Equity, Diversity & Inclusion Policy and Procedure

Contents

1. Scope and Purpose

Context

Wiltshire College and University Centre ((WCUC) also referred to as the College)) is working towards the creation of a supportive and inclusive working and learning environment which is free from discrimination, where there is mutual respect, equality of opportunity, equity in support of aspiration and where difference is celebrated and respected.

This Equity, Diversity & Inclusion Policy is set within the context of the WCUC Strategic Plan, which articulates our mission, vision, and values, including a cross cutting theme of equity, diversity and inclusion. Equality objectives will be set and published at regular intervals and addressed by a comprehensive EDI action plan which also implements the aims of this policy.

Purpose

The EDI Policy sets out the requirements and responsibilities of the college for ensuring and advancing, equality for all members of the college community in accordance with the Equality Act 2010 and the Public Sector Equality Duty 2011.

The policy promotes positive attitudes to equity, inclusivity, and diversity to create an environment where all are able to participate and fulfil their potential. It seeks to ensure that no person is treated less favourably or unfavourably on the grounds of any of the protected characteristics (Appendix 1).

All members of the college community have a responsibility to uphold this policy, give equity of opportunity to all and eliminate discrimination, harassment, and victimisation.

Scope

This policy applies to all members and potential members of the college community, including but not limited to:

    a. Staff
    b. Students
    c. Governors
    d. Applicants for jobs
    e. Applicants for courses
    f. Contractors and agency workers
    g. Employers
    h. Work placement providers
    i. Visitors
    j. Volunteers

All these groups of people will be expected to adhere to this policy. Where staff or students are working or studying in locations other than our campuses, they will still be subject to the policy.

Behaviour outside working time and outside our campuses may also fall within the scope of the policy. Breaches of this policy will be taken seriously and may lead to disciplinary action.

The Equity, Diversity and Inclusion Policy is fully supported by senior leaders and has been approved by the Governing Body of the College.

2. Key Responsibilities

A number of key groups and individuals have as key role in the development and implementation of this policy.

2.1 The Governing Body is responsible for ensuring that:

- They are aware of and take ownership of the College's responsibilities as outlined in this policy and equality legislation.

- They review college equality and diversity information and consider this with regards to setting targets for the College.

- They consider the diversity of the Governing Body and how this compares to the student population.

- Before any major strategic decisions are made, the Governing Body considers equality issues.

- The College meets its legal obligations in relation to the Equality Act 2010.

2.2 The Senior Leadership Team (SLT) is responsible for ensuring that:

- The College meets its legal obligations in relation to equality.

- The College's Strategic Plan encompasses our commitment to equity of opportunity and promotes diversity and inclusion.

- They champion the EDI policy and associated actions ensuring the quality improvement plan has equity and equality at its core.

- They lead on ensuring the College has an inclusive culture and leaders role model inclusive behaviours.

- The College recruits and retains an inclusive and diverse workforce, which is appropriately developed to ensure individuals have the opportunity to achieve their full potential.

- Equality Impact Assessments are undertaken where required.

2.3 The College Management Group (CMG) is responsible for ensuring that:

- They support the EDI agenda of the College and actively promote EDI within their departments and teams, encouraging staff to get involved in EDI initiatives.

- They promote this policy amongst their staff and ensure their staff have a clear understanding of the college's approach to EDI, identifying staff development as necessary.

- Bullying, harassment, and discrimination are effectively tackled and the College demonstrates a zero tolerance culture to bullying, harassment and discrimination.

- EDI is embedded in all activities.

- They effectively lead by example in treating all staff and students with dignity and respect and by being fair and reasonable in their attitudes and behaviours.

- They treat staff as individuals and provide support where necessary to ensure all staff feel included, making reasonable adjustments if needed.

- They ensure their continuing professional development includes EDI topics

- They set themselves and their teams EDI objectives and review these in 1-1's and PDR discussions.

