

# Equality, Diversity and Inclusion Policy

Date of Policy: January 2025Date of Review: JanuaryOwner: Clair Etchell Johnson2026 Reviewer: Samantha

Approval and Sign off Process: Corporation Rooney

**Putting Students First** 

# Contents

Chronology of amendments:	3
1. Introduction	4
2. Policy Statement	4
3. Scope	5
4. Legal and Regulatory Framework	5
5. Definitions (see Appendix 1)	6
6. Policy Objectives:	7
7. Procedures (see also appendix 2 and 3):	7
8. Responsibilities	8
9. Training and Awareness	10
10. Monitoring and Review:	11
11. Communication:	11
12. Evaluation and Reporting:	11
Appendix 1 - Types of Discrimination	13
Appendix 2 - Specific areas of practice:	16
Appendix 3 - Equality impact assessments - Process	18
Appendix 3.a - EQIA Flow Chart	22
Appendix 3.b - Equality Impact Assessment Form	23
15 Approval	30

# Chronology of amendments:

April 2024	Changes to layout to meet standardised format
January 2025	Addition of Equality Impact assessment to policy and in
	appendix 3

# 1. Introduction

The Isle of Wight College is committed to creating and maintaining an inclusive working and learning environment that respects and celebrates difference. We aim to provide a community where everyone feels able to participate fully in college life and achieve their full potential.

The college's commitment to equality, diversity and inclusion (EDI) is endorsed and led by the leadership team and governors. Our aim is for employees, students, volunteers, visitors and customers to be truly representative of all sections of society, and for all to feel respected and able to give their best. The Corporation is also committed against unlawful discrimination of customers and members of the public.

# 2. Policy Statement

The Isle of Wight College commits to:

- Ensuring that equality, diversity and inclusivity is embedded in our organisation and is experienced by all our staff, students, volunteers, governors, customers and visitors.
- Creating an inclusive learning and working environment that supports good relations between people and challenges prejudice, intolerance and discrimination in all its forms.
- Upholding the principle of diversity to ensure that the differences between people and groups is understood, valued and respected
- Ensuring that the college meets its commitments under the Equality Act 2010 in relation to staff, students, visitors and governors.
- Supporting the right of individuals and groups to hold their own beliefs and values but will
  not tolerate these being manifested in a way that intimidates, humiliates or creates a hostile
  or degrading learning or working environment.
- Ensuring that equality, diversity and inclusion is fully integrated into the teaching and learning experience
- Ensuring that students receive fair and equitable treatment in relation to admission, administration and assessment procedures
- Ensuring that publicity material positively promotes diversity in the college community
- Supporting a range of activities and campaigns each year to celebrate key national equality events and religious festivals
- Introducing positive action initiatives where patterns of under-representation and differences in outcomes for staff and learners are identified.
- All staff receiving timely and relevant equality, diversity and inclusion training; training will be delivered through a mixture of induction, face-to-face and online sessions.
- Positive action will be taken to ensure that particular groups of learners who are found to be more vulnerable to leaving their course early e.g. young parents, Looked After Children and Care Leavers, asylum seekers, etc. will be offered additional support
- Ensuring that our recruitment, training and promotion processes are fair and transparent (see Recruitment and Selection policy)
- Carrying out an equality impact assessment before any significant change is implemented or when we are establishing or reviewing policies, procedures, practices, plans and activities.
- Establishing and supporting staff groups where staff can share experiences and where they can help the organisation meet the needs of all its staff and students

- Developing student voice and student groups to share ideas and escalate concerns so that we can learn from their lived experiences.
- Publishing an equality information, report each year and setting out equality objectives every four years. The equality objectives and equality and diversity action plan will be monitored by the Equality, Diversity and Inclusion working group and the Corporation on a termly basis
- Using an evidence-based approach where possible to inform activities to increase equality and to measure the impact of any changes.

# 3. Scope

This policy applies to all staff, governors, students, customers, volunteers, workers supplied by agency and contractors. The policy applies to all processes relating to employment, education, training and interactions with staff, students, customers and contractors.

Provide equality, fairness and respect for all our employees and students, whether temporary, part-time or full-time

Oppose and avoid all forms of unlawful discrimination. This includes:

- pay and benefits
- terms and conditions of employment
- · dealing with grievances and discipline
- dismissal
- redundancy
- leave for parents
- requests for flexible working
- selection for employment, promotion, training or other developmental opportunities

# 4. Legal and Regulatory Framework

Our policy aligns with guidance from the Department for Education (DfE) and relevant legislation including:

- Equality Act 2010: guidance GOV.UK (www.gov.uk)
- The Children and Families Act 2014
- Working Together to Safeguard Children 2023
- Education Act 2002 (legislation.gov.uk)
- SEND code of practice: 0 to 25 years GOV.UK (www.gov.uk)
- Supporting pupils with medical conditions at school GOV.UK (www.gov.uk)
- Public Sector Equality Duty: guidance for public authorities 2023

# 5. Definitions (see Appendix 1)

## 5.1 Equality

Equality refers to the state of being equal, especially in status, rights, and opportunities. It's a fundamental principle that underpins the idea of fairness and justice in society, ensuring that all individuals are treated equally and have the same chances to succeed, regardless of various social distinctions.

## 5.2 Diversity

Diversity refers to the presence of differences it means understanding that each individual is unique, and recognising our individual differences. These can be along the dimensions of race, ethnicity, gender, sexual orientation, socio-economic status, age, physical abilities, religious beliefs, political beliefs, or other ideologies. It is about understanding each other and moving beyond simple tolerance to embracing and celebrating the rich dimensions of diversity contained within each individual.

#### 5.3 Inclusion

Inclusion is the practice or policy of providing equal access to opportunities and resources for individuals who might otherwise be excluded or marginalised, such as those who have learning or physical disabilities and members of other minority groups.

#### 5.4 Equity

Equity is about ensuring that everyone is treated fairly by removing barriers to resources or opportunities that some groups in society face. It involves recognising that different people have different needs and providing the necessary support to achieve equal outcomes.

#### 5.5 Accessibility

Accessibility means that individuals can do what they need to do in a similar amount of time and effort as someone who does not have a disability. It means that individuals are empowered, can be independent and will not be frustrated by something that is poorly designed or implemented. Accessibility can apply to both physical elements (an environment such as a classroom or workplace) and digital elements (relating to websites and apps).

#### 5.6 Breaches of EDI

An Equality, Diversity, and Inclusion (EDI) breach in college refers to any action or behaviour that contravenes the principles and policies designed to ensure fair treatment and non-discrimination based on protected characteristics. This could include acts of discrimination, harassment, or victimisation against students, staff, or visitors. The college is obligated to comply with laws such as The Equality Act 2010, which requires an environment free from prejudice and unfair discrimination. Breaches can result in serious consequences, including legal action and damage to the college's reputation. It is essential that the college maintains a positive and inclusive learning environment.

# 6. Policy Objectives:

- Promote equality
- Encouraging diversity
- Achieving inclusivity
- Eliminating all forms of discrimination
- Ensuring that the college is fully accessible
- Consistently developing our practices
- Monitoring and evaluating through qualitive and quantitative data.

The following college policies and documents support this policy:

- Safeguarding Policy mylifeiwcollegeac.sharepoint.com/sites/HumanResources/Shared
   Documents/Forms/AllItems.aspx?id=%2Fsites%2FHumanResources%2FShared
   Documents%2FSafeguarding%2FSafeguarding Policy 24-25 final TBR\_Oct
   24%2Epdf&parent=%2Fsites%2FHumanResources%2FShared Documents%2FSafeguarding
- Student positive behaviour policy
   mylifeiwcollegeac.sharepoint.com/sites/HumanResources/Shared
   Documents/Forms/AllItems.aspx?id=%2Fsites%2FHumanResources%2FShared
   Documents%2FPositive Behaviour Management Policy\_TBR March
   2025%2Epdf&parent=%2Fsites%2FHumanResources%2FShared Documents
- Staff Discipline and Grievance Procedures <u>Disciplinary Procedure (Employees)</u>, <u>TBR November</u>
   2022 rev 1.docx
- Equality Information Reports PSED Equality and Diversity Isle of Wight College
- Pay framework policy Pay Framework Policy TBR July 2023.docx
- Safer Recruitment and Selection policy <u>Safer Recruitment and Selection Policy TBR Sept</u> 2023.docx
- Complaints procedure <u>mylifeiwcollegeac.sharepoint.com/sites/HumanResources/Shared Documents/Forms/AllItems.aspx?id=%2Fsites%2FHumanResources%2FShared Documents%2FComplaints Procedure%2C TBR July 2024%2Epdf&parent=%2Fsites%2FHumanResources%2FShared Documents
  </u>
- Harassment and bullying policy Harassment and Bullying Policy TBR December 2023.docx

# 7. Procedures (see also appendix 2 and 3):

7.1 Concerns and complaints Where complaints are raised about behaviours, actions or words which do not meet the expectations set out in this policy, these will be investigated. All complaints will be handled in a confidential manner and anyone can report their concerns through different channels- in person, to any of the EDI working group through email <a href="EqualityandDiversity@iwcollege.ac.uk">EqualityandDiversity@iwcollege.ac.uk</a> or through the college website.

Investigations will be conducted by a neutral party, who will gather all relevant documentation, interview witnesses, and collect any other pertinent information. A report will be prepared based on the findings of the investigation, and Head of EDI or other designated member of staff will make a decision about the

outcome and next steps. This decision will be communicated to the individual who raised the complaint, if appropriate. The college will then follow the relevant policies for students and staff.

Students: This will be managed via the student complaints process.

