

## Equality and Diversity Policy

<b>Policy Reference</b>	EDI-01		
<b>Issue Date</b>	03 October 2023	<b>Review Date</b>	03 October 2026

## Document Control

<b>Owner</b>	Quality Improvement & Exams Manager
<b>Audience</b>	All Moulton College Stakeholders
<b>Confidentiality</b>	Low

## Version Control

Version	Description/Changes	By	Date
1.0	-	-	April 2017
2.0	Full review	Quality	Dec. 2019
3.0	Review	DoS&LS	11 Oct 2021
4.0	Full review addition of Transgender policy	Q&EM	19 Sept 2023

## Approval

Approved By	Meeting Date	Next Review
Corporation Board	19 December 2019	July 2021
Senior Leadership Team	12 October 2021	12 October 2023
Senior Leadership Team	03 October 2023	03 October 2026
Corporation Board		

## Related Policies

Ref.	Policy
EDI-03	Disability Policy
HR-01	Staff recruitment procedures
HR-03	Prevention of Harassment and Bullying policy and procedures
	Recruitment and admissions policy and procedures
HR-07/08	Maternity/ paternity policies
HR-21	Public Interest Disclosure (Whistleblowing) policy
HR-26	Employment related concerns procedures

## Equality Impact Assessment

Equality Impact Assessment
The policy is robust and there is no evidence of unlawful discrimination and all reasonable adjustment opportunities have been considered and will be subject to continuous monitoring and review.

# Equality and Diversity Policy

## Policy Statement

1. Moulton College is committed to the promotion and advancement of equality and diversity for its staff and students.
2. We aim to promote Diversity and ensure Equality of opportunity for all stakeholders in their dealings with Moulton College. We will do this by providing a learning and working environment which values individuals equally and does not disadvantage individuals by discriminating on any grounds including age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex (gender), and sexual orientation.
3. An individual is not obliged to disclose gender reassignment, although they may wish to do so. A person can indicate their gender as the one they live, even if this differs from that recorded on their birth certificate.
4. This policy applies to all staff, students, governors and visitors to the College. It also outlines Moulton College's commitment to supporting those who are intending to undergo, are undergoing or have undergone gender reassignment.
5. The policy aims to ensure that all members of the College community feel equally valued within the organisation and that best practice is shared widely to achieve this goal.
6. For information on the definitions of the protected characteristics listed above please see [www.equalityhumanrights.com](http://www.equalityhumanrights.com) and search for protected characteristics.

## Responsibilities

7. All staff and students - Staff and students are responsible for their own conduct and should ensure that their behaviour does not make any other person feel uncomfortable. Every member of staff and every student have a responsibility to question their own prejudices and assumptions. It is the duty of all staff and students to avoid unfair discriminatory practices, to challenge them in others and to accept personal responsibility for abiding by this policy. Course Managers are responsible for the sensitive handling of information disclosed to them by students in relation to their transgender status or any other protected characteristic. All staff are responsible for ensuring that individuals are respected, valued and not subjected to bullying, harassment or victimisation as a result of their gender identity.
8. The Corporation - The College Governors are responsible for ensuring that all sites within Moulton College comply with the Equality Act 2010. The Corporation members are responsible for setting the policy framework for the College and for monitoring the delivery against the policy.
9. The Principal - The Principal and Chief Executive has the overall responsibility for the operation of the Policy. The Principal is responsible for ensuring the

implementation of Moulton College's Single Equality Scheme Action Plan.