- All programmes of learning offered, will be regularly reviewed through the Self-Assessment Report (SAR) and curriculum planning processes. They will examine how far they meet the needs of all students with particular reference to equality of opportunity.

- They take appropriate action where necessary to assist minority or under-represented groups to increase participation, retention and achievement tailored to any patterns within curriculum areas (e.g., gender bias).

- They actively recognise their unconscious biases and take action to mitigate these when making key decisions.

- Teaching observation reports include an evaluation of how successfully equity and diversity is embedded and advanced.

- Schemes of work, lesson content and teaching resources of staff within their areas are reviewed against the commitments within this policy and take action to make improvements or adjustments accordingly.

- Professional Service areas analyse their service and resources against the commitments within this policy and take action to make improvements or adjustments accordingly, accounting for equality in their SAR.

- All college students, staff and stakeholders are made aware of the College's EDI Policy and Procedure, through the Student Handbook, student, staff and governor induction programmes and visitor arrangements.

2.4 The EDI Group is responsible for:

- Supporting the implementation of the EDI policy across the college.

- Setting and monitoring the EDI Action Plan.

- Evaluating EDI data on staff and students in relation to engagement, recruitment, achievement, and satisfaction.

- Facilitating internal EDI groups to develop specific aspects of EDI work.

- Supporting WCUC to create an inclusive and diverse environment.

- Supporting the college to fulfil its statutory duties and public duty including annual equality information and reports.

- Providing advice, guidance, and support on the application of this policy to all stakeholders.

- Linking with appropriate equality bodies.

- Commissioning relevant training & development.

2.5 Everyone has a responsibility to give full and active support for the EDI policy by ensuring:

- The policy is understood and implemented.

- Their behaviour always takes into account the uniqueness of others.

- Everyone is treated with respect, courtesy and dignity.

- Behaviour not in accordance with the EDI Policy is challenged and acted upon, we are all active bystanders.

3. Process/ Procedure

3.1 Audit

3.1.1 The College will:

- Undertake an audit in relation to policies and procedures, practice of policy and perception of policy and process.
- Seek student and staff opinions and consider this in review of the policy.

3.2 Policy Development

3.2.1. The College will:

- Benchmark existing policy statements from other Colleges and advisory groups;
- Develop human resources and other policies (outlining vision, scope, responsibility, accountability and measurements); and
- Cascade new policies with SMT endorsement through staff briefings.

3.2.2. Equality impact assessments are conducted for major decisions and changes and to ensure that all policies have been written and maintained so that their outcomes are fair and non-discriminatory.

3.3 Training and Education

- The College will:
- Consult key stakeholders and players on the learning requirements.
- Ensure that students undertaking learning on employer's premises are empowered and supported to challenge practices and behaviours in the workplace which they feel contravene College policy in relation to EDI.
- Evaluate training and secure budget for training design and delivery.
- Integrate diversity into mainstream training and development programmes including workplace Apprenticeships.
- Establish education programmes for all staff (including programmes that move from awareness to behavioural change).
- Integrate diversity competencies into development programmes and assessment and selection processes.
- Review third party EDI policies as required.
- All organisations who are being subcontracted by the College to deliver learning, are required to provide copies of their Equal Opportunities and Inclusion Policy Statements as part of the procurement process and annually as part of due diligence. This will enable monitoring of outcomes against the standards set out in the contract. Other contractors are expected to comply with the Colleges Equality Diversity and Inclusion Policy when engaged on college business.

3.3.1. Access to the Curriculum and the College**:**

- Integrate diversity competencies into development programmes and assessment and selection processes.

- Course programmes, syllabuses and resources are regularly examined to ensure they do not discriminate, directly or indirectly, against any group.

- Applicants to the college will not be discriminated against on the basis of any protected characteristics or association with them. The College has an important role in promoting participation in education and training for minority groups, therefore, applications from people from minority groups will be welcomed and wherever possible, reasonable adjustments made to ensure the College can meet their need.