Staff: Staff can raise a grievance using the Grievance policy (including bullying and harassment) if they are subject to behaviour which falls outside of the expectations of this policy. In addition, any member of staff found to be acting in breach of this policy will be managed in line with the college's Positive Behaviour Policy.

- 7.2 Reasonable Adjustments: Implementation of reasonable adjustments for students and staff with disabilities to remove barriers and meet individual needs.
- 7.3 Equality Impact Assessment (see Appendix 3): An Equality Impact Assessment is a way of determining whether an existing or proposed function, policy, procedure, practice or service does (or may) have an "adverse impact" on some sections of society. The "adverse impact" may often be the result of not considering the needs of anyone with a protected characteristic.

For any function, strategy, or policy development and implementation, the college will conduct an Equality Impact Assessment (see Appendix 3) to ensure that there is no adverse impact on any sections of society.

# 8. Responsibilities

The Corporation are responsible for ensuring that:

- The College is compliant with the equality legislation and the codes of practice supporting it.
- The Corporation proactively considers equality, diversity and inclusion as part of its decisionmaking process.
- The Equality, Diversity and Inclusion Policy, Equality Objectives and action plan are implemented effectively.
- The membership of the Corporation reflects the diversity of the local community.
- Equality, diversity and inclusion is fully integrated into the College Strategic Plan.
- The Corporation receives an annual equality and diversity update that monitors progress on the equality objectives and action plan.
- To support the Corporation in meeting its duties, it nominates a Governor to have designated responsibility for Equality, Diversity and Inclusion.

The Principal and Senior Management Team are responsible for:

- Providing leadership and acting as champions to promote equality, diversity and inclusion across the college community.
- Working with the Corporation to ensure that the policy, equality objectives and action plan are implemented effectively.
- Overseeing the continuing application and development of the policy cross college in line with legislation and corporate strategic objectives.
- Ensuring that appropriate action is taken against individuals working on behalf of the College, or studying at the College, who do not act in accordance with this policy.

# The Head of Learning (Access, Foundation Learning and High Needs) is responsible for:

- Chairing the Equality, Diversity and Inclusion Working Group and implementing the action plan and activities
- A positive, inclusive ethos is created and ensuring student and staff feedback is collated and feeds into the development and design of EDI in college
- Championing equality, diversity and inclusion issues, internally and externally.
- Preparing, monitoring and reviewing the equality objectives and action plan.
- Reporting progress on equality issues on a termly and annual basis or more frequently if required.
- Advising and developing policies, procedures and resources.

## Heads of Learning and Teaching and Learning Managers are responsible for:

- Ensuring that staff have a clear vision and shared understanding of what the College is aiming to achieve through the policy.
- Implementing the policy as part of their day-to-day management of staff and in applying employment policies and practices in a fair and equitable way.
- Ensuring equality, diversity and inclusion issues are addressed in performance reviews.
- Ensuring all staff act in accordance with the policy providing support and direction where necessary
- Effectively managing and dealing promptly when investigations identify issues relating to potential discrimination, bullying or harassment.
- That curriculum activities actively incorporate equality, diversity and inclusion themes
- Their teams provide teaching, learning and assessment methods, support and resources that meet the individual needs of students and staff
- Taking the lead in creating a positive, inclusive ethos that challenges inappropriate language and behaviour and celebrates diversity.

# All staff are responsible for ensuring that they:

- Have read and understood the policy.
- Implement the policy in their day-to-day work and model behaviour that reflects the spirit of the policy.
- Treat people with respect and dignity in all their interactions.
- Notify their line manager of any concerns with regard to the conduct of other employees, students, visitors or third parties.
- Help to build an inclusive culture where diversity is valued and people feel confident to bring their whole selves into the working and learning environment.
- Challenge inappropriate and discriminatory language and behaviour by staff, students and other users of our services.

# Human Resources (HR) are responsible for:

- Developing employment policy and strategy on equality, diversity and inclusion.
- Providing guidance to line managers and staff.
- Supporting managers in investigating issues relating to potential discrimination.
- Monitoring and reporting on the workforce equality data to the Equality, Diversity and Inclusion
   Working Group and senior managers and governors. This includes reporting on the gender pay

- gap and actions being taken to improve gender equality, as well as monitoring and taking action with regard to all other protected characteristics.
- Facilitating training and development initiatives in relation to equality, diversity and inclusion.

# All students are responsible for ensuring that they:

- Adhere to the Student Charter and treat all members of the college community with dignity and respect.
- Create and maintain a learning and social environment where there is zero tolerance for bullying, harassment and discrimination.
- Support and promote the equality, diversity and inclusion policy and procedures.
- Understand the consequences of contravening equality legislation and this policy.

# Partners, Contractors and Service providers

- All partners, contractors and service providers will be responsible for adhering to any equality guidelines in agreements or contracts.
- The Isle of Wight College is committed to ensuring that those organisations with which it works and employs will demonstrate their commitment to equality, diversity and inclusion and have policies and procedures in place to achieve this.

