



South Gloucestershire and Stroud College
SGS Diversity, Equity, Inclusion and Belonging Policy

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Please contact the Human Resources Department

Prepared by:	Gavin Murray
Job Title/Role:	Deputy Principal
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Approved by:	SGS Further Education Corporation
Date:	25 January 2024

Diversity, Equity, Inclusion and Belonging Policy

1. Policy Intent

- 1.1. South Gloucestershire and Stroud College recognises that providing equality of opportunity, valuing diversity and promoting a culture of inclusion are vital to our success. We want our Governors, staff and learners to reflect the diversity of the communities that we serve and influence. We aim to be a place where people can be free to be themselves no matter what their identity or background. By creating a working, learning and social environment in which individuals can utilise their skills and talents to the full without fear of prejudice or harassment; we aim to create a culture where everyone can reach their fullest potential.

2. Scope

- 2.1. This policy applies to all current and prospective learners and apprentices; Governors and staff working at the College on a paid or voluntary basis, external examiners, consultants, and visitors or contractors who visit our campuses. It seeks to eliminate discrimination on the basis of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, ethnicity, religion and/or belief, sex or sexual orientation as set out in the Equality Act (2010).

3. Our core commitments

- 3.1. We will comply with legal obligations set out within the Equality Act 2010 and the Equality Act (Specific Duties and Public Authorities) Regulations 2017 in an open and transparent manner.
- 3.2. Through good governance, leadership and management, we will encourage and support our staff and learners to understand, respect and foster a shared sense of cohesion and belonging; in a world where we can be anything, we will always strive to be kind.
- 3.3. We are committed to acting to redress any imbalance arising from gender, ethnicity, disability or other aspects of diversity including monitoring the recruitment and progress of all learners, apprentices, staff and governors, collecting and collating equalities information and data, publishing this as required, and acting on any inequality revealed by the data.

4. Ancillary goals

- 4.1. We will ensure that existing governors, staff, learners and apprentices, as well as applicants to work or study, are treated fairly and judged solely on merit and by reference to their skills and abilities.
- 4.2. We will ensure that the College's campuses and estate are, as far as is reasonably possible, welcoming and accessible to all.
- 4.3. We will work towards achieving a workforce that reflects both the student body and the diversity of local and national communities.

- 4.4. We will seek to increase levels of participation in our learning community of those staff and students that are currently under-represented through appropriate positive action activities.
- 4.5. We will make sure that appropriate and reasonable adjustments are made, to enable disabled staff, governors and learners to overcome barriers in our working, learning, sporting and social environments.
- 4.6. Through our Inclusion Committee, we will ensure that staff, governors and learners are provided with appropriate tools so that they feel confident to discuss issues relating to equality, diversity and inclusion; and, to raise any concerns they may have in a non-judgemental supportive inclusive environment.
- 4.7. Whilst respecting freedom of speech and expression, we will require our learning and teaching materials to take a globalist view; and we will support our staff to challenge, within their discipline, assumptions from the past, regarding racial and civilizational hierarchy. Where practical, we expect teaching materials to include positive, diverse and non-stereotypical content.
- 4.8. We will, through our published materials, marketing campaigns, progression and careers advice and guidance materials; raise awareness and promote equality of opportunity to tackle inequalities of representation by individuals in the different subject disciplines and service sectors that we serve.

5. Our investment in becoming a Totally Inclusive College

- 5.1. We will continue to be an official partner of Bristol Pride© (UK registered charity: 1166817); as a specific Inclusion Sponsor, we will support the movement to ensure that pride events are accessible to all.
- 5.2. We will continue to be an official partner of St. Pauls Carnival (Company number 10611881); supporting their work to promote and celebrate African Caribbean culture and traditions, and to run an accessible and inclusive world-class Carnival and increase economic benefits to the community.
- 5.3. We will continue to engage positively with both the Bristol Equality Network and the South Gloucestershire Equalities Forum.
- 5.4. We will support publicly and peacefully, issues and organisations, where these issues and organisations match our own values and further our mission and drive to being a fully inclusive organisation.
- 5.5. We will launch a staff diversity mentoring scheme where persons with protected characteristics can request a mentor from the College's Senior Leadership Team.
- 5.6. Through the Stakeholder Engagement Plan we will support our learners to elect from their number, Inclusion Representatives who will be empowered to raise concerns regarding issues of equality, diversity and inclusion.

- 5.7. We will nominate and support a member of SGS curriculum staff to join the UK Parliament's Teacher Ambassador Programme, to help develop our learners understanding of Parliament and democracy.
- 5.8. We will work to become a disability committed and disability confident employer.
- 5.9. We will work to become a Carer confident employer.

6. Policy Implementation

- 6.1. This Policy will be implemented through the College's Equality, Diversity and Inclusion Action Plan, which is reviewed and approved annually by the SGS Further Education Corporation. Progress against actions and objectives will also be monitored by the Inclusion Committee and presented annually to the SGS Corporation.
- 6.2. All members of the College community have a responsibility to promote equality, diversity and inclusion. The College's Executive Team has ultimate responsibility for ensuring that this policy is fully implemented.
- 6.3. The Inclusion Committee shall count among its number at least two members of the Executive Team and a total of not less than 40% of all members shall be drawn from the College's Executive, Senior Leadership and Management Teams.

7. Enforcement

- 7.1. The College strives to be an open and safe place where all individuals are welcomed and treated fairly, respectfully and with equal dignity. We will not tolerate discrimination, harassment or victimisation in any form. Deliberate actions in defiance of the College's mission or this policy will result in disciplinary action.