- Syllabuses and resources include positive acknowledgement of the contributions made to society by a diversity of cultures.

- Courses are available to as wide a range of students as possible by enhanced flexibility in both delivery and timing.

- After due process of assessment of need, Learning Support is made available to students as appropriate.

- Ways of modifying curriculum delivery to allow access to classes for individuals with learning difficulties and/or disabilities continue to be sought.

- Assistive technologies will continue to be developed and deployed to assist and enhance the participation of students with disabilities and impairments in their use of learning opportunities.

- Procedures for accreditation and assessment will, wherever practicable, be flexible and responsive to the needs of the whole range of students who attend the College.

- The College supports the entitlement, for the whole college community, to information, guidance and wellbeing, which will enable individuals to manage their personal development.

- By adapting and modifying the environment and facilities, the College will strive to make all groups feel welcome.

- Offensive material of a discriminatory nature will not be displayed in any part of the College.

- Wherever possible, a facility at each of the main college centres will be made available to meet religious needs.

- The College will comply with the requirements of all current legislation pertaining to the access rights of people with mobility problems to ensure reasonable adjustments are made.

3.4   Communication and Consultation

The College will:

- Increase staff and student awareness of EDI through a range of media, meetings, workshops, PSD sessions and activities. EDI will play a key feature in course reviews, self-assessment, and departmental outcomes.

- Ensure that communication imagery and graphics are inclusive, and reflect and reinforce the words within the documentation;

- Distribute a top-level communications plan to senior management for team briefings, and develop "reporting back" communication lines to ensure feedback; and,

- Ensure that mainstream communications reinforce the inclusive messages and become mainstreamed into day-to-day processes.

3.5   Students

3.5.1. Students are responsible for ensuring that:

- They attend induction, enrichment, and personal and social development activities to expand their knowledge of equity, diversity and inclusion.

- Their coursework reflects sensitivity to issues of equality and diversity and does not include any discriminatory content.

- They do not use any college equipment or resources to produce or research material in such a way that could be considered discriminatory or in opposition to the commitments within this policy.

- They refer cases of inappropriate behaviour by any staff, visitors, or fellow students to a member of staff, act as good role models to peers and challenge inappropriate behaviour where they are confident in so doing.

- They contribute to a safe and inclusive environment that celebrates diversity.

3.5.2 The Comments, Complements and Complaints Procedure is available for all students to report any concerns. The complaints will be documented, and the complainant will receive a response in accordance with the Comments, Complements and Complaints Procedure. Any complaints relating to equality and diversity are monitored separately and referred to the equality and diversity group for consideration.

3.6 Staff

3.6.1. Staff are responsible for ensuring that:

- They refer cases of inappropriate behaviour by any staff, visitors, or fellow students to a member to a Senior Manager or Human Resources, act as good role models to peers and challenge inappropriate behaviour where they are confident in so doing.

- They are aware of this policy and their duties in relation to all the protected characteristics and the College's Public Sector Duties under the Equality Act.

- They demonstrate sensitivity to issues of diversity and that they attend and complete staff training to help their understanding of the issues in this area.

- Whatever their role, they challenge, within their ability, inappropriate behaviour of any person wherever it might occur within the College or during its activities.

- Visitors and contractors are made aware of and comply with the policy.

- They conduct themselves throughout their employment in a way that positively supports this policy and protects the College's reputation.

- Allow students the opportunity to comment on equality and diversity issues.

3.6.2. All employees are responsible for the promotion and advancement of this policy. Behaviour, actions, or words that transgress the policy will not be tolerated and will be dealt with in line with the College's Disciplinary Policy and Procedure.

3.6.3. Discussions relating to fair and inclusive practices will form an integral part of performance development reviews throughout the year.

3.6.4. All staff will be required to attend development opportunities to ensure that they are aware of and adhere to the College's Equality, Diversity and Inclusion Policy and Procedure.

