

# Equality and Diversity Policy

<b>Policy review area</b>	Equality and Diversity
<b>Lead manager</b>	Principal
<b>Approval level</b>	Board
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## Introduction

Greater Brighton Metropolitan College (GB MET) is committed to providing equal opportunities for all staff and students and eliminating discrimination. In addition, we are committed to taking positive action to identify and eliminate inequality and promote inclusiveness in all aspects of College life.

This policy applies to all members of the College community. This community includes:

- All prospective and existing students including apprentices and those working off site.
- Permanent and temporary staff, as well as those employed by third parties. Our policy also applies to members of our Board of Governors, people applying for employment at the College and volunteers.
- All visitors to the College, including parents/carers, suppliers of goods and services and hirers of our premises.
- Partner organisations such as the employers of work based students and those hosting work experience students.

All members of the college community are expected to work together to create an environment where everyone feels safe, respected and listened to, regardless of their backgrounds.

We value diversity and recognise that people with different backgrounds, skills, attitudes and experiences enhance our College community. We strive to ensure that these differences are celebrated.

We recognise that some groups in our society experience discrimination. We are, therefore, committed to challenging all forms of discrimination and ensuring that the promotion of equality and diversity underpins everything we do. We will seek to redress all forms of disadvantage.

We will safeguard the interests of all the protected equality characteristics as outlined in the Equality Act 2010: disability, sex including gender reassignment, sexual orientation and gender identity, age, race, religion/belief, pregnancy/maternity, marriage and civil partnership. We will eliminate unlawful discrimination, harassment or victimisation on the grounds of the protected characteristics, as well as unfair discrimination by perception or association.

We recognise that discrimination may occur for other characteristics, such as socio-economic status, which are not explicitly protected by the Equality Act 2010. We will challenge inequality for all members of our College community.

We will promote good practice in equality and diversity, and will ensure that all members of our College community including the external organisations and employers we work with operate within the context of this policy.

## Purpose of the Policy

The purpose of this policy is to establish clear College guidance regarding equality and diversity and to establish key principles, structures and monitoring arrangements for the College. The College recognises its legal obligations under the following legislation:

- The Equality Act 2010
- Employment Rights Act 1996
- Human Rights Act 1998
- Apprenticeships, Skills, Children and Learning Act 2009
- Special Educational Needs and Disability Act 2001
- SEND Code of Practice 2014
- Gender Reassignment Act 2004
- Children and Families Act 2014

## **Policy Objectives**

- To eliminate unfair discrimination
- To advance equality of opportunity
- To foster good relations for all including those with protected equality characteristics
- To promote and facilitate student success and narrow any gaps in student achievement
- To provide a safe, welcoming and inclusive environment for everyone within our College community
- To encourage the development and sharing of good practice in the promotion of equality and diversity

## **Governance**

The Principal is the nominated lead for equality & diversity. The Equality & Diversity Committee is chaired by the Principal and comprises key college managers, staff, student's union representatives and Student Representatives.

This committee meets on a termly basis to ensure the College continues to fulfil its legal duties under the Equality Act 2010 as well as to monitor the College's progress towards its Equality Action Plan.

## **Equality & Diversity Principles**

### **We will:**

- Ensure that the achievement of equality and diversity is the collective responsibility of every member of our College community.
- Create a positive, inclusive ethos with a shared commitment to respecting diversity and difference
- Collect, analyse and report on a range of data that will identify areas of inequality, and develop appropriate strategies and actions that will address those inequalities.

## **Students**

- Develop a curriculum offer that meets the needs of the whole community and supports under-represented groups.
- Have high expectations and high aspirations for students
- Encourage all students to have high expectations and high aspirations for their future progression.
- Value the achievements of all students and support them to realise their full potential.
- Make reasonable adjustments to ensure that students are supported to fully participate and achieve their potential.
- Ensure that equality, diversity and inclusion are fully embedded within College planning processes (including trips, visiting speakers and work experience)
- Promote positive images of students to celebrate success from all backgrounds.
- Encourage applications from potential students into non-traditional areas of study to address areas of underrepresentation.

## Equality Principles within Employment

The College aims to employ a workforce which reflects, at every level, the community that it serves.

In seeking to achieve a balanced workforce at all levels, the College will ensure that no employee, job applicant or candidate for promotion will be disadvantaged or treated less favourably because of conditions or requirements that are not related to the job.