10. Vice Principal of Curriculum – The Vice Principal of Curriculum is responsible for day to day implementation of the Equality and Diversity Policy across the College, as well as the implementation of Moulton College’s Single Equality Scheme Action Plan, including working with Curriculum Directors to agree and monitor equal opportunities student targets and the implementation of strategies which will contribute to equality and diversity for students, for instance, within tutorial programmes and student enrichment.
11. Quality Improvement & Exams Manager - The Quality Improvement & Exams Manager supports the Vice Principal of Curriculum in the implementation of the Equality and Diversity policy across the college, including within tutorial programmes and student enrichment.
12. Equality and Diversity Group - The Equality and Diversity Group is chaired by the Quality Improvement & Exams Manager. Its key responsibilities include:
  - Meet a minimum of once per term and include cross College support and curriculum based roles, including student representation.
  - To draw up, implement and monitor the impact of the Single Equality Scheme Action Plan
  - To contribute to Equality Impact Assessments of College policies, procedures and practices
  - To recommend initiatives for the promotion of equality, diversity and inclusive practice in College life
  - To contribute to the Equality and Diversity Annual Report.
13. Director of Quality & HE - The Director Quality & HE is responsible for providing student data for monitoring purposes, and the monitoring of these through quality assurance processes.
14. Director of Teaching, Learning and Assessment - The Director TLA has the overall responsibility for the embedding of equality and diversity in teaching, learning and assessment, and the monitoring of these through observation processes.
15. Executive Director of Human Resources - The Exec. Director of Human Resources is responsible for monitoring and interpreting employment data. The Director has the overall responsibility for staff development related to Equality and Diversity and is responsible for maintaining links with and providing access to support networks for transgender staff.
16. Director for Student Services - The Director for Student Services is responsible for ensuring that application and enrolment procedures and the student record system enable transgender individuals to identify and use a preferred name where this differs from their legal name.
17. MIS manager - The MIS manager is responsible for ensuring that identified gender and preferred names are used to populate registers, generate ID cards

and appear in other internal documents.

18. Line Managers - Line Managers are responsible for ensuring their staff understand equality and diversity issues and how to report any perceived discrimination or unfair treatment. They also allocate development opportunities for their staff on a fair, objective basis based on individuals' and College needs. In addition, they are responsible for ensuring their part-time staff are not disadvantaged in any way and that complaints of discrimination or offensive behaviour are dealt with promptly. All Managers are responsible for ensuring proactive dialogue about equality opportunities issues and practices with partner organisations, contractors, customers, students and employers providing work experience to students.
19. External Partners - External partners with which the College works must comply with the College's Equality and Diversity Policy and share the College's commitment to equality and diversity. When drawing up agreements or contracts with external partners, the College must ensure that external partners are made aware of the above requirements and must ensure that the external partner has appropriate policies and procedures in place regarding equality and diversity.
20. Visitors, Contractors and Sub-contractors - Visitors, contractors and sub-contractors must comply with Moulton College Equality and Diversity Policy. College staff who meet visitors and/or employ contractors and sub-contractors are responsible for making them aware of the College's Equality and Diversity Policy.

### **Statutory Duties**

21. Moulton College will abide by its current statutory duties for students and staff, in line with its obligations under the Equality Act 2010 and resulting duty to:
  - eliminate discrimination, harassment and victimisation
  - advance equality of opportunity
  - foster good relations between different groups
22. Individuals will be asked to identify their preferred gender identity as part of the enrolment process.
23. Individuals will be clearly advised that legal identity must be evidenced for the purposes of formal examination entry and certificate production and for the ILR student record.

### **Students**

24. Recruitment and admissions. The College will ensure that:
  - Recruitment and publicity materials are designed in a range of formats to ensure they are free from bias and stereotypes, and encourage applicants from all groups in the community.

- applicants for courses are considered on the basis of their ability to meet the entry criteria, as specified in course information.
- applicants are not treated less favourably because of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex (gender) and sexual orientation.
- applicants are interviewed on the basis of their academic ability and/or potential to succeed.
- application and enrolment procedures give students the opportunity to identify any additional learning support available for their needs.
- where assessment(s) form part of the application process for a particular course, all applicants will take the same assessment(s), with adjustments being made for identified additional learning needs.
- new students are made aware of the Equality and Diversity Policy and the behaviour expected of them during induction, through the student handbook and the information published on the Moodle website.
- links with local community groups and relevant organisations are established.

25. Teaching and Learning - The College will ensure that:

- the range, content and delivery of the curriculum reflect the needs of students and the community and promote widening participation
- all aspects of teaching are sensitive to, and promote, equality and diversity, including language used, timetabling, delivery methods, materials, group organisation and activities
- teaching and learning materials and delivery methods avoid stereotypes and bias, and promote the rich cultural diversity of the local community
- resources are available in formats appropriate to the needs of individual students, including the use of specialist equipment where appropriate
- equality and diversity and access for everyone to develop their potential are embedded in the Teaching and Learning Strategy
- there is an ethos and learning environment which is inclusive and enables students to feel comfortable and valued as an individual.