# 9. Training and Awareness

- 9.1 All college staff and governors complete EDI training during their induction period, it then a refresher course needs to be completed every 3 years after. Atlas sends automatic reminders to staff to complete training and Head of HR send out a report to Managers to highlight staff that are missing mandatory training.
- 9.2 Ongoing training for all staff available through online training/ awareness courses. EDI will be included in "the Loop" covering different areas that are upcoming for EDI to raise awareness about different activities.
- 9.3 Celebrating and raising awareness for different groups i.e.; deaf awareness week, mental health awareness week etc and doing across college activities for both students and staff to participate in different workshops / events.
- 9.4 Staff workshops on EDI matters will operate on SD days in the academic year.

# 10. Monitoring and Review:

- 10.1 Together with the Assistant Principal, HoLs and TLMs will conduct periodic assessment of the policy's implementation to review whether the policy is achieving its intended outcomes.
- 10.2 The TLM will keep teaching and support staff informed of any changes to policy and procedure and ensure that staff understand and comply with the process.
- 10.3 The policy and its implementation will be reviewed annually or whenever significant changes occur.
- 10.4 The Head of EDI together with curriculum HoLs will conduct audits in departments to assess compliance with the policy and advise on any training or development needs.
- 10.5 Feedback will be obtained from relevant stakeholders, staff, students, parent/carers, external professionals, employers and other stakeholders.
- 10.6 Data on EDI will be monitored by the HoL for Access, foundation learning and High Needs in order to inform on any patterns or emerging issues and to analyse and review the effectiveness of interventions and responses. This will be reported through to the Assistant Principal.
- 10.7 E Trackr reports, survey information, student voice and feedback will be used to inform the review process.

# 11. Communication:

- 11.1 The policy will be in "the loop" and where staff can find the policy on the college internet.
- 11.2 The policy will communicated with students through focus groups where they will be asked for their views.
- 11.3 Information about the different workshops / activities will be communicated through in the loop and staff emails. Students will be informed by the teaching teams.

# 12. Evaluation and Reporting:

- 12.1 The EDI working group will collect and analyse data on EDI categories for both students and staff. This involves demographic data, enrolments by protected characteristics, participation in enrichment, achievement gaps between groups, progression rates to higher education or employment, retention rates, success rates in completing courses/programmes and results from surveys.
- 12.2 The Head of EDI and the EDI working group will conduct regular reviews of policies and practices to ensure that they align with EDI principles. This includes the outcome of equality impact assessments on policies and practices, changes made as a result of these assessments and data on community engagement and outreach.
- 12.3 The impact of actions taken to promote EDI will be evaluated. This includes evidence of progress towards achieving equality objectives and future plans to continue improving EDI within the college.

12.4 EDI reports will be provided to governors, the senior leadership team and any other organisations to which the college is required to provide this information.		

# Appendix 1- Types of Discrimination

- Direct discrimination Direct discrimination occurs when someone is treated less favourably than another person because of a protected characteristic (age, disability, gender, race, religion or belief, sexual orientation and gender reassignment) they have or are thought to have (see perceptive discrimination below).
- Associative discrimination Applies to age, disability, gender, race, religion or belief, sexual orientation and gender reassignment. This is direct discrimination against someone because they associate with another person who possesses a protected characteristic. It applies even if the person does not actually possess that characteristic.
- Indirect discrimination is when: there is a policy, practice or rule which applies to everybody in the same way, but it places people who share a protected characteristic at a disadvantage. The organisation or person applying the policy, practice or rule cannot show there is a good enough reason for it (this is known as a proportionate means of achieving a `legitimate aim'.) Indirect discrimination can be justified if it can be shown that the organisation acted reasonably, i.e., that it is a proportionate means of achieving a legitimate aim. If the 'legitimate aim' is solely with the aim of reducing costs, it is unlikely on its own to meet the test of being reasonable and proportionate.
- Failure to make reasonable adjustments This occurs when an establishment fails to consider
  whether reasonable adjustments can be made to allow someone with a disability to use
  services/facilities or undertake employment.
- Harassment occurs when someone engages in 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 and where such conduct could reasonably be considered as having that effect. Harassment is not dependent on an intention to cause distress or hurt but is assessed by the impact the behaviour has on the recipient provided that it is reasonable in the circumstances to consider that the conduct in question constitutes harassment. As a result, it is possible that behaviour that is acceptable to some members of staff will cause embarrassment, distress or anxiety to others. Harassment applies to all protected characteristics except for pregnancy and maternity and marriage and civil partnership. Members of staff 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. Members of staff are also protected from harassment because of perception and association. Unlawful discrimination on the grounds of the equality protected characteristics will not be tolerated in any form.

Harassment can take many forms, which may include, but is not limited to:

- Unnecessary or unwanted physical conduct ranging from touching to serious sexual or physical assault;
- Verbal conduct such as sexist, racist or homophobic comments or innuendo, derogatory remarks about protected characteristics, comments of a personal nature, suggestive remarks, inappropriate jokes or language;
- Display, storage or circulation of offensive material (including information held on computer).