Reasonable adjustments will be made to arrangements and premises to ensure equal access for employees or potential employees with disabilities. The College is an accredited Disability Confident Employer and is committed to the following:

- To interview all applicants with disabilities who meet the minimum criteria for a job vacancy
- To ensure that there are mechanisms in place for regular discussions with employees with disabilities to discuss what can be done to make sure they can develop and use their abilities
- To make every effort when employees become disabled to make sure they stay in employment
- To take action to ensure that all employees develop the appropriate level of disability awareness needed to make these commitments work
- To annually review the College's commitment and what has been achieved, plan ways to improve on them and let employees and Jobcentre Plus know about progress and future plans

## Policy

**Legal Compliance:** The College will provide all information about its policy to learners, staff, governors, partner organisations/employers and volunteers. All members of the College community will be expected to conduct themselves in accordance with this policy.

**Promotion:** The College will promote equality of opportunity, positive attitudes and good relations between all members of the College community. All staff and students are responsible for the promotion of equality.

**Impact Assessment:** Our Equalities Impact Assessments monitor the impact of College policies or strategic decisions on race, gender, disability and age and will be extended to all protected characteristics. The College has a public duty to assess the effect of the equality policy on staff and learners from different groups. It will do this by setting and monitoring equality and diversity targets as set out in the College Quality Improvement Plan. Each curriculum area is required to comment on equality and diversity issues within its area in the annual Self-Assessment Report.

**Staff:** All teaching staff are required to highlight equality and diversity positively in their delivery. Evidence of the promotion of equality and diversity in teaching and learning is also assessed during lesson observations.

**Balancing Rights and Responsibilities:** All members should exercise their right to freedom of expression in a way that is compatible with the rights and beliefs of others. The College will take necessary steps to balance the rights of individuals with divergent views that seem to be in conflict with common views, as sensitively as possible.

**Positive Action:** The College takes positive action to narrow gaps in achievement and address under-representation of groups in the provision of employment, education and training. It monitors data on race, gender, age, and disability among the staff and students. There is an action plan to re-address any gaps revealed in its monitoring which is reviewed regularly by the Senior Leadership Team and the Equality and Diversity Committee.

**Inclusion:** Discrete courses are provided within the Inclusion department for learners with SEND and/or at risk of becoming NEET. A range of qualifications are offered for students aged 14-25 with additional learning and pastoral support as needed, with a view to students progressing into mainstream classes or into work.

**Teaching and Learning:** The College will ensure that its teaching and learning strategy actively promotes equality of opportunity and meets the needs of individual students by ensuring effective and appropriate learning support is in place and teaching and assessment methods, approaches and materials are varied and relevant.

**Assessments and Examinations:** The College will comply with the Single Equality Act in fully supporting assessments and examinations for disabled candidates, including accessible information on their qualifications, initial assessment of support needs and correct application of awarding body standards for assessment and examinations.

**Complaints:** The DCOO oversees the formal complaints procedure. All formal complaints will be logged and investigated thoroughly in line with College procedure.

**Discriminating Behaviour:** All members of the College community, including all students, staff and subcontractors have a duty to report any act of discriminating behaviour, harassment and victimisation relating to protected characteristics.

**External Organisations:** The College will actively promote equal opportunity with its partners, employers and work experience providers. The Apprenticeship Team requires Employers, partners and subcontractors confirm they have their own Equality and Diversity policy or will work within the College policy.

**Staff Development:** The College is responsible for providing mandatory training on Equality and Diversity for all employees. This includes initial training mandatory training at induction and refresher training in response to legislative changes such as meeting the needs of students with Special Educational Needs and Disabilities and Safeguarding and the Government's Counter Terrorism Strategy (PREVENT). Further eLearning sessions are available at different levels to promote awareness such as Diversity in the Workplace, Managing Equality and Diversity for Senior Managers, A Manager's Introduction to Discrimination, Embracing Diversity and Being Aware of your Unconscious Bias. Training is designed to enable all staff to carry out their role in promoting equality, fostering good relations between different groups and eliminating discrimination. For teaching staff, this is further supported by the Equality & Diversity teaching resources within the TLA Toolkit to ensure equality & diversity is firmly embedded within teaching practice.

**Contribution to Community Cohesion:** We are committed to building strong relationships with community groups and local organisations, contributing to community cohesion.