26. Support services and facilities. The College will:

- provide a range of support services and facilities which will enable students with particular physical, social and cultural needs to participate fully in College life, including:
  - tutorial support

- additional support with learning, for example English and maths
  - additional learning support, for example dyslexia, hearing and autistic support specialists
  - financial and welfare advice
  - access to a free 24 hour confidential helpline
  - social, recreational and catering facilities
  - multi-faith and reflection facilities
- ensure that its support services and facilities are publicised to students and potential applicants through recruitment and publicity materials, the College website, and at induction.
- seek to make continuous improvements to physical access to all of its buildings and make reasonable adjustments to ensure that students, staff and visitors with access requirements due to disability are not disadvantaged.
- the Student Support team will maintain links with local transgender support groups and publicise details of these to students.
- residential allocations will be considered individually in line with the residential allocation procedures.
- an individual's transgender status will only be disclosed on a 'need to know' basis and this information will be treated confidentially.
- Transgender individuals are entitled to use toilet and changing facilities allocated to their preferred gender. Gender neutral, accessible facilities are provided on all College sites.
- Assistance Dogs – any student wishing to bring an assistance dog on site must go through the Head of School, this must be flagged at application. Any assistance dogs on site must adhere to the 'Moulton College Dog Policy'.

## Staff

27. Recruitment and selection. The College will:

- Foster an environment which is inclusive and diverse and all contributions are valued
- When a vacancy arises, prepare a person specification identifying the essential and desirable levels of qualifications/training, knowledge/experience and skills/abilities required for the job and welcoming diverse applicants
- Advertise jobs internally and/or externally using inclusive and accessible language to attract applicants who meet the person specification

- Consider applicants on the basis of their suitability for the job and their ability to fulfil the requirements set out in the person specification
  - Shortlisting will focus on qualifications/training, knowledge/experience and skills/abilities and will be performed 'blind' without applicant personal information
  - At least one member of the recruitment panel will be Safer Recruitment trained and, where possible, the panel will have a gender mix.
28. Training and development. The College will:
- identify annually training and development needs through the Development Review and training and development planning processes
  - make available a range of training opportunities to meet these needs
  - include Equality and Diversity training as part of the induction for new staff.
29. Working environment. The College will:
- make reasonable adjustments to premises or working arrangements to ensure that employees are not disadvantaged on the grounds of any protected characteristics.

### **Harassment, victimisation and discrimination**

30. The College will not tolerate harassment, victimisation or discrimination and has procedures in place to deal with such incidents.
31. Students who feel they have been harassed or discriminated against, or otherwise treated unfairly within the scope of this policy, may raise their concerns with their personal tutor in the first instance. Alternatively, they may discuss the issue with Student Support, who will advise and assist them should they wish to pursue the matter through the student grievance or anti-bullying procedures.
32. Staff who feel that they have been unfairly treated within the scope of this policy may raise their concern through the staff grievance procedures.
33. Staff or students whose conduct breaches this policy through discrimination, harassment or victimisation of others will be dealt with through the disciplinary procedure for staff or students, as appropriate.

### **Monitoring**

34. The College monitors the profile of its students and staff by age, gender, disability and ethnicity. Monitoring of the whole student population is undertaken by the College Information Services team and, for staff, by the HR Department.



The outcomes are reported:

- to the College Senior Leadership Team (SLT) (staff and student population) at least on an annual basis
  - to the HR Committee (staff population) twice yearly
  - to the College's Corporation annually.
35. Monitoring at course level is integrated into the self-assessment processes. Course teams and programme areas monitor enrolment, retention, achievement and success data. They evaluate this data in their self-assessment reports and, where there are differences in the data for different groups of people, identify actions to eliminate these differences. These actions are fed into quality improvement plans and monitored regularly.
36. Where an individual has a preferred name that reflects their gender identity but this is different to their legal name, legal identity will be recorded in relation to exam entry, certificate claim and the ILR record. Preferred name will be used for all other internal purposes (ID cards, registers etc.)
37. Where an individual declares that they wish to change their name to reflect their gender identity following enrolment, they must complete a change of learner details form to reflect that change within the student record system. Evidence of a legal name change will be required in order to change the ILR record. A preferred name may be changed by this process, but this will only apply to internal processes (ID cards, registers etc).

### **Equality Impact Assessments**

38. In accordance with the [public-sector equality duty](#) (April 2011), due consideration is given to the potential impact of the College's policies on groups of staff and students.

# Equality Impact Assessment (EIA)

Please complete both sides of this Equality Impact Assessment and ensure that the latest copy of this is recorded as part of the appendices of the specific policy.