3.6.5. The College will pursue non-discriminatory practices relating, pay and conditions.

3.6.6. All staff will have access to induction, regular performance development reviews, training and development reviews and appropriate staff development in equality and diversity, to equip staff to recognise and embed diversity and to challenge any form of discrimination.

3.6.7. Any employee may use the grievance procedure to raise issues about discriminatory conduct. If the matter relates to harassment based on disability, then the grievance may be raised in line with the Dignity at Work Policy or directly with the ~~Head~~ Director of Human Resources. The College wishes to ensure that staff feel able to raise such grievances and no individual will be penalised for raising such a grievance unless it is untrue and made in bad faith.

3.6.8. Any employee who harasses any other employee on the grounds of any of the protected will be subject to the Discipline Policy and Procedure. In serious cases, such behaviour will be deemed to constitute gross misconduct and as such could result in dismissal.

3.6.9. Recruitment

3.6.9.1. Recruitment advertisements will indicate the College is an equal opportunity employer and will include the Disability Confident Scheme.

3.6.9.2. Neither recruitment advertisements nor post details will include conditions or requirements, which have an adverse impact in relation to the protected characteristics. Interview applicants will not be asked questions, which may be considered discriminatory.

3.6.9.3. Job applicants' 'Equality of Opportunity' monitoring information will be kept separate from application forms and will remain anonymous. The interview panel will not be provided with this information.

3.6.9.4. All staff will be asked to complete a form denoting their protected characteristics. In addition, staff will be invited to disclose sexual orientation and their Religion and Belief. This information will be used for monitoring the effectiveness of policy, including the promotion of race equality, and, as above, will remain anonymous.

3.6.9.5. Shortlisting of applicants is carried out 'blind' in that the recruiting manager has no names or personal information for the applicant and selection will be made against specified criteria. Those shortlisting and interviewing will indicate reasons for decisions against such specified criteria.

3.7 Resources

The College will:

- Establish formal reporting lines for monitoring progress against targets and objectives;

- Select and establish an EDI working group with representatives from across all parts of the organisation;

- Secure financial sign-off from the appropriate individual(s) to enable related activities to be undertaken (for example reasonable adjustments to comply with the Equality Act 2010, and communication and training programmes).

3.8 Impact Measures

3.8.1. A set of Equality Objectives will be agreed, and an action plan devised and monitored to ensure that these are achieved.

3.8.2. This policy will be fully implemented when:

- All members of the college community actively and effectively promote equality, diversity, and inclusion as a result of effective training and development.

- Data is monitored and leads to relevant actions with participation and achievement gaps narrowing.

- Colleague engagement surveys and student views indicate a positive EDI culture.

- The college is recognised externally for its commitment to EDI.

3.9 External Profile

3.9.1. The image the College projects of itself in its promotional material, advertising, and public relations activity, sends messages about the College's approach to equality, diversity, and inclusion

3.9.2. College publicity will be regularly reviewed to ensure that:

- It is non-discriminatory to any group or individual.

- Individuals with a range of needs provide it in hard copy and electronic forms to ensure that information is widely available and accessible.

- It gives a positive image of a place, which welcomes all for education and training.

- Where groups might be under-represented applications from members of disadvantaged/ underrepresented groups are actively encouraged.

- Every effort will be made to ensure that appropriate publicity reaches all groups in the community, enabling the widest possible recruitment.

3.9.3. All College users and potential College users should be made aware of:

- study support.

- support for childcare.

- the services available within the College to support Students with learning difficulties and/or disabilities.

- the College counselling and guidance services; v) the availability of careers guidance.

- financial support.

- the admissions process.