8. Related Policies, Procedures, Charters, Plans, Guidance and Legislation

Note: this list is not intended to be exhaustive or exclusive and all College policies, procedures, charters and plans must have regard to the commitments identified in sections 3 and 4 above:

Staff

Absence policy and procedure
 Adoption policy and procedure
 Access and Participation Plan
 Anti-bullying and harassment policy and procedure
 Capability policy and procedure
 Code of Conduct
 Disciplinary policy and procedure

Learners

Absence policy and procedure
 Acceptable facilities usage policy and procedure
 Adoption policy and procedure
 Application, admissions and enrolments policy and procedure
 Anti-bullying and harassment policy and procedure
 Assessment policies and procedure

Grievance policy and procedure	Careers education, information and advice policy and procedure
Home and flexible working policy and procedure	Chaplaincy policy and procedure
Maternity policy and procedure	Counselling service policy and procedure
Paternity policy and procedure	Curriculum strategy
People Strategy	Freedom of Expression Policy
Recruitment policy and procedure	Disciplinary policy and procedure
Redundancy policy and procedure	Fees, charges and refunds policy and procedure
Service recognition policy and procedure	Guidance, Inclusion, support and Transition policy and procedure
Shared Parental leave policy and procedure	Exam access arrangements policy and procedure
Stakeholder engagement and involvement plan	Bursary (including HE) and hardship fund policy
Whistleblowing policy and procedure	Students as partners policy and procedure
	Trips policy
	Work experience and volunteers policy and procedure
	Young carers' policy and procedure.

9. **Impact**

9.1. We will assess the impact of this Policy by monitoring as follows:

- Our HR Department will collect and analyse monitoring data on staff with regard to recruitment, training, promotion and complaints and advise the Inclusion Committee annually, prior to reporting this information to SGS Further Education Corporation.
- The Quality Office will collect and analyse learner monitoring data with regard to recruitment, progression and completion and advise the Inclusion Committee annually, prior to reporting this information to the SGS Further Education Corporation.

9.2. This Policy will be reviewed on an annual basis to ensure that it reflects national and sector best practice and current legislation. We will consult widely through our Inclusion Committee, diversity networks, Trade Unions, the SGS Students' Union and other stakeholders.

10. **Training**

10.1. All Governors, staff and learners are required to take part in annual Equality, Diversity and Inclusion (EDI) training, appropriate to them and their role. New staff are required to take EDI training as part of their induction.

11. **Complaint procedures related to equality, diversity or inclusion**

- 11.1. The College expects all members of its community to treat others equitably, with dignity and respect. Any members of our community who believe they have been discriminated against, harassed or bullied have the right to make a complaint free from victimisation or fear of retaliation.
- 11.2. As outlined in EHRC guidance on freedom of expression, published in February 2019, exposure to course materials that learners might find offensive or unacceptable is unlikely to constitute harassment.
- 11.3. Staff wishing to make a complaint, should normally raise the matter informally, in the first instance with their immediate line manager or alternatively, with the College Human Resources Team, directly.
- 11.4. Learners wishing to make a complaint, should normally raise the matter informally, in the first instance with their tutor or Learning Area Manager; alternatively, learners can raise complaints directly with their campus Inclusion Manager or the Director of Wellbeing and Designated Safeguarding Lead, alternatively learners can contact the Vice Principal for their provision type.
- 11.5. Any member of staff may seek assistance and support from their trade union or the Human Resources Team. Learners may seek advice and support from the College's Wellbeing Team or a representative of the SGS Students' Union.
- 11.6. Making a complaint does not prejudice an individual's right to make use of other procedures, including work and study related policies, anti-bullying policies or grievance procedures. We aim to support and protect anyone who makes a complaint, or who acts as a witness, under these procedures from victimisation or retaliation.

12. Additional information

- 12.1. The College has a well-developed approach to equality and diversity impact assessment, supported by an equality, diversity and inclusion toolkit.
- 12.2. The College is committed to assessing the impact of its policies and procedures to identify and eliminate any adverse impact for individuals sharing a protected characteristic.

13. Definitions

- 13.1. **Direct discrimination:** Less favourable treatment because of a protected characteristic.
- 13.2. **Indirect discrimination:** Applying a provision, criterion or practice equally to everyone within the relevant group including a particular member of staff; the provision, criterion or practice puts, or would put, people who share that protected characteristic at a particular disadvantage when compared with people who do not have that characteristic; the provision, criterion or practice puts, or would put, the employee at a disadvantage; and the employer cannot

show that the provision, criterion or practice is a proportionate means of achieving a legitimate aim.

- 13.3. **Discrimination by Association:** Treating a person less favourably than someone else because of their association with a person who has a protected characteristic.
- 13.4. **Discrimination by Perception:** Treating a disabled person unfavourably because of something connected to their disability unless it is objectively justified.
- 13.5. **Harassment:** Three types of harassment are identified within the Act:
- Unwanted conduct that has the purpose or effect of creating an intimidating, hostile, degrading, humiliating or offensive environment, or violating a person's dignity;
 - Unwanted conduct of a sexual nature;
 - Treating a person less favourably because they have submitted to, or rejected unwanted conduct of a sexual nature or that is related to gender reassignment or sex.
- 13.6. **Sexual misconduct:** Any unwanted conduct of a sexual nature, through any medium, including for example, online.
- Conduct 'of a sexual nature' can cover verbal, non-verbal or physical conduct including unwelcome sexual advances, touching, forms of sexual assault, sexual jokes, displaying pornographic photographs or drawings or sending emails with material of a sexual nature.
- 13.7. **Victimisation:** Treating