<b>Policy Reference and Name</b>	EDI-01 Equality and Diversity Policy
<b>Assessment date</b>	19 September 2023
<b>Completed by</b>	Quality Improvement and Exams Manager
<b>What are the aims of the policy?</b>	The policy aims to promote Diversity and ensure Equality of opportunity for all stakeholders in their dealings with Moulton College. We will do this by providing a learning and working environment which values individuals equally and does not disadvantage individuals by discriminating on any grounds including age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex (gender), and sexual orientation.
<b>Who does the policy affect?</b>	All members of staff, governors, students, prospective students, visitors, volunteers
<b>Who is involved in implementing the policy?</b>	Governors, CEO, SLT, VP Curriculum, DoS&LS, Line Managers
<b>What information is currently available about the impact of this policy and its associated procedures?</b>	Moulton College will abide by its current statutory duties for students and staff, in line with its obligations under the Equality Act 2010 and resulting duty to: <ul style="list-style-type: none"> <li>39. eliminate discrimination, harassment and victimisation</li> <li>40. advance equality of opportunity</li> <li>41. foster good relations between different groups</li> </ul>
<b>Do you need more information to help you make an assessment about the impact of this policy and its associated procedures?</b>	No
<b>Do you have any examples that show how this policy will have a positive impact on any of the equality characteristics listed in the table below?</b>	When responding to individual issues, protected characteristics and other Equality factors will be clearly observed.
<b>Which other policies does this policy link with?</b>	

What consultation has taken place in the development of this policy?	EDI Committee, SLT
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Use the table below to assess the impact of this policy on each of the listed characteristics. Your decision must be evidence based. Sources of evidence might include success rates, achievement gaps, application and enrolment data, student voice, consultation outcomes, recruitment and employment data, customer feedback or complaints, meeting minutes.

Characteristic*	Negative impact? Y / N	Evidence to support your impact assessment decision	Requires further action? Y/N
<b>Race</b>	<b>N</b>	Policy relates to college processes and so no evidence that it will have a negative impact on the treatment of different races	
<b>Disability</b>	<b>N</b>	Policy relates to college processes and so no evidence that it will have a negative impact on the treatment of those with disabilities	
<b>Gender</b>	<b>N</b>	Policy relates to college processes and so no evidence that it will have a negative impact on the treatment of different genders	<b>N</b>
<b>Gender re-assignment</b>	<b>N</b>	Policy relates to college processes and so no evidence that it will have a negative impact on the treatment of those undergoing gender reassignment	<b>N</b>
<b>Age</b>	<b>N</b>	Policy relates to college processes and so no evidence that it will have a negative impact on the treatment of different age groups	<b>N</b>
<b>Sexual orientation</b>	<b>N</b>	Policy relates to college processes and so no evidence that it will have a negative impact on the treatment of those with different sexual orientations	<b>N</b>
<b>Religion / belief</b>	<b>N</b>	Policy relates to college processes and so no evidence that it will have a negative impact on the treatment of those with different beliefs	<b>N</b>
<b>Pregnancy / maternity</b>	<b>N</b>	Policy relates to college processes and so no evidence that it will have a negative impact on the treatment of pregnant women	<b>N</b>
<b>Marriage / civil partnership</b>	<b>N</b>	Policy relates to college processes and so no evidence that it will have a negative impact on the treatment of individuals that are married or in civil partnerships	<b>N</b>
<b>Socio-economic</b>	<b>N</b>	Policy relates to college processes and so no evidence that it will have a negative impact on the treatment of those from different socio-economic groups	<b>N</b>

### Overall EIA judgement

Select	
✓	<b>No change required</b> The assessment is that the policy is/will be robust. There is no evidence of potentially unlawful discrimination and all reasonable opportunities to advance equality and foster good relations have been taken, subject to continuing monitoring and review

	<b><i>Adjust the policy or practice</i></b> This involves taking steps to remove any barriers, to better advance equality and/or to foster good relations. This may involve removing or changing the aspect of the policy that creates any negative or unwanted impact. It may also involve introducing additional measures to reduce or mitigate any potential negative impact
	<b><i>Continue the policy</i></b> This means adopting/continuing with the policy despite the potential for adverse impact. Set out the rationale for this decision, including how the decision is compatible with our legal obligation. Where there is discrimination, but it is considered not to be unlawful – the objective justification must be recorded
	<b><i>Stop the policy</i></b> If there would otherwise be unlawful discrimination or adverse effects that are not justified and cannot be prevented/mitigated