Harassment is normally characterised by more than one incident of unacceptable behaviour, particularly if it reoccurs once it has been made clear by the victim that they consider it offensive. A single incident may constitute harassment however, if it is sufficiently serious.

- Victimisation occurs when an employee 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.
  An employee is not protected from victimisation if they have maliciously made or supported an
  untrue complaint.
- Bullying is not dependent on an intention to cause distress or hurt but is assessed by the impact the behaviour has on the recipient (even if it is not directed at that individual); provided that it is reasonable in the circumstances to consider that the conduct in question constitutes bullying. As a result, it is possible that behaviour that is acceptable to some members of staff will cause embarrassment, distress or anxiety to others. It is usually persistent, offensive, abusive, intimidating, malicious or insulting behaviour or unfair use of sanctions by one person towards another, which has the purpose, or effect, of intimidating, belittling or humiliating the recipient, leading to a loss of self-esteem. Bullying is recognised as a serious management issue and is often unreported. People affected by bullying often feel the matter appears trivial or that they may have difficulty in describing it. Examples of bullying may include, but are not limited to:
  - Persistent unnecessary criticism;
  - shouting at colleagues in public or private;
  - o deliberate isolation by ignoring or excluding a person;
  - o withholding information or removing areas of responsibility without justification;
  - o spreading malicious rumours or making inappropriate personal comments;
  - o undermining a person's self-respect by condescending or threatening treatment that humiliates or intimidates the individual;
  - o cyber bullying (e.g., by email, text or through social networking sites);
  - picking on one person when there is a common problem;
  - setting unrealistic targets or excessive workloads; setting an individual up to fail (e.g., by giving inadequate instructions or unreasonable deadlines)
- Sexual Misconduct relates to all unwanted conduct of a sexual nature. This includes, but is not limited to:
  - Sexual harassment (as defined by Section 26 (2) of the Equality Act 2010)
  - Unwanted conduct which creates an intimidating, hostile, degrading, humiliating or offensive environment (as defined by the Equality Act 2020)
  - Assault (as defined by the Sexual Offences Act 2003)
  - o Rape (as defined by the Sexual Offences Act 2003)
  - Physical unwanted sexual advances (as set out by the Equality and Human Right Commission: sexual harassment and the law, 2017)
  - Intimidation or promising resources or benefits in return for sexual favours (as set out by the Equality and Human Rights Commission: sexual harassment and the law, 2017)
  - Distributing private and personal explicit images or video footage of an individual without their consent (as defined by the Criminal Justice and Courts Act 2015) These definitions include harassment and sexual misconduct through any medium, including for example, online.

 Microaggressions: are defined as the everyday, subtle, intentional or unintentional statements, actions or behaviours that communicate some sort of bias toward historically marginalized groups.
 An example of a micro aggression would be a member of staff following a black person presuming that they are going to cause damage or steal.

# Appendix 2- Specific areas of practice:

Recruitment Please see the college's recruitment policy (for a detailed account of how we recruit and select students and staff in keeping with recruitment and application policies). The college website also set out our commitment to Equality, Diversity and Inclusion sharing our practice, providing open and transparent access to our gender pay data and setting out our action plans. Making reasonable adjustments If you are disabled, or become disabled during your time at the college, you are encouraged to tell us about your condition. This is to enable us to support you as much as possible and to ensure that you are not treated less favourably because of something related to your disability. You may also wish to advise your line manager, the Human Resources Team, or the Student Support Services, Additional Learning Support Teams of any reasonable adjustments to your working or learning conditions, or the duties of your job or studies, which you consider to be necessary, or which would assist you in the performance of your duties or studies. You can do this as and when the need arises, or during your appraisal, review meetings, or student support meetings. This may involve an additional piece of equipment or software, or changes to working or learning practices. This will involve the member of staff, their line manager, HR, or students and Student Support Services working together, and may also include the involvement of a medical adviser.

Ensuring that all processes are fair and free from bias We want to encourage input from both staff and students into our policies and practices. We do this already by consulting with staff groups and trade unions, and we want to grow this practice by including the views from specific staff groups and student groups, such as the Student Executive Committee, as these are established. All HR policies are reviewed to ensure that they do not have an adverse impact on any group of staff or students.

Supporting staff and students with mental health concerns We recognise that many of our staff and students may experience a period of mental ill health at some point in their lives. We have a supportive framework in place, including mental health first aid practitioners, external counselling options, and training for managers to further their own understanding in this field.

Part time and fixed-term employees The college will monitor its use of fixed-term employees and their conditions of service, to ensure that they are being offered appropriate access to benefits, training, promotion and permanent employment opportunities. We will, where relevant, monitor their progress within the College to ensure that they are accessing permanent vacancies.

