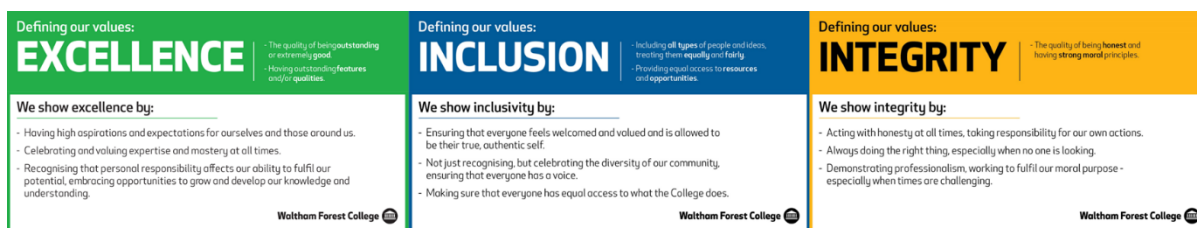


Equality, Diversity and Inclusion policy

Date Of Issue	September 2023
Next Review	September 2024, or when required by legislations or the needs of the College if sooner
Approved by	SLT
Lead	Director of Human Resources and OD





1.0 Introduction

Waltham Forest College's core business is to provide inclusive and responsive "first steps" and "second chances" education and training. The College is committed to the promotion and implementation of equal opportunities and positive attitudes towards diversity of staff and learners and seeks to ensure that everyone has an equal opportunity to succeed regardless of their starting point. This Equality and diversity policy describes in a single document how the College will fulfil its statutory duties to promote equality of opportunity and avoid discrimination.

2.0 College Commitments

The College celebrates and values the diversity brought to its workforce and student body by individuals regardless of any personal characteristics personal choices or disability and will treat all employees and students with respect and dignity and aim to ensure that all employees have equal opportunities for training and promotion. The College will work towards the elimination of discrimination conscious or otherwise and eliminate harassment to any employee. The college will aim to have up to date materials available to all to promote understanding of any personal characteristics, personal choices, or disabilities.

3.0 Purpose and Scope of the Equality Scheme

The College's Equality Scheme has the following main purposes:

- To ensure there is equality for all learners and potential learners when accessing services and provision offered by the College
- To ensure there is equality of opportunity for all learners in terms of outcomes
- To ensure there is equality for all current and potential employees of the College
- To promote positive attitudes towards equality and diversity
- To promote a working and learning environment that is free from discrimination, harassment or victimisation and where there are positive relations between people of different racial groups, cultures, religions, ages, sexuality, abilities and disabilities, choice of identification and all genders and reassignments
- To meet legal requirements

This Scheme applies to all members of the College's community, including various agencies and others with whom the College works.

4.0 Legal Framework

- The Equality Act 2010 brought together all the legal requirements on equality that the private, public and voluntary sectors need to follow. It affects equality law at work and in delivering services.
- The message (or purpose) of the Equality Act is that everyone has the right to be treated fairly at work or when using services. It protects people from discrimination on the basis of certain characteristics. These are known as protected characteristics, and they vary slightly according to whether a person is at work or using a service. All employers and

service providers have a responsibility under the law to treat their employees and service users fairly.

- There are nine personal characteristics that are protected under the legislation: age, disability, gender reassignment, marriage or civil partnership status, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

5.0 The main forms of prohibited conduct are:

Discrimination:

- Treating a person worse than someone else because of a protected characteristic (known as **direct discrimination**).
- Putting in place a rule or way of doing things that has a worse impact on someone with a protected characteristic than someone without one, when this cannot be objectively justified (known as **indirect discrimination**).
- Treating a disabled person unfavourably because of something connected with their disability when this cannot be justified (known as **discrimination arising from disability**).
- Failing to make reasonable adjustments for disabled people.

Harassment:

- Unwanted conduct which has the purpose or effect of violating someone's dignity or which is hostile, degrading, humiliating or offensive to someone with a protected characteristic or in a way that is sexual in nature.

Victimisation:

- Treating someone unfavourably because they have taken (or might be taking) action under the Equality Act or supporting somebody who is doing so.

As well as these characteristics, the law also protects people from being discriminated against:

- By someone who wrongly perceives them to have one of the protected characteristics.
- Because they are associated with someone who has a protected characteristic. This includes the parent of a disabled child or adult or someone else who is caring for a disabled person.