**Monitoring and Review:** The College assesses the success of policy and procedure through a variety of means. Equality Impact Assessment is a process of systematically checking policies and practices for any adverse impact that they may have on staff, students or the wider community.

**Recruitment Practices:** Process and guidance relating to student admissions and staff recruitment will be regularly reviewed via the Equality & Diversity Committee to ensure they comply with Equality and Diversity related legislation and the College's Equality & Diversity Policy. The College's Admissions process supports non-discriminatory access. Every effort is made to ensure equality of opportunity for all students and will provide suitable support in order for all students to access all services and facilities at the College.

**Disclosures:** Every opportunity will be given throughout each academic year for students and staff to disclose any disabilities, learning difficulties or other needs relating to protected characteristics that they

may have. The College will promote an environment in which people feel confident to disclose. The College will also provide reasonable adjustments in response to disclosure and will not disadvantage a student or member of staff on the basis of such needs.

**Quality Improvement Process:** Each year as part of the self-assessment process, the College sets itself a College Improvement Plan (CIP) which will have clear actions to narrow achievement gaps between different student categories. In addition, there is an annual HR report which analyses staffing, including recruitment from an Equality and Diversity perspective and plans to address any areas of concern. These are shared with the Senior Leadership Team and the governors who will monitor progress against actions.

**Feedback:** A range of activities such as student and staff surveys, student engagement and enhancement activities and staff focus groups will be used to identify staff and student perceptions of the College environment and the quality of their experience.

## **The Division of Responsibilities**

### **The Board of Governors:**

The Board of Governors are responsible for discharging their statutory duty in relation to equality legislation as an employer and service provider. Governors will strive to ensure that the Governing body reflects the diversity of the communities that the college serves and will ensure that the College Executive actively promotes Equality and Diversity and adequately addresses any identified areas of concern.

### **The Senior Leadership Team:**

The Senior Leadership provides direction, guidance and support on equality issues. The Principal and Senior Leadership Team are responsible for ensuring that the action plan is reviewed regularly.

### **Staff:**

All staff have responsibilities for promoting equality and fostering good relations between people of different ethnic, gender, age, disability and any other protected characteristics (See Appendix 1). The staff are responsible for putting policies into practice and challenging inappropriate behaviour from either learners, work placement providers or other members of staff. The College will also strive to ensure that the staffing body reflects the diversity of the communities that the College serves.

### **Students**

As key stakeholders in the College, learners have a responsibility to comply with all College policies, treating fellow learners, staff and visitors with respect and dignity. Learners are made aware of the College policies at induction, during tutorial discussions and through various methods including posters and messages.

### **Equality and Diversity Committee:**

Chaired by the Principal and includes staff and student representation. It monitors equality and diversity performance including monitoring and analysing data on student enrolment and success by gender, race, age and disability in line with Ofsted inspection. It also monitors staff recruitment, retention and promotion in terms of age, race, gender and disability.

### **College Recognised Unions:**

As the recognised unions in the College, UCU, Unison, and NEU have key roles to play in promoting, representing and monitoring equality issues. As democratic and member-led organisations they have a well-established history and practice of promoting equality from a grassroots perspective, both nationally and within the institution. At a college level, the unions also work closely with the Senior Leadership Team on equality issues by advising, negotiating and representing their membership through both formal and informal channels, including regular Joint Consultative Group meetings and representation on the Equality and Diversity Committee.

## **Equalities Information.**

In line with the Public Sector Equalities Duty we will review and publish our equalities information on an annual basis. This information will demonstrate how we meet our obligations under the Equality Act 2010.

## **Equality Objectives**

In line with the Public Sector duty we will publish our Equality Objectives on the College website. These objectives will be regularly reviewed via our Equality and Diversity Committee

## **Reporting on the Policy**

The Equality and Diversity Policy, once approved by the Corporate Governing Body, will be published on the staff and student intranet and reviewed every three years. The Public Sector Equality Duty Statement will be reviewed annually. Both documents will be displayed on the College website and easily accessed as part of the local offer.