Agency workers the college will monitor agency workers to ensure that they are treated no less favourably than a comparable worker in relation to accessing collective facilities and amenities at the College. The college will also monitor the use of temporary work agencies and; subject to the exceptions set out in the Agency Workers Regulations 2010, will ensure that all agency workers have the same basic working conditions they would have been entitled to had they been recruited by the college directly into a comparable role.

Concerns and complaints Where complaints are raised about behaviours, actions or words which do not meet the expectations set out in this policy, these will be investigated. Students: This will be managed via the student complaints process.

Staff: Staff can raise a grievance using the Grievance policy (including bullying and harassment) if they are subject to behaviour which falls outside of the expectations of this policy. In addition,

any member of staff found to be acting in breach of this policy will be managed in line with the college's Disciplinary policy. Similarly, students can raise a grievance using the Student Complaints process if they experience behaviour that does not meet the expectations of this policy. In addition, any member of staff or student found to be acting in breach of this policy will be managed in line with the college's Disciplinary policy and Positive Behaviour Policy respectively.

Taking additional (positive) action From time to time, the college may decide that proportionate positive action is taken where there is evidence that participation is disproportionately low for people who share a protected characteristic, where they experience a disadvantage or in order to meet their different needs. For example, this could include advertising roles in a particular market to attract particular candidates based on a protected characteristic, or adding positive promotional images of male students in traditionally female dominated subjects to course material.

Monitoring and review The college sets equality, diversity and inclusion objectives and has a EDI working group to oversee that the college continually works to achieve its objectives. The college monitors the profile of its students and staff by gender, age, race, sexual orientation, marital status, disability and ethnicity. Monitoring at course level is integrated into the regular Quality monitoring reviews. Student analysis is reported in termly Progress Review meetings and specific targets are set in curriculum and college Quality Improvement Plans to reduce achievement gaps for underrepresented or under performing groups.

Student enrolment, retention, and achievement, student survey and complaints are monitored termly, and the findings are used to inform the annual Self-Assessment Reviews. Students' views are identified by means of satisfaction surveys, student voice and student focus groups. Monitoring for staff is undertaken by the HR team. This is carried out using information held on the college HR system, as well as other data, such as the annual staff survey. An annual public sector equality and diversity report (PSED) is published on our website. This reporting will also meet the college's legal and contractual responsibilities.

# Appendix 3- Equality impact assessments- Process

#### WHAT IS AN EQIA?

An Equality Impact Assessment is a way of determining whether an existing or proposed function, policy, procedure, practice or service does (or may) have an "adverse impact" on some sections of society. The "adverse impact" may often be the result of not taking into account the needs of anyone with protected characteristic.

It is important that everyone involved in function, strategy and policy development and implementation is aware of the need to undertake EQIAs as a core and on-going part of their work. Doing nothing with regard to the impact on people who face discrimination and marginalisation may be unlawful.

At the completion of the EQIA process there will be a summary report published to let people know the outcome of the assessment.

#### How to Conduct an EQIA.

If there is any doubt whether a particular function, strategy, project or policy is relevant to promoting equal opportunities, please contact a member of the HR or Head of Learning Foundation Learning and High Needs.

#### WHEN TO CARRY OUT AN EQIA

EQIAs have to be carried out on all functions, strategies, policies and projects that are part of the business planning process each year; and all proposed, revised or existing strategies, policies and projects. EQIAs should also be carried out on a regular basis to ensure they are being implemented in an equitable way. Any amendment to functions, strategies, policies and projects should be through the EQIA process.

Impact assessments should be initiated at the point of deciding on the aims and objectives for a piece of work. This will ensure that we are thinking from the outset about the potential impact on different equality strands.

## STAFF MEMBERS RESPONSIBLE FOR CONDUCTING EQIA

All college staff with a responsibility for developing and subsequently reviewing functions, strategies, projects and policies should be able to conduct an EQIA. To support this, HR training on completing Impact Assessments is a core element of training for all staff involved in policy design and all academic staff who operate in a management capacity (Heads of Learning and Teaching & Learning Managers).

#### **APPROVAL AND SIGNATURE**

EQIAs must be submitted and countersigned by a member of the Senior Management Team to ensure that they have been conducted thoroughly, fairly and are compliant with college policy. No EQIA will be viewed as complete or acceptable for communication without this.

All managers are responsible for incorporating equality and diversity into their functions, projects, policy areas, and strategies and for assessing the equalities impact. This should be a continuous process, starting at the very beginning of reviewing or considering a function, policy, strategy or project and continuing through to evaluation and monitoring of the work or service delivered.

#### **PUBLISHING INFORMATION**

No policies can be placed on the college intranet/internet without being equality impact assessed and countersigned for legitimacy by a member of the Senior Management Team.

#### **AUDIT**

For all policies and strategies, evidence that the EQIA has been conducted must be retained on file for audit purposes. This information will be held in one of 2 specific locations, dependent on the nature of the item it relates to:

- For EQIAs relating to confidential corporation matters the HR department
- For EQIAs relating to other matters the Quality Team.