6.0 Public Sector Equality Duty:

The Equality Act places a duty on public sector employers, including the College to do three things:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic and those who do not.

These are sometimes referred to as the three aims or arms of the general equality duty.

The Act helpfully explains that having due regard for advancing equality involves:

- Removing or minimising disadvantages suffered by people due to their protected characteristics.
- Taking steps to meet the needs of people from protected groups where these are different from the needs of other people.
- Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low.

The new duty covers eight of the nine protected characteristics (excluding marriage or civil partnership). However, the College needs to have due regard to the need to eliminate unlawful discrimination against someone because of their marriage or civil partnership status.

7.0 Equality Act Specific Duties

The specific duties require the College to:

- Publish information, by 31 January 2012 and at least annually thereafter, to show our compliance with the Public Sector Equality Duty; and
- Set equality objectives and publish them by 6 April 2012, and at least every four years after that.

All information must be published in a way that is easily accessible to the public. The College currently publishes annual data on our workforce and student population. This data is made available to all staff and the general public through our website: <http://www.waltham.ac.uk/about-us/equality-and-diversity.html>.

8.0 Responsibilities

All Staff are responsible for:

- Complying with equalities legislation and College schemes, policies, procedures, and systems.
- Informing themselves of the College's statutory duties regarding equality legislation and to inform themselves of the content and implications of the Equality Scheme and to put the Scheme into practice.
- Adhering to the College's equality and diversity schemes, policies, procedures, and systems.
- Ensuring that equality and diversity is promoted to learners at all appropriate times including through induction, tutorials and classroom practice.
- Promoting equality and diversity and challenging prejudiced and discriminatory behaviour and language by students, work placement providers, outside contractors or other members of staff whenever practicable.
- Attending mandatory training in equality and diversity and keeping up to date with equalities legislation by attending training events and taking note of related information organised and disseminated by the College.

All managers are also responsible for:

- Complying with equalities legislation and College schemes, policies, procedures, and systems.
- Ensuring that equality and diversity is promoted to learners through induction, tutorials, and classroom practice, including acceptable and unacceptable behaviours.
- Ensuring that staff recruitment is completed without prejudice, conscious or unconscious and ensuring we are adhering to our status of being a disability confident employer

Executive – The Executive Team are responsible for:

- Ensuring the College's Strategic Framework includes a commitment to and promotes equality and diversity.
- Creating and leading a positive, inclusive culture in the College that promotes equality, diversity, and challenges prejudiced and discriminatory behaviour by learners, staff (including agency workers, sub-contractors, and volunteers) and others working with or accessing College services.
- Ensuring the College is compliant with equalities legislation and has effective equalities schemes, policies, procedures, and systems in place for staff, learners and others accessing College services.
- Ensuring that equalities schemes, policies, procedures, and systems are properly developed, implemented, and monitored within the College.
- Raising awareness of equality and diversity across the College and ensuring mandatory equality and diversity training is planned and provided for all staff and members of the Corporation.
- Raising awareness of equality and diversity within the student population and ensuring students are aware of their responsibilities.

Corporation – Members of the Corporation are responsible for:

- Working towards ensuring Corporation Membership reflects the diversity of the college's local communities and its student population
- Ensuring there is a Strategic Framework that fosters a positive ethos about equality and diversity and the elimination of discrimination and ensuring that the College's Development Plan includes a commitment to equality and diversity.
- Ensuring the College complies with equalities legislation including the general and specific duties.
- Receiving reports on equality and diversity for staff and students so as to inform the carrying out of responsibilities and in doing so to be able to challenge the Principal and others as and when appropriate
- Ensuring they are aware of the Corporation's statutory responsibilities in relation to equalities legislation as an employer and service provider
- Self-assessing their practice annually with regard to equality and diversity in relation to how the Corporation operates in meeting the statutory and regularity requirements
- Attending Equality and Diversity training as appropriate

Students are responsible for:

- Ensuring they comply with the College's equality policies and behave appropriately towards other students, staff, and members of the College community.
- Ensuring they are aware of their responsibilities to report any incidents of discrimination, harassment, or victimisation either directed at them or that they are witness to

9.0 Collecting, Monitoring and Using Data

Workforce data

- Equalities legislation requires the College to collect and monitor data on a range of workforce activities.
- The HR department is responsible for monitoring a range of employment data by age, gender, ethnicity and disability. Year-on-year comparisons of the College's profile are

analysed as well as comparisons made against the FE Sector nationally, using FE Sector benchmarks.

- Results of monitoring are used to assess the effectiveness of the Equality Scheme and to set targets and action plans for improvement.
- The College's Workforce Profile Report is presented to the Corporation annually and published on the College's website.

Student Data

- The College collects and monitors a range of data on students and applicants to the College. Data is collected for age, gender, ethnicity and disability at application and enrolment.
- It is the responsibility of all managers of the curriculum, to monitor student performance data and in particular success, retention and achievement rates, by age, gender, ethnicity and disability. All curriculum teams participate in self-assessment and set improvement targets in self-assessment action plans.

10. Monitoring and Review

The Equality Scheme will be reviewed annually, following consultation with appropriate groups and through the College's Equality & Diversity Group to ensure continued compliance with equalities legislation and to ensure all College strategies, policies, procedures, systems, and functions remain non-discriminatory.

This Equality Scheme was prepared with regard to the statutory framework, arrangements in place in similar organisations and in consultation with managers. Arrangements will continue to be made for wider and ongoing consultation.

The Policy will be monitored through the College's Equality & Diversity Group which will meet at least on a termly basis. Reports from the group will be taken to the College's Senior Leadership Team (SLT) or others as appropriate.

Further Reading

The following documents have relevance to some topics mentioned within this policy:

- Disciplinary policy and Procedure
- Equality and Diversity Strategy and Action Plan
- Wellbeing Strategy

Appendices

Policy Amendments

Date of Removal	Section	Text Removed	Reason for removal	Removed by
11/09/2023	Introduction	1.1 and avoid discrimination with particular regard to the separate equality duties for disability, gender and race but also includes sexual orientation, religion or belief and age. The Equality Scheme also sets out the actions that the College has taken, or intends to take, in relation to equality.	Over complication, covered elsewhere	Steve Nathan
11/09/2023	College Commitments	<p>and believes that the College will benefit from engaging and including governors, staff and students of all ages from both genders, regardless of racial, ethnic or national backgrounds, sexual orientation and those with different abilities and disabilities.</p> <p>2.3 The College further believes that the diversity of its workforce is a key element in allowing it to meet the needs of a diverse student population within a multicultural society.</p> <p>2.4 The College will treat all employees with respect and dignity, and seeks to provide a positive working environment free from discrimination, harassment or victimisation.</p> <p>2.5 The College will work towards the elimination of discrimination whether overt or covert.</p> <p>2.6 The College will also seek to eliminate harassment and promote equality of opportunity for staff and students who intend to undergo, are undergoing or have undergone gender reassignment.</p> <p>2.7 The College will seek to ensure that staff have equal access to opportunities for training and promotion, to facilities and to resources.</p> <p>2.8 As part of the normal process of consultation the College will consult with all staff about their experience of the working environment. This will include individuals and groups who may have a particular experience of discrimination in the work place.</p> <p>2.9 The College will seek not only to eliminate discrimination, but also to create a working environment based on good relations between women and men of all ages, regardless of racial,</p>	Was far too lengthy, repetitive and mostly irrelevant in the context of a policy. College commitments are covered by the EDI Strategy	Steve Nathan

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		<p>ethnic or national back grounds, sexual orientation and those with different abilities and disabilities. To this end, the College undertakes to provide diverse, non-stereotypical images in any material which it produces for students and staff. The aim is to create a positive inclusive ethos where issues of discrimination and stereotyping can be discussed openly, with a shared commitment to challenging and preventing discrimination, to respecting diversity and difference, and to encouraging good relations between different equality groups within the College.</p> <p>2.10 The College will seek to ensure that individuals and communities have equal access to learning programmes, resources and facilities.</p> <p>2.11 The College will ensure that governors, staff, learners and their sponsors (including partners, contractors and work placement providers) are aware of the value placed upon equal opportunity, of our Equality Scheme, of the action needed for its implementation and that action will be taken in the event of any breach of the published arrangements.</p> <p>2.12 The College will ensure that governors and staff have access to comprehensive information, which assists them to plan, implement and monitor actions to carry out their responsibilities under the Equality Scheme and associated policies and procedures.</p>		
11/09/2023	Purpose and Scale	both genders	Phrasing modernised	Steve Nathan
11/09/2023	Equality Act Specific Duties	<p>The College's equality objectives are:</p> <ol style="list-style-type: none"> 2. Recruit and retain a diverse workforce 3. Promote positive attitudes towards equality and diversity 4. Provide courses and services that meet local needs 5. Raise awareness of equality and diversity 6. Monitor complaints, incidents and disciplinaries by equality groups 7. Provide equality of access to learning and services 8. Equality of outcomes for learners 9. Set up a scheme for EIAs on all strategies, policies, procedures, system and functions 	Moved to EDI strategy document	Steve Nathan

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		<p>10. Consult and involve relevant stakeholders (including staff, students, trade union officials) when undertaking impact assessment</p> <p>11. Complete screening and, where relevant, full impact assessment for all policies, procedures, etc</p> <p>12. Results of EIA published</p>		
11/09/2023	Responsibilities	<ul style="list-style-type: none"> • Ensuring there are procedures and systems in place for dealing with and investigating issues of discrimination, harassment and victimisation raised by staff, students or others using or coming into contact with the College SLT/HR Function • Ensuring that the College's publicity materials present appropriate positive and non stereotypical messages and images with regard to equality and diversity Marketing Function • Ensuring that workforce data is collected and analysed as a means of working towards a staff profile that reflects the diversity of the College's local communities and its student population HR/MIS Function • Agreeing and monitoring targets for equality and diversity at School and Department levels, monitoring performance against targets, identifying any risk areas and ensuring improvement actions are put in place HR Function Plus Covered by action plan • Analysing data and monitoring performance against targets for equality and diversity and drafting improvement plans HR Function Plus Covered by action plan • Attending mandatory equality and diversity training Move to all Staff 	Didn't have relevance as covered by single departments, unnecessary for policy document	Steve Nathan
11/09/2023	Consultation and Involvement	<p>In preparing the Equality, Diversity and Inclusion Policy, the College will:</p> <ul style="list-style-type: none"> • Consult employees, unions and other stakeholders as relevant, including involvement of people from a range of ages, from men and women, from those with different religions and beliefs, from BME groups, from those with disabilities and from LGBT (Lesbian, Gay, Bisexual, Transgender) groups • Consult with students through the Students' Union and Student Council • Take into account any relevant information <p>6.2 All College meeting agendas include a standard item on Equality and Diversity where staff can raise issues which contribute to review of the equalities schemes, policies and procedures.</p>	EDI Committee is part of EDI strategy	Steve Nathan

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		<p>6.3 This policy will be published on the College's Intranet and Internet, and staff and stakeholders will be encouraged to comment on the Scheme and participate in further development of the Scheme.</p>		
11/09/2023	Promotion of Positive Attitudes	<p>8.1 College Commitments</p> <p>8.1.1 All Job Descriptions include a standard section on "College Commitments" which include the following requirements for all staff:</p> <ul style="list-style-type: none"> • Be a positive ambassador for the College at all times. • To adhere to the College's policies, procedures and practices regarding the safeguarding of learners, including attendance at training and updating sessions as required and responding appropriately and supportively to any issues associated with safeguarding. • Adhere-to the College policies, codes, procedures and frameworks. • Undertake continuing personal and work related professional and skills development. • Work collaboratively with colleagues across the College as a whole so as to support the achievement of the College goals. • Be a positive role model in terms of supporting and promoting equality & diversity. • Understand and actively support the College's approach to health and safety and, in particular, to take into account the duty of care for others and oneself in all day to day actions. • Challenge unacceptable behaviour (such as, for example, discriminatory language, not wearing College ID, shouting or playing loud music in corridors, spitting or swearing) whilst not putting one's personal safety at undue risk. • Make an active and positive contribution to team meetings, one to one sessions with line managers and the appraisal process <p>8.2 Staff – training and development</p> <p>8.2.1 Training and development for staff and members of the Corporation will form an integral part of the implementation of the Equality Scheme and the effectiveness of training will be monitored and evaluated.</p> <p>8.2.2 The College's staff Induction programme includes mandatory equalities training for all staff. An on-line training programme is also available.</p>	Unnecessary section within a policy and has been covered by EDI strategy	Steve Nathan

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		<p>On-going training and development for staff on equalities will take place.</p> <p>8.2.3 Additional training is provided for managers on recruitment and selection of staff and handling grievance, discipline, etc.</p> <p>8.4 Dealing with discrimination</p> <p>8.4.1 The College seeks to provide a supportive environment for staff and students who make claims of discrimination, harassment or victimisation. Acts of discrimination (direct or indirect), harassment, victimisation or abuse will be treated as a serious disciplinary offence.</p> <p>8.4.2 Staff who feel they are being discriminated against by others members of staff should raise the matter under the Grievance/Harassment procedure, which will, if the accusation is upheld, be treated as a serious disciplinary offence.</p> <p>8.4.3 If, in the course of their work, staff suffer discrimination from members of the public, the College will take appropriate action and provide appropriate support.</p> <p>8.4.4 Any discriminatory offence against staff by students will be dealt with under the student disciplinary procedure.</p> <p>8.4.5 Students who feel they are being discriminated against by other students or staff should raise the matter under the Complaints Procedure, which will, if the accusation is upheld, be treated as a serious disciplinary offence. Support will be provided through the College Counsellors and tutorial system.</p> <p>8.5 Challenging negative views</p> <p>8.5.1 All staff in the College are responsible for challenging prejudiced and discriminatory language and behaviour by students, staff, members of the public, employers, work placement supervisors and others who come into contact with the College.</p> <p>8.5.2 Where a member of staff might have concerns about their own safety when challenging others, they should refer the matter to their line manager who is responsible for ensuring the issue is raised at an appropriate level for an investigation to be conducted.</p> <p>8.5.3 The mandatory staff equalities training covers how staff should respond and challenge unacceptable behaviours in others and how to</p>		

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		<p>refer on if they are concerned about their own safety.</p> <p>8.5.4 Principal's Induction programme for all students (accessible from Moodle VLE for students who are not able to attend) includes explicitly references to the College's policy of zero tolerance of discrimination of any kind.</p> <p>8.5.5 Student Tutorial programme reinforces the zero tolerance policy. Tutorial schemes of work include specific sessions on suitable strategies for dealing with discrimination.</p> <p>8.5.6 Students are issued with a weekly planner on enrolment explicitly identifying acceptable codes of behaviour, including rights and responsibilities. Where there is an issue with discrimination, this is regarded as gross misconduct and is dealt with appropriately.</p>		
11/09/2023	Action Planning	<p>The college will develop an annual action plan in relation to this policy.</p> <p>The Action Plan will be monitored and reviewed by the College's Equalities Working Group.</p>	Action plan forms part of the EDI strategy.	Steve Nathan
11/09/2023	Equality Impact Assessment	<p>10 Equality Impact Assessment (EIA)</p> <p>10.1 There are 2 types of "impact":</p> <ul style="list-style-type: none"> • A negative or adverse impact – an impact that disadvantages one or more groups. • A positive impact on one or more groups and/or relationships between groups. <p>10.2 The Equality Impact Assessment is a systematic tool for identifying the impact, or potential impact (both negative and positive), of the College's strategies, policies, procedures, services and functions on different groups of people, in particular its students or employees. Where a negative impact is identified, action plans will be put in place to mitigate the effects at an early stage and to monitor progress. Any positive impact on promoting equality will be shared internally.</p> <p>10.3 Not all strategies, policies, procedures, services and functions will require a full impact assessment. An initial screening of the strategy, policy, procedure, service or function will be carried out to consider whether a full impact assessment is required.</p> <p>10.4 If the initial screening reveals a negative impact, a full impact assessment will be needed</p>	All reporting forms a part of the EDI strategy which has made this redundant and out of date. This is covered in EDI strategy document.	Steve Nathan

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		<p>10.5 The responsibility for conducting Equality Impact Assessments in the College rests with all College Managers responsible for drafting and implementing the strategies, policies, procedures, services or functions.</p> <p>10.6 Training for Managers on carrying out impact assessment will therefore be provided.</p>		
11/09/2023	Monitoring and review	<p>11.1 The Equality Scheme will be reviewed annually, following consultation with appropriate groups and through the College's Equality & Diversity Group to ensure continued compliance with equalities legislation and to ensure all College strategies, policies, procedures, systems and functions remain non-discriminatory.</p> <p>11.2 This Equality Scheme was prepared with regard to the statutory framework, arrangements in place in similar organisations and in consultation with managers. Arrangements will continue to be made for wider and ongoing consultation.</p> <p>11.3 The Policy will be monitored through the College's Equality & Diversity Group which will meet at least on a half termly basis. Reports from the group will be taken to the College's Senior Leadership Team (SLT) or others as appropriate.</p> <p>11.4 Reports are presented to Corporation on Workforce monitoring and student monitoring through the analysis of the College's Performance Report (CPR).</p>	All monitoring forms a part of the EDI strategy which has made this redundant which is covered in that document.	Steve Nathan