4. Implementation

The Governing Body carries the ultimate responsibility, under the law, for ensuring that the College meets the requirements of equality legislation. The authority for this is delegated to the Principal & CEO who in turn has designated the Vice Principal Curriculum and Student Services to take the strategic lead for championing equity, diversity and inclusion. This role is shared with the Director of Human Resources concerning the College as an employer. However, all staff have the responsibility to uphold the policy, comply with the law and support the College in fulfilling its duties and commitments.

5. Associated Documents

Equality Act 2010
Special Educational Needs and Disability Act 2001
Protection from Harassment Act 1997
Employment Rights Act 1996
Employment Relations Act 1999

Safeguarding Policy and Procedure
Admissions Policy
Information, Advice & Guidance Policy
Quality Manual (curriculum)
Staff Recruitment Policy
Staff Code of Conduct
Staff Disciplinary Policy and Procedure
Staff Grievance Policy and Procedure
Dignity at Work Policy
Fitness to Study/Reside Procedure
Student Code of Conduct
Positive Behaviour Policy
College Complaints Procedure

6. Equality Impact Assessment

Wiltshire College and University Centre strives to ensure equality of opportunity for all students, local people and the workforce. As an employer and a provider of education, the College aims to ensure that none are placed at a disadvantage as a result of its policies and procedures. It is intended that this policy is fair to all. Where any part could potentially lead to unequal outcomes, the policy then justifies why this is a proportionate means of achieving a legitimate aim.

7. Data Retention Statement

Wiltshire College & University Centre is committed to ensure the data it collects, and holds is in line with the ICO's guidance and meets data protection law. Where appropriate a Data Protection Impact Assessment will be undertaken as and when policies are updated to ensure risks to the individual and college are considered and managed.

For further information please refer to Wiltshire College & University Centre's Data Protection Policy.

8. Policy Review and Ownership

This document is owned and managed by the Chair of the Equality, Diversity and Inclusion Group. The policy will be reviewed and amended as required, and at least bi-annually by Chair of the Equality, Diversity and Inclusion Group or appropriate substitute.

9. Amendments Log

Version	Date of Issue	Amendment summary	Author(s)
V1.0	23/01/2019	Approved by SMT	
V1.1	26/05//2021	Full review undertaken and approved by SMT.	Denise Lloyd
V3.1	15/11/22	Approved by SLT	Jo Grenfell

APPENDIX 1

Equality Act 2010 – Protected Characteristics

The Equality Act 2010 applies to the college as both an employer and education provider. The Act
identifies nine 'protected characteristics'

Age
The Act protects people of all ages (under-18s are only protected against age discrimination in relation to work, not in the 'provision of goods and services') however, different treatment because of age is not unlawful discrimination if an organisation can justify it as a "proportionate means of achieving a legitimate aim".

Disability
Under the Act a person has a disability if they have a physical or mental impairment which has a substantial and long-term adverse effect on a person's ability to carry out normal day to day activities. HIV, cancer, and MS are included from the point of diagnosis.

Sex
Both men and women are protected under the Act.

Gender Reassignment
The Act provides protection for transsexual people. A transsexual person is someone who proposes to, starts, or has completed a process to change his or her gender. The Act no longer requires a person to be under medical supervision to be protected, so a woman who decides to live as a man but does not undergo any medical procedures would be covered.

Marriage & Civil Partnership
The Act protects employees who are married or in a civil partnership. Single people are not protected.

Pregnancy & Maternity
A woman is protected against discrimination on the grounds of pregnancy and maternity during the
period of her pregnancy and up to 26 weeks after she has given birth.

Race
For the purposes of the Act, race includes colour, ethnic origin, national origin and nationality (including citizenship).

Religion or Belief
In the Act, religion includes any religion, and it includes a lack of religion. A religion must have a clear
structure and belief system. Belief means any religious or philosophical belief (e.g. humanism) or a lack of such belief. To be protected a belief must satisfy various criteria, including that it is a weighty and substantial aspect of human life and behaviour.

Sexual Orientation
The Act protects bisexual, heterosexual / straight, gay, and lesbian people.