This will either be the completed screening form that documents that no adverse impact was identified or, where adverse impacts were identified, a full assessment and associated action plan. Details of any research or data used, or consultation undertaken during the EQIA process must be referenced.

A list of functions, strategies, policies and projects that have been assessed and fall under the legal duties of the college will be available for reference. A summary report will be available on the internet or intranet as applicable. For confidential matters, the head of HR will be the contact point for EQIAs relating to these items.

#### THE SCREENING PROCESS

The EQIA is carried out in two stages:

## **Stage 1: Standard Screening Form**

This includes an assessment of the relevance of equality issues to the function, strategies, policies and projects. It should produce estimates or signs of possible adverse, neutral or positive impact, complemented by existing data/consultation sources and information, where possible. This stage is undertaken by the manager responsible for the function, strategy, policy or project.

#### Stage 2: Full Equality Impact Assessment Form

This next stage is only required if the stage 1 standard screening points to concerns about potential adverse impact on particular groups.

All completed stage 1 and stage 2 EQIAs must be submitted to a member of the Senior Management Team.

#### WHAT IS MEANT BY "IMPACT"

A negative or adverse impact: where the item being assessed is judged to disadvantage one or some equality target groups. This disadvantage may also be differential, where the negative impact on one group is likely to be greater than on another.

A positive impact: where the item being assessed is judged as having a positive influence on a group or improves equal opportunities and/or relationships between groups. Positive impact should be recorded, as we have a duty to proactively promote equality.

**Neutral impact:** applies when the item being assessed is judged to have a similar impact upon all groups.

#### PREPARATION AND UNDERTAKING THE ASSESSMENT

- Start the EQIA process at the earliest stage of planning/development
- Allow adequate time for the assessment process
- Ensure that relevant stakeholders are involved in direct consultations
- Seek advice on consultation processes, if necessary with the Heads of Learning
- Consultation methods must be appropriate, avoiding tokenism or manipulation
- Use the EQIA form to record the process and explain relative weighting of evidence in decision making
- Record actions to be carried out to rectify any adverse impact and monitor implementation
- Communicate decisions and changes resulting from the EQIA to relevant equality target groups that were consulted with, in a format that is appropriate to their needs
- On-going monitoring of impact once the new policy or proposal has been authorised

#### **CONSULTATION**

Consultation must be an on-going process to inform the development of the item under review. It can be undertaken within a variety of groups, such as advisory groups, focus groups, user groups, stakeholders, staff or trade unions.

The groups consulted with will be critical. It will affect both the legitimacy of the piece of work when it is put into effect, and the trust that people feel they can place in the assessment. The aim should be to make sure that anyone who is likely to be affected by the policy, both inside and outside the college, has the opportunity to express their views, concerns and suggestions.

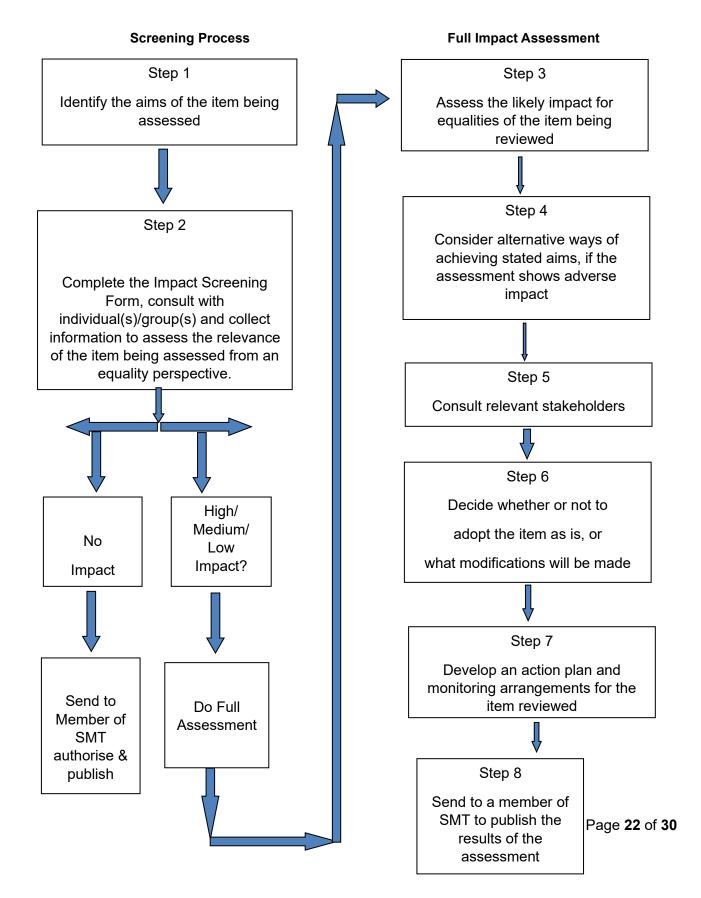
Using a variety of consultation methods will ensure accommodation of people's different circumstances and preferences.

#### WHAT TO DO IF AN ADVERSE IMPACT IS IDENTIFIED?

If evidence of any adverse impact is found during the EQIA process, the manager responsibly has four options.

- A. Check whether the adverse impact can be justified within the aims of the function/policy/strategy/project. This may be due to it's importance (for example, it is justifiably targeting the special needs of particular groups) and there is no other way of achieving the aims of the function/policy/strategy/project.
- B. Determine whether the function/policy/strategy/project can be adapted to meet its original aim, but without unjustifiable adverse impact
- C. **Revise the proposed function/policy/strategy/project** to meet any specific needs identified through consultation.
- D. **Consult again on the revised function/policy/strategy/project**, where appropriate. If possible, the function/policy/strategy/project should be piloted, and its operation monitored, before it is put into effect fully and formally. The use of a pilot provides opportunity to monitor and identify the possible impact of the function/policy/strategy/project on a sample group.

# Appendix 3.a- EQIA Flow Chart



# Appendix 3.b- Equality Impact Assessment Form



Section one: screening for impact	
Name of function/strategy/project/policy:	
Manager responsible for completing the assessment:	
1. What is the main purpose of the item being	assessed?
2. List the main activities of the function/strategareas.	gy/project/policy. For strategies list the main policy
3. Who will be the main stakeholders/users of	the item being assessed?
4. Have you already consulted with people aboand with whom.	out this work? If yes, briefly describe what you did

- 5. Using the table below indicate where you:
  - a) Think that the function/strategy/project/policy could have a negative impact on any of the protected characteristics in your reasons detail whether you think it has a high, medium or low impact
  - b) Think that the function/strategy/project/policy could have a positive impact or contribute to promoting equality, equal opportunities or improving relations between people who share a protected characteristic and those who do not

	Positive impact	Negative impact	No impact	Reason and evidence
Pregnancy e.g.		~		Adjustments needed to working or learning conditions. Ensure fair treatment in terms of opportunities for advancement and participation in certain activities.
Gender & Gender Reassignment				
Sexual orientation				
Race and Ethnicity				
Religion or Belief				
Disability				
Pregnancy & Maternity				
Civil Partnership				

6. If there is no evidence that the item being assessed promotes equality, equal opportunities or improved relations – could it be adapted so that it does? If so, explain how.			
7.Are there any other policies, services, straneed to be consulted, alongside this screeni	•		
If there are <b>no negative</b> impacts please sign ar are satisfied that an initial screening has strategy/policy/project and a full EQIA is <b>not</b> req	s been carried out on this function/		
If there is a <b>negative</b> impact please sign below and then you must complete section two of this form.			
Signed:	Date:		
Print name:			
Manager responsible			
Signed:	Date:		
SMT			

Please forward an electronic copy of your EQIA to a Member of SMT prior to self-signature. Once the EQIA has been agreed, it shall be printed and signed, and a summary may be published as appropriate on the intranet/internet

Section two: full assessment				
Name of function/strategy/project/police	Name of function/strategy/project/policy:			
Part A				
Looking back at section one of function/strategy/policy/project coul			concerns that the	
Age		Disability		
Gender inc. Gender Reassignment		Race/Ethnicity		
Sexual Orientation		Faith or belief		
Maternity/Paternity		Marriage & Civil Partnership		
2. Summarise the likely negative impa	cts			
3. Consultation				
What previous or planned consultation has taken place/will take place with groups/individuals from equality strands? If there has already been consultation what does it indicate about the negative impact of this function/strategy/project/policy?				
Protected Characteristic		Summary of consultation car planned	ried out or	
Age				
Gender & Gender Reassignment				
Sexual Orientation				
Race and Ethnicity				

Disability	
Faith or Belief	
Pregnancy & Maternity	
Marriage & Civil Partnership	
4. What, if any, research material was used?	

What changes do you propose to make to the function/strategy/project/policy as a result of research and consultation?

Negative Impact	Changes Proposed	Lead	Timescale	Will this address negative impact? Yes/No	Resources Implication	Comments

6. If there are gaps in your previous or planned consultation and research, are there any experts/relevant groups that can be contacted to get further views or evidence on these issues?			
YES [ (please list them and explain how you wil	l obtain their views)		
NO 🗆			
Part B			
Complete this section after consultation and resear	arch has been carried out.		
<ol> <li>As a result of this assessment and available ev state whether any changes will be made or pla function/strategy/project/policy.</li> </ol>			
How will this process further assess the impact function/strategy/project/policy is non-discriming func	natory?		
Please sign the EQIA, retain a copy and send authorised and published by SLT	a copy of the full EQIA to be		
Signed: (Manager responsible)			
Name:	Date:		
Signed:(SLT)	Date:		

# 15. Approval

Clair Etchell-Johnson	Author	Head of Foundation Learning and High Needs
Samantha Rooney	Approved	Assistant Principal
Governors	Final Sign off	Governing Body