- The policy will be reviewed through the Board of Governors.
- The Equality and Diversity Action Plan and progress against targets will be reviewed by the Equality and Diversity Committee
- Minutes of the Equality and Diversity Committee are available on the Intranet

## **Equality and diversity related incidents and complaints.**

The College will monitor equality and diversity incidents and complaints, and all staff will take responsibility for challenging and recording discriminatory behaviour, harassment and victimisation relating to protected equality characteristics. The College's Anti Bullying procedure, Safeguarding Policy and Complaints processes will enable those who believe they have been victims discrimination and harassment to raise concerns and achieve redress without undue delay or difficulty.

Any member of the College community who becomes aware of discriminatory behaviour, harassment or victimisation has a duty to report this:

- Acts perpetrated by students should be reported to their Head of Curriculum
- Acts perpetrated by staff or volunteers should be referred to the Head of HR
- Any instance of unfair discrimination, harassment and victimisation will be dealt with under the relevant College policies and procedures. In addition, any individual is able to log a complaint via the College Customer Complaints process.

## **Supporting Policies and procedures**

The principles and aims of this policy complement and are supported by other policies and procedures relating to equality and diversity and these include:

### **Student Related:**

- FE and HE Admissions Policy
- Safeguarding and Prevent Policy
- Student Management policy
- Disability Statement
- Anti-Bullying Policy

### **Staff Related:**

- Code of Conduct
- Dignity at Work
- Disability Policy – Recruitment
- Recruitment Policy and Procedure

## Appendix 1

### Protected Characteristics covered by the Equality Act 2010

#### Race Equality

The College has a general duty to have due regard to the need to:

- Eliminate unlawful race discrimination
- Promote equality of opportunity
- Promote good relations between people from different racial groups

The College also has specific duties to help it meet the general duty. These are:

- To monitor by racial group the number of teaching staff in the College
- To take reasonable practical steps to publish annually the results of this monitoring.

#### Disability Equality

The Disability Discrimination Act (1995) outlaws discrimination against disabled people in employment, provision of education, provision of goods or services to the public, disposal or management of premises and provides for regulations to improve access to public transport. This Act was amended in 2005 to place a duty on all public sector authorities including education bodies to promote disability equality. This duty ensures that all public bodies build disability equality into the way in which they carry out their business.

This means that the College must, in carrying out all functions, have due regard to:

- Promote equality of opportunity between disabled people and other people.
- Eliminate discrimination that is unlawful.
- Eliminate disability related harassment.
- Promote positive attitudes towards disabled people.
- Encourage participation by disabled people in College life.
- Take steps to meet disabled people's needs, even if this requires more favourable treatment.

The College also has specific duties to help it meet the general duty. These are:

- To report annually on progress made.
- To review and revise the equality scheme every three years.
- To provide a statement of how disabled people have been involved in developing the scheme.
- To assess the impact of policies and practices on disability equality and where improvements can be made.
- To gather information relating to disabled staff and learners.
- To produce an action plan detailing the steps that are going to be taken to meet the general duty.

#### Gender Equality

Under the Single Equality Act 2010, the College has a general duty to:

- Eliminate unlawful discrimination and harassment.



- Promote equality of opportunity between men and women.
- Produce an equality scheme that makes clear the values, principles and standards that guide our approach to equality.

The College also has specific duties to help it meet the general duty. These are:

- To consult staff and learners as appropriate in drawing up the equality scheme.
- To gather information that is relevant as to how our policies and practices affect gender equality in the workplace.
- To be aware of the causes of any gender pay gap.
- To monitor progress of actions and publish annual reports on progress.
- To conduct and publish gender impact assessments.
- To review the implementation of the scheme at least every three years and revise accordingly.

### **Other Equality Legislation**

Under the Equality Act 2010 the College also has responsibility to address the following areas of equality:

- Sexual orientation
- Age
- Religion and belief
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity

The College has a responsibility to address other types of discrimination that are not direct. These include:

- Associative discrimination – this is discrimination against an individual because she/he associates with another person who possesses a protected characteristic
- Discrimination by perception – this is discrimination against a person because others think she/he possesses a protected characteristic.
- Harassment – College employees are entitled to complain of behaviour they find offensive, even if it is not directed at them.
- Harassment by a third party – the College is potentially liable for harassment of its staff or learners by people not employed by the College. (Example: harassment of a learner on work experience.)
- Under the SEND Code of Practice 0-25 years 2014 there is a statutory duty on the College to use “Best Endeavours” to meet the needs of learners who have 139a (transition plans) and Education, Health and Care Plans (EHCPs).