

The Academic Board will strategically lead all aspects of equality and diversity. They are responsible for the promotion of equal opportunities for students concerning curriculum planning, materials and resources, assessment, role models, teaching and learning methods, the management of the environment, and social and economic aspects of learning.

Meetings will incorporate Equality and Diversity as agenda items where appropriate to ensure that we:

- meet the needs and interests of our team members and students.
- monitor performance and champion excellence,
- implement improvements,
- identify and where required effectively narrow any achievement gaps and
- monitor how effective we are at promoting equality, and diversity and tackling discrimination.

## Human Resource Department

It is responsible for ensuring that the recruitment and selection policy does not discriminate in any way and that job advertisements are fully inclusive. This will include advertising through recognised minor groups' publications. The College will ensure that recruitment and selection procedures are open, consistently applied, and free from bias, stereotyping and discrimination. Additionally, the College will endeavour to ensure that reasonable adjustments are made to arrangements and premises to ensure both current and potential team members with a disability have equality of access.

## Senior Management Team

The Principal will lead the Senior Management to provide direct leadership and support in all areas to ensure an environment of equality, diversity, and inclusion, and that meets the needs and interests of students and team members. They will support, monitor performance, champion excellence, and support the implementation of improvements, to "promote diversity and social mobility".

## All members of staff and Students

All team members and students are responsible for ensuring the implementation of this policy, and for their own conduct. All team members should challenge discriminatory behaviour by students, placement providers, outside contractors, and other team members. All team members and students must avoid unfair discriminatory practices.

WIC is committed to the general health and well-being of its students and team members and encourages them to develop positive relationships, respect others and celebrate diversity. Bullying, discrimination, or any other form of discriminatory behaviour will not be tolerated. Safeguarding procedures are in place to ensure that students have a safe and secure environment.

The College will seek to provide a supportive environment for those who make claims of discrimination or harassment according to the policies listed in this document.

## Complaints

### Staff

Staff complaints relating to equality and diversity will be referred to the Heads of Departments and resolved/escalated in line with the college's Complaints policy.

For example, the Head will meet with the subject of the complaint and the complainant (privately or together, depending on the seriousness of the allegations). Where the matter cannot be resolved amicably, or the matter is serious, a formal investigation through the staff complaint's procedure will take place and disciplinary action could ensue where allegations are proven.

### Students

Complaints relating to equality and diversity against students will be referred to through the Complaints process. A Student's Programme Manager may initially investigate, with escalation to the Quality team or Principal where appropriate and required in line with the college's Complaints policy

The Programme Manager, will meet with the subject of the complaint and the complainant (privately or together, depending on the seriousness of the allegations). Where the matter cannot be resolved amicably, or the matter is serious, the college's complaints procedure for formal complaints will be initiated with a written complaint and a formal investigation.

All student complaints relating to harassment and bullying will be dealt with using the Bullying and Harassment Policy and Procedures.

## Disciplinary Actions

Disciplinary Action will follow the guidance set out in the disciplinary policies for both staff and students.

## Monitoring

The Equality and Diversity Policy is subject to regular review. The policy and the implementation arrangements that underpin it will be formally reviewed on an annual basis. This review will consider the views of team members, students, and relevant legislation.

The College monitors the profile of its students and team members by age, gender, gender reassignment, disability, religion, sexual orientation, marital status, pregnancy, race, and ethnicity. Monitoring for students is undertaken by the Student Support Manager and, for team members, by the HR officer. Data collected for monitoring purposes will be reported at least annually to the Board of Governors. The presentation of such information shall observe the College's legal and contractual responsibilities in respect of individual confidentiality, particularly regarding sensitive data and will not unnecessarily identify individuals.

Monitoring at the course level is integrated into the programme review process.

Student enrolment, retention, and achievement, student survey and complaints are annually monitored by ethnic group, gender, age, and disability. The findings are used to inform the Annual Reviews. Students' views are identified using satisfaction surveys, student representatives and in Student-Staff Liaison meetings.

Complaints made to the College on grounds associated with equality and diversity are actioned and analysed to establish any trends.

The following systems are in place to monitor and evaluate the equality and diversity impact of the College policies.

- Annual Monitoring Review.
- Student survey and focus groups.
- Equality analysis.
- Annual report to the Board of Governors

## Definitions

- **Protected characteristics** are the grounds upon which discrimination is unlawful. Direct Discrimination occurs when someone is treated less favourably than another person because of a protected characteristic they have.
- **Associative Discrimination** already applies to race, religion or belief and sexual orientation. This is now extended to cover age, disability, gender reassignment and sex. It occurs when you treat people less favourably because they are associated with someone who has a protected characteristic (other than pregnancy and maternity).
- **Perceptive Discrimination** already applies to age, race, religion or belief and sexual orientation. This is now extended to cover disability, gender reassignment and sex. It means direct discrimination occurs against an individual because others think they have a protected characteristic. It applies even if the person does not possess that characteristic.
- **Indirect Discrimination** already applies to age, race, religion or belief, sex, sexual orientation and marriage and civil partnership. This is now extended to cover disability and gender reassignment. Indirect discrimination can occur when the College has a condition, criteria rule, or policy that applies to everyone but particularly disadvantages people who share a protected characteristic. It does not matter if it was unintentional, it matters if your action disadvantages a person compared with a person who does not share that characteristic.

- **Harassment** is unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual. Harassment applies to all protected characteristics except for pregnancy, maternity, marriage, and civil partnership. Team members will be able to complain of behaviour they find offensive – even if it is not directed at them. Team members do not need to possess the relevant characteristic themselves and are protected from harassment because of perception and association.
- **Third Party Harassment** occurs already applies to sex and is now extended to cover age, disability, gender reassignment, race, religion or belief and sexual orientation. The Equality Act makes the College potentially liable for harassment of team members and students by people (third parties) such as clients or customers and contractors of the employer/provider.

For an employer to be liable:

- the harassment must have occurred on at least two previous occasions (although not necessarily by the same harasser or suffering the same type of harassment).
- it must be aware that the previous harassment has taken place, and
- it must have failed to take reasonable steps to prevent harassment from happening again.
- **Victimisation** occurs when a team member is treated badly because they have made or supported a complaint or raised a grievance under the Equality Act, or because they are suspected of doing so. If you treat a person less favourable, because of this then this will be classed as unlawful victimisation.

A 'protected act' is:

- making a claim or complaint of discrimination (under the Equality Act).
- Helping someone else to claim by giving evidence or information.
- Alleging that you or someone else has breached the Act.
- Doing anything else in connection with the Act.

(Source: The Equality and Human Rights Commission (EHRC) 2012)

Failure to make reasonable adjustments happens when the College 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.

## Additional Resources

Further useful sources of information are listed below:

- [www.ucu.org.uk](http://www.ucu.org.uk)
- [www.equalityhumanrights.com](http://www.equalityhumanrights.com)
- [www.equalities.gov.uk](http://www.equalities.gov.uk)
- [www.acas.org.uk](http://www.acas.org.uk)