

# Equality and Diversity Policy

## 1. Purpose

1.1 The aim of this policy is to support RHACC in its journey to be an outstanding place to learn and work, where equality and diversity are actively promoted, and where staff and learners feel valued and included.

1.2 This policy enables us to:

- Meet the needs, expectations and preferences of learners, customers and staff
- Promote wider participation in adult learning and enable more adults to benefit from education
- Aid the engagement and retention of staff
- Meet our statutory obligations

## 2. Aims of the Policy

2.1 This policy aims to inform our stakeholders about our objectives and responsibilities for furthering and promoting Equality, Diversity and inclusion at RHACC and how we meet our public sector equality duty as set out in section 149 Equality Act, 2010.

2.2 The equality duty is set out in three parts which we have adopted as our aims:

2.2.1 To have due regard to eliminate discrimination, harassment, victimisation whether direct or indirect, by association or perception, with regard to the protected characteristics:

- Age
- Disability
- Gender reassignment
- Marriage & civil partnership
- Pregnancy & maternity
- Race
- Religion & belief
- Sex
- Sexual orientation

Other aspects of a person's identity, background or circumstances can cause them to experience discrimination, for example a person's socio-economic status, class or background. The College is committed to advancing equality and eliminating discrimination on these and other grounds.

2.2.2. To advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.

2.2.3 To foster good relations between people who share a relevant protected characteristic and persons who do not share it.

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## 3. Scope

- 3.1 This policy applies to our learners, customers, staff, agency staff and those colleagues working for partners that deliver outsourced services of catering, cleaning, childminders and security.
- 3.2 All learners, customers, staff and governors are expected to behave in a manner consistent with this Policy and work to deliver a student, customer and staff experience that reflects the policy, our equality and diversity framework and any targets set as part of the self-assessment process.
- 3.3 Our commitment extends beyond those protected by legislation but does not cover beliefs or practices that are contrary to the spirit of that legislation or where it may result in the discrimination, harassment or victimisation of others.

## 4. Practical Implementation

- 4.1 Implementation of our duties is achieved through:
  - i. a framework of behaviours and service standards that supports our strategic aim to enable more adults to benefit from outstanding learning experiences
  - ii. and by carrying out equality analysis activity and monitoring how we perform by scrutinising data on how different groups of learners and staff achieve at RHACC.

### 4.1.1 The Framework

#### Leaders, Managers and Staff

Leaders, managers and staff will at all times:

- Respect and value difference
- Promote and advance equality and diversity
- Promote an inclusive and supportive environment for learners, customers and staff
- Empower people by treating them fairly and with respect and dignity
- Work to eliminate discrimination, harassment and victimisation
- Implement statutory and other initiatives in support of our equality and diversity aims

#### User Accessibility

We will ensure that sites, facilities and information are, as far as is reasonably practicable:

- Safe and welcoming
- Fit for purpose
- Accessible
- Conducive for learning and working

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## Curriculum accessibility

We will provide a curriculum:

- that is accessible to all who meet any appropriate entry requirements
- that is inclusive and where everyone, particularly those with protected characteristics feel welcome and included
- where the diversity of our community and the student body is reflected, valued and promoted
- where students are appropriately supported
- where reasonable adjustments are put in place as needed to make learning accessible
- where students and other stakeholders are involved in the development of our curriculum that promotes the fundamental British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different backgrounds, faiths and beliefs.
- We will provide focussed and discrete support to enable people who have a disability or learning difficulty, carers and women who have experienced gender related disadvantage access education and professional training and employment in sectors where women are under-represented.

## Student outcomes

We will provide a learning experience:

- That is inclusive and free from discrimination, harassment, victimisation, extremism and radicalisation
- where there are equal opportunities for all based on merit
- where the diverse needs of our students are, where possible, anticipated, understood and integrated into teaching to enhance participation, learning and achievement
- where there is equality of outcomes across diverse groups
- that supports a diverse society, wellbeing and an ageing society.

## Employment experiences

We will provide a workplace:

- that is inclusive and free from discrimination, harassment and victimisation, extremism and radicalisation
- where there are equal opportunities for all based on merit
- where the diverse needs of employees are, where possible, anticipated, understood and actioned
- where the working environment is flexible, fair and supportive
- where the diversity of our workforce is valued
- where staff are appropriately supported to deliver an accessible curriculum and high student participation and performance
- where our processes take account of, celebrate and promote the diversity of our staff body.

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## 4.1.2 ii. Equality Analysis Activity

4.1.2.1 Having *due regard* means consciously thinking about the three main aims of the duty as part of the College’s decision-making process and understanding how RHACC is performing in relation to them.

We do this by conducting equality analysis activity that includes stakeholder feedback, data collection and analysis, and which ensures college functions are analysed along with curriculum areas. This activity is managed by the RHACC Quality team and monitored by the Equality and Diversity Monitoring Group that is chaired by the Principal. Additional scrutiny is provided by the Governing Body, and in particular the Quality and Standards Committee.

Whenever proposals are made or policies, procedures or practices are reviewed we consider the potential equality impacts.

4.1.2.2 Having due regard to *advancing equality of opportunity* includes, for example, the College taking action to continue eliminating achievement gaps through close review of enrolment and achievement information and the holding of managers to account for reducing any achievement gaps in their provision.

4.1.2.3 Having due regard to the need to *foster good relations* will include, for example, ensuring that teachers embed the promotion of Equality and Diversity themes confidently and successfully in lessons, challenge stereotypes and ensure all our students are fully equipped for life and work in a modern society.

4.1.2.4 Equality and diversity is central to all we do and all College students, staff and stakeholders will be made aware of the college’s Equality and Diversity Policy through induction and regular training.

## 5. Monitoring Objectives

5.1 We will set and review objectives on an annual basis through our self-assessment process, reporting them to Governors and sharing them with learners through the Self-Assessment Report and Quality Improvement Plan. We will share them with staff through the Staff Forum. We will review the policy regularly and update it in line with feedback from staff and learners and best practice and legislation changes.

## 6. Breaches of this policy

6.1 Staff and students are expected to work within the letter and spirit of this policy and in support of all aspects of the framework. In line with the provisions of the Equality Act, 2010, the College believes that ‘unacceptable behaviour’ is behaviour that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment for that person. Unacceptable behaviour will not be tolerated by anyone and will be challenged. Any member of staff or student acting in an offensive or discriminatory manner, against the aims of the framework or otherwise breaching this policy or the Learner Code of Conduct or Employee Code of Conduct will be dealt with under our staff or student disciplinary procedures as appropriate.

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- 6.2 If someone observes a member of staff or a student acting in an offensive or discriminatory manner, or otherwise breaching this policy or acting against the aims of the framework they should report this immediately to their line manager, the duty manager or teacher.
- 6.3 If a learner feels that they have been subject to discriminatory treatment, harassment or victimisation they should contact the College Feedback service at [Feedback@rhacc.ac.uk](mailto:Feedback@rhacc.ac.uk) and the matter will be investigated under the RHACC Complaints Policy and procedures.
- 6.4 If a member of staff feels that they have been subject to discriminatory treatment, harassment or victimisation they should contact their line manager in the first instance or the HR team and the matter will be investigated under the Grievance Policy and procedures or the Staff Disciplinary Policy as appropriate.

**Our Equality, Diversity and Inclusion policy and framework should be read in conjunction with:**

- [RHACC Curriculum Strategy and implementation plan](#)
- [Employee Code of Conduct](#)
- [Learner Code of Conduct](#)
- [Safeguarding Policy](#)
- [Learner Engagement Strategy](#)
- [Whistleblowing Policy](#)
- [Staff Disciplinary Policy](#)
- [Learner Disciplinary Policy](#)
- [Complaints Policy](#)
- [Grievance policy](#)

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## Appendix A - Grounds for discrimination, harassment or victimisation

The protected characteristics listed in the Equality Act, 2010 are:

- Age (including age group)
- Disability
- Gender reassignment (undergoing or has undergone)
- Marriage and civil partnership
- Pregnancy and maternity
- Race (includes colour, nationality, ethnic and national origin)
- Religion or belief (including a lack of religion, belief is a religious or philosophical belief)
- Sex
- Sexual orientation (same, opposite and both sexes)

## Appendix B - Definitions

The following definitions are derived from the Equality Act 2010.

### Discrimination

The definition of discrimination is complicated; however, essentially it is treating an individual or group of people less favourably as a result of a protected characteristic (whether actual, perceived or by association) and cannot be shown to be a proportionate means of achieving a legitimate aim. Indirect discrimination occurs if a provision, criterion or practice is applied that is discriminatory in relation to a relevant protected characteristic and it is applied to people who do not share that protected characteristic, it puts a person at a particular disadvantage with those who do share that protected characteristic or it puts a person at a disadvantage that cannot be shown to be a proportionate means of achieving a legitimate aim. Dual discrimination can occur as a result of a combination of two protected characteristics. Note: discrimination may not be intentional, but an unintended consequence of an unrelated action.

### Harassment

Harassment is unwanted conduct related to a relevant protected characteristic that has the purpose or effect of violating dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment. Unwanted conduct of a sexual nature or that is related to gender reassignment or sex may also be harassment if it leads to less favourable treatment as a result of rejection or submission to the conduct. Harassment does not have to be deliberate; it depends on the perception of the person harassed, the circumstances of the case and whether it was reasonable for the conduct to have the effect outlined above. Note: Our procedures do not accept any form of harassment, even if not related to a protected characteristic.

### Victimisation

Victimisation occurs where a person is subject to a detriment as a result of doing a protected act or if there is a belief that they have done a protected act. A protected act is bringing proceedings under the Equality Act, giving evidence or information, doing other things in connection with the Equality Act or making an allegation that another person has contravened the Equality Act.

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# Equality and Diversity Policy

This policy exists to ensure that all students and staff are able to make the progress of which they are able, in an environment, which welcomes and supports them. In order to ensure that we enable this aim, we will monitor college functions via the gathering and analysis of data (see section 8).

## Equality Analysis Activity -Data Monitoring

Data will be gathered annually as part of the College Self-Assessment Process with particular attention paid to the following (this list is not exhaustive):

### Students

- student enrolment
- achievement, retention and success rates
- applications
- admissions
- conversion rates from applications to admissions to enrolment
- cancellation rates
- access to student services
- access to learning support
- access to student enrichment activities
- disciplinary action, fitness to study, complaints and incidents of harassment/ bullying

### Employees

- employee numbers
- demographic profile of staff
- grade and category of staff including full and part-time status
- applications for appointment
- shortlisted candidates
- appointments and promotions
- type of contract (permanent, fixed term)
- employee relations – grievance, disciplinary, harassment, capability
- leavers
- training and staff development opportunities
- requests for flexible working
- return rates from maternity leave and the roles to which staff return
- pay levels
- gender pay gap
- profile of those with dependants and caring responsibilities
- staff attendance and participation in training and continuing professional development, especially that related to Equality and Diversity and Inclusion.

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## Roles and responsibilities

The College has identified the responsibilities of key staff for ensuring that Equality, Diversity and Inclusion priorities are promoted throughout the organisation.

- Principal, Chair of the Equality and Diversity Monitoring Group and provides overall leadership of Equality and Diversity in the College. [Gabrielle.flint@rhacc.ac.uk](mailto:Gabrielle.flint@rhacc.ac.uk)
- The Vice Principal, Teaching and Learning, is responsible for ensuring that the curriculum is accessible, reflects the needs and interests of all learners, appropriately promotes the principles of the policy. [Gaynor.bray@rhacc.ac.uk](mailto:Gaynor.bray@rhacc.ac.uk)
- The Director of Quality and Assessment is responsible for monitoring the performance of different groups of learners and for ensuring that all teachers and learners are inducted and trained in RHACC’s equality duties and framework and that monitoring information is published within the Self-Assessment report annually. [Elizabeth.jarratt@rhacc.ac.uk](mailto:Elizabeth.jarratt@rhacc.ac.uk)
- Human Resources Manager is responsible for monitoring staff performance and for ensuring that all business support staff are inducted and trained in RHACC’s equality duties and framework and that any reported breaches are addressed effectively through grievance or disciplinary procedures. They are also responsible for collation and reporting of EDI management info in the Annual HR Report and for sharing this with the Staff Forum for consultation purposes.
- The Executive Director -Commercial is responsible for ensuring that college sites, facilities are resources are accessible, fit for purpose and support an outstanding learner experience. [Paul.smith@rhacc.ac.uk](mailto:Paul.smith@rhacc.ac.uk)
- The Chair of Quality and Standards Committee of the Governing Body, is responsible for leading governors’ scrutiny of the Equality and Diversity Policy and recommendation of its approval by the Governing Body. Clerk to the Governing Body – Neil Wallbank: [Neil.Wallbank@rhacc.ac.uk](mailto:Neil.Wallbank@rhacc.ac.uk)
- All RHACC staff members are responsible for implementing the Equality, Diversity and Inclusion Policy, for monitoring its impact and for reporting any breaches.

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# Equality and Diversity Policy

## Equality Impact Assessment: Initial Screening (Stage 1)

Name of Policy or Practice: **Equality, Diversity & Inclusion Policy**

Person/ Team/ Department Responsible: **Principal**

Date of Assessment: **15 03 2022**

### Consider the three aims of the public equality duty:

- To eliminate discrimination
- To advance equality of opportunity
- To foster good relations

### Protected Characteristics:

Age, Disability, Gender Reassignment, Race, Religion or Belief, Sex, Sexual Orientation, Marriage & Civil Partnership, Pregnancy & Maternity

<p>Q1) What is the purpose of the policy, decision or practice</p>	<p><b>to support RHACC in its journey to be an outstanding place to learn and work, where equality and diversity are actively promoted, and where staff and learners feel valued and included.</b></p>
<p>Q2) Who is affected by the initiative? Does the initiative make a positive contribution to equality and diversity in the College? Or is it equality neutral i.e. no particular effect on anyone group?</p> <p><b>All stakeholders. The Policy creates a framework for ensuring compliance with equality duties and uses its powers under the Equality Act to make special provision for people who have a disability and complex needs, carers and disadvantaged women.</b></p>	
<p>Q3) Is there the potential for there to be a negative impact on one or more of the Equality groups as a result of this initiative? If so what groups may be effected and why? Or is it equality neutral?</p> <p><b>No negative impact.</b></p>	
<p>Q4) Has anyone complained about the policy or initiative?</p> <p><b>No</b></p>	
<p>Q5) Is the impact of the initiative significant enough to warrant a more detailed assessment? Yes</p> <p><b>No</b></p> <p>If yes please circle priority rating for assessment: High Medium Low</p>	<p>Yes</p> <p><b>No</b></p>

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