

Equality, Diversity and Inclusion (EDI) Policy

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1. Purpose

The purpose of this EDI policy is to ensure that no individual student or member of staff at the college is disadvantaged by the following factors: race, religion and belief, gender, gender reassignment, sexual orientation, age, additional caring responsibilities, pregnancy and maternity, marriage (including civil partnerships), socio-economic background or disability.

This policy describes:

- The college's vision and commitment to equality, diversity and inclusion (EDI)
- Legal Duties under the requirements of The Equality Act 2010 in employment, facilities, goods and services and admission and treatment of students.
- The general equality duty to eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010, advance equality of opportunity between people from different groups; and foster good relations between people from different groups.
- Practical steps for implementation of the policy.

2. Scope

Employees and students working or studying at, and visitors to, the college are required to support and uphold the EDI Policy and Procedure, as are employers who work with apprentices and/or provide industry placements to students. Furthermore, the college will only work with partners and key stakeholders that support and uphold the EDI Policy and Procedure.

The college's Board of Corporation - governors - are also required to support and uphold the EDI Policy and Procedure, ensuring that the college remains inclusive in its character and is free from discrimination, harassment and/or victimisation such that all individuals have equal opportunities to work, learn and, ultimately, reach their full potential.

Governors require the college to:

- ensure that relevant EDI policies are in place, up to date and effectively implemented
- promote equality of opportunity and inclusion and celebrate diversity
- not discriminate on the grounds of any protected characteristic, in any aspect of its work
- make reasonable adjustments for disabled people
- listen to student and stakeholder voices and make improvements to support equality of opportunity, diversity and inclusion

3. Responsibility

The college will publish Equality Objectives each year, as required by the specific duties of the Public Sector Equality Duty and will also publish information to demonstrate compliance with the specific duties of the Public Sector Equality Duty.

Responsibility for the monitoring of staff compliance lies with the Director of Human Resources (HR). The Director of HR will publish information on: recruitment and promotion, pay and remuneration, training, appraisals, disciplinary actions, dismissals and other reasons for leaving.

Responsibility for the monitoring of student compliance lies with the Assistant Principal for Quality and MIS.

The Assistant Principal for Quality and MIS will also coordinate the authoring (with others) and publication of the college's annual EDI report which will include information regarding:

- Leadership and management of EDI
- Student, staff and governor EDI profiles
- Progress towards EDI Objectives 2023-24
- EDI achievement data
- Other key achievements
- Refreshed EDI Objectives for the next year (2024-25)

EDI is everybody's responsibility. However, operational responsibility for the implementation of the EDI Policy, Procedures and guidelines is led by the Director of Student Support and Inclusion and is implemented by the college's management team. Overall responsibility for the implementation of the EDI Policy lies with the Principal and CEO.

4. Our Vision: EDI Statement

The college is committed to fostering an environment free from all forms of discrimination, actively promoting inclusion, equality of opportunity and celebrating diversity. Under no circumstances will the college condone an act of unlawful discrimination.

The college will ensure that its Equality Objectives are reviewed and refreshed, where necessary, on an annual basis and will engage staff, students and key stakeholders in their development and achievement, such that the college exceeds statutory responsibilities.

5. Procedure

The Equality Act came into force in 2010 covering specific equality strands or protected characteristics: age, disability, gender, gender identity, race, religion or belief, and sexual orientation, pregnancy and maternity, marriage (including civil partnerships).

The single public sector Equality Duty (April 2011) requires public authorities to eliminate discrimination, harassment and victimisation by:

- Advancing equality of opportunity.

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- Fostering good relationships between people with different characteristics
- Employment: The college will not discriminate directly or indirectly in recruitment or employment between people with different characteristics specified in the Equality Act 2010.
- Equal Pay: The college has a structured pay system and conducts pay audits following the Equal Pay Code. Any equalities in pay will be tackled through equal pay action plans.
- Reasonable adjustments are provided for staff, students and other college stakeholders who may be experiencing barriers due to disability, including alternative formats for other relevant protected characteristics.
- The recruitment, retention and achievement of students are monitored by protected characteristics to determine trends, gaps in achievement etc. and enable the college to provide focused support where it may be needed.
- The Admissions Policy for the college supports equal access and equality of opportunity for all, providing suitable support for students to access all services and facilities at the college's campuses or online.
- For children and young people whose circumstances have made them vulnerable to underachievement, the college provides support to enhance their participation and improve their achievement.
- All forms of oppressive behavior / bullying / harassment are challenged by staff and students at all times in accordance with the college's Anti-Bullying Policy and Dignity at Work Policy. Training will be available to staff to support them in this activity.
- A contemplation room will be available for multi-faith worship.
- Student induction and tutorial programmes have been developed to support the college approach to EDI and British Values/
- A range of activities will be used to identify student perceptions of the college environment and the quality of their experience, including; surveys, focus groups, course rep and Student Council meetings.

6. The Quality of Provision

Effective Teaching, Training and Learning

- Admissions processes and initial assessment prior to courses beginning are used to personalise support for students, including those with additional support needs.
- Curriculum intent and implementation reflect and promote EDI in context. Curriculum teams design learning experiences in order to expose students to

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different ideas, perspectives and information and provide them with the opportunity to see a successful future for themselves. Lessons and workshops are personalised to make sure that students see themselves represented in the curriculum and the resources used.

- Support is made available for English for Speakers of Other Languages (ESOL) students who need it to secure their achievement.
- Educational technology is used to help our students to reach their full potential, to give them the chance to engage in a number of different ways and to identify tools that help them understand and be understood.
- Educational technologies will be utilized to give our students improved choice and power over their own learning and to enable them to remove barriers for themselves e.g. what they need to do their best work, where and how to work, how to display, present or share their learning.
- All students who require assistive technology resources are access support appropriate to their needs e.g. Read & Write Gold, MOTE, Speechify
- Every opportunity is given throughout each academic year for students to disclose any disabilities such that students feel able and confident to disclose and to see disclosure as the right course of action. The college provides reasonable adjustments in response to such disclosures and will never disadvantage students on the basis of such needs.
- Opportunities to celebrate diversity and to share experiences and knowledge are offered through curriculum enhancement and cross-college enrichment. The college supports student-led development of students' networks e.g. Lesbian Gay Bisexual Transgender Questioning (LGBTQ+) group and Student Disability Forum and will ensure that best practice from these groups are shared.

7. Student Guidance and Support

- Information, advice and guidance will be delivered in ways accessible to different groups with protected characteristics and in ways that challenge stereotypes and equip students to defend their rights to fair treatment.
- Support services will meet the needs of students from diverse backgrounds and communities.

8. Consultation and Participation

The college will consult staff, students and other stakeholders through the annual cycle of planning to ensure the its EDI Policy and Procedures reflect best practice, are 'lived' and the college's Equality Objectives are achieved.

9. Training and Development

In conjunction with this policy, EDI training is offered to staff and college stakeholders to support the Equality Objectives, raise knowledge of equality legislation, develop equality and diversity competencies and tackle discriminatory practice and behaviour. Attendance at training events will be monitored by the college.

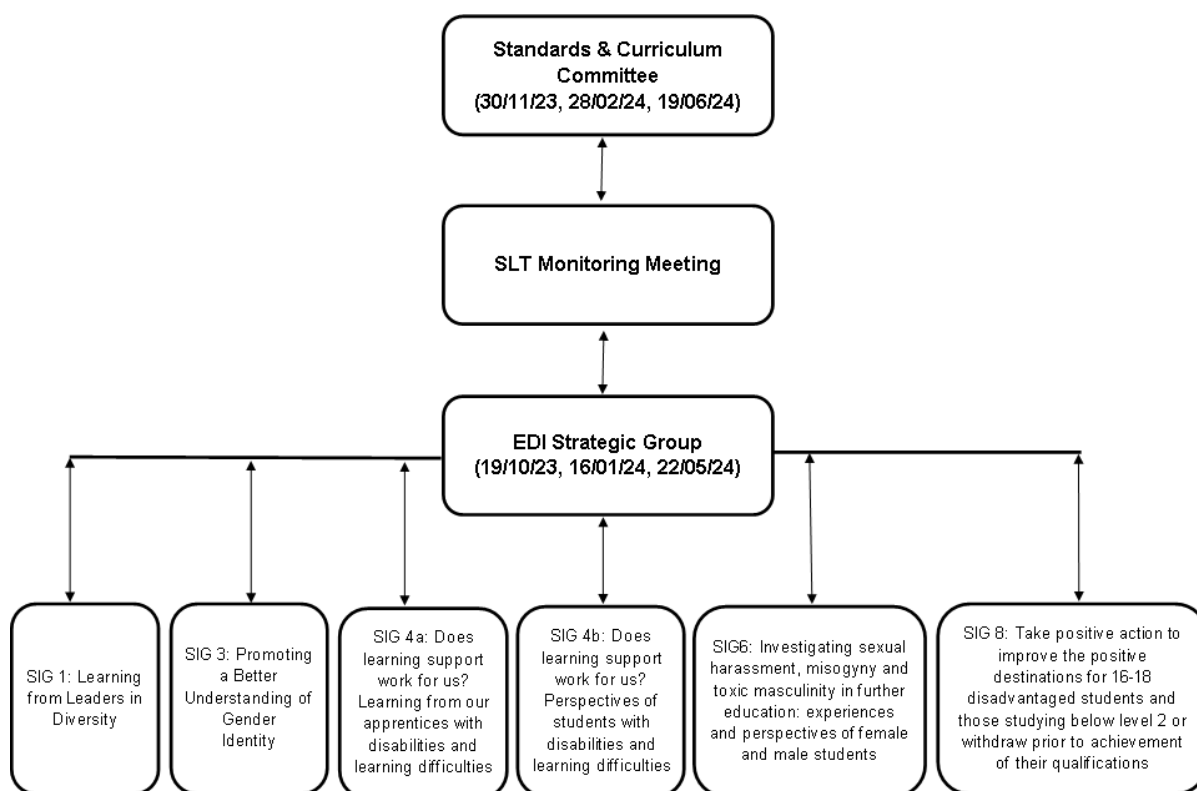
10. Complaints

The college has a number of ways in which staff and students may raise concerns in relation to any breach of this Policy, e.g. the Compliments and Complaints Policy, the Anti-Bullying and Harassment Policy, the Staff Grievance Procedure. The Staff Disciplinary Procedure and the Student Disciplinary and Positive Behaviour Management Procedure will be followed where necessary.

11. Monitoring

The effectiveness of this Policy will be monitored through the college's EDI Strategy group, progress against the college's Equality Objectives and the college's annual EDI Report. Monitoring reports are submitted to the college's Senior Leadership Team (SLT) Monitoring meeting and Board of Corporation meetings.

The college has a number of Special Interest Groups (SIGs), convened to achieve the Equality Objectives. The SIGs operationalise actions to achieve the Equality Objectives and may, variously: undertake, and investigate / discuss the outcomes of, research, take positive action and share best practice. A member of the college's SLT will oversee the progress of each SIGs, liaising with SIG leads and reporting progress back to the EDI Strategy Group.



12. Other Legal Duties

In putting this Policy into practice, the college will work to meet all other duties introduced under the following laws and regulations and is ready to implement future legislation in this area:

- The Equality Act 2010.
- Rehabilitation of Offenders Act 1974
- The Protection from Harassment Act 1997
- Human Rights Act 1998



13. Equality Objectives

Equality Objectives for Warrington & Vale Royal College 2023-2025

- 1) Focus on **whole college approaches to EDI**.
 - Undertake a review of the college's approach to EDI, using credible external consultancy.
 - Develop an EDI action plan based on the outcomes of the review of EDI at the college.
 - Restructure the college's EDI group to encompass an over-arching strategic group (to oversee the development and progress of the EDI plan) and a series of project-focused task and finish groups.
 - Approach colleges that hold the Leaders in Diversity Award, from whom the college can learn and improve EDI practice.
- 2) Focus on **disclosure of protected characteristics (staff)**.
 - Increase disclosure amongst staff of protected characteristics including, for example, sexual orientation and ethnicity.
- 3) Focus on **gender identity (students)**.
 - Review the methods by which the college collects information on students' gender identity.
 - Work with a specialist partner and college students to create CPD and tutorial resources (for staff and students) to raise awareness of gender identity, promoting a better understanding of the same.
 - Investigate the usefulness of the 'Rainbow Flag Award'.
- 4) Focus on **disabilities and learning difficulties (students)**.
 - Review the methods by which the college collects and categorises adults' declarations of disabilities and/or learning difficulties.
 - Investigate further the achievement gaps - caused by poor retention – in apprenticeships.
 - Undertake a review of additional learning support for students with SEN.
 - Take positive action to close the achievement gap for students with disabilities and/or learning difficulties.
- 5) Focus on **disabilities and learning difficulties (students)**.
 - Form a steering group from which to review the curriculum for students with SEN.
 - Identify, where appropriate, pathways for students with more complex disabilities and/or learning difficulties - currently in specialist educational institutions - into mainstream Further Education at the college.
 - Eliminate the gap evident in post-16 provision for students with more complex disabilities and/or learning difficulties.
- 6) Focus on **gender (students)**.
 - Undertake research into sexual harassment and assault in female college students.
 - Work with a specialist partner and college students to take positive action in response to the findings of the research.
 - Continue to take positive action - pastorally and within curriculum areas - that challenge misogyny and toxic masculinity in all its forms.
- 7) Focus on **gender (staff)**.
 - Take positive action to reduce the gender pay gap.
 - Recruit and retain female staff into quartile 3 - circa £40K - roles, for example, teaching roles.
 - Recruit and retain male staff into quartile 2 - circa £20-30K - roles, for example, support roles.

- 8) Focus on **positive destinations (16-18 disadvantaged students)**.
- For those studying below level 2 or withdrawn prior to achievement of their qualifications

14. Types of Discrimination

Direct Discrimination

This occurs when someone is treated less favourably than another person because of a protected characteristic.

Associative Discrimination

This is direct discrimination against someone because they associate with another person who possesses a protected characteristic (for example, a mother of a disabled child).

Perceptive Discrimination

This is direct discrimination against an individual because others think they possess a particular protected characteristic. It applies even if the person does not actually possess that characteristic.

Indirect Discrimination

Indirect discrimination can occur when employers and learning providers have a condition, rule, policy or a practice in the company that applies to everyone but which particularly disadvantages people who share a protected characteristic. Indirect discrimination can be justified if employers and learning providers can show they acted reasonably in managing their business.

Harassment

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”. Staff and students will now be able to complain of behaviour that they find offensive even if it is not directed at them, and the complainant need not possess the relevant characteristic themselves. Staff and students are also protected from harassment because of perception and association.

Third Party Harassment

The Equality Act makes employers and learning providers potentially liable for harassment of their staff or students by people (third parties) who are not employees of the company, such as customers, subcontractors or guest speakers. Employers and learning providers will only be liable when harassment has occurred on at least two previous occasions and they were aware that it has taken place but did not take reasonable steps to prevent it from happening again.

Victimisation

Occurs when a member of staff or a student 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. A member of staff or student is not protected from victimisation if they have maliciously made or supported an untrue complaint or raised a grievance under the Equality Act; or because they are suspected of doing so. There is no longer a need to compare treatment of a complainant with that of a person who has not made or supported a complaint under the Act.

Discrimination arising from disability

- Treating disabled people unfavourably when using their services for a reason connected with disability.
- Where a provision, criterion or practice puts disabled people at a substantial disadvantage compared with those who are not disabled, to take reasonable steps to avoid that disadvantage.
- Where a physical feature puts disabled people at a substantial disadvantage compared with people who are not disabled to avoid that disadvantage or adopt a reasonable alternative method of providing the service or exercising the function.
- Where not providing an auxiliary aid puts disabled people at a substantial disadvantage compared with people who are not disabled, to provide that auxiliary aid.

15. Failure to make reasonable adjustments

The duty to make reasonable adjustments comprises three requirements for service providers and those exercising public functions, these requirements are:

- Where a provision, criterion or practice puts disabled people at a substantial disadvantage compared with those who are not disabled, to take reasonable steps to avoid that disadvantage.
- Where a physical feature puts disabled people at a substantial disadvantage compared with people who are not disabled to avoid that disadvantage or adopt a reasonable alternative method of providing the service or exercising the function.
- Where not providing an auxiliary aid puts disabled people at a substantial disadvantage compared with people who are not disabled, to provide that auxiliary aid.



Equality Impact Assessment

Policy Title:	Equality and Diversity Policy
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Identify the Key Stakeholders:	Staff and students	
What is the impact on the following:	Key Characteristics	Impact
	Age	(1) A positive impact is intended and very likely
	Disability	(1) A positive impact is intended and very likely
	Sex	(1) A positive impact is intended and very likely
	Racial group	(1) A positive impact is intended and very likely
	Religion and belief	(1) A positive impact is intended and very likely
	Sexual orientation	(1) A positive impact is intended and very likely
	Gender re-assignment	(1) A positive impact is intended and very likely
	Pregnancy and maternity	(1) A positive impact is intended and very likely
	Marriage and civil partnership	(1) A positive impact is intended and very likely

Have any additional safeguarding risks been identified?	Please tick		
	Yes	<input type="checkbox"/>	No



Actions to be addressed:

Action	To be completed by	Target Date	Completed (Y/N)

Validated by the Equality & Diversity Committee

Date:

**If applicable, actions completed and validated by the
Equality & Diversity Committee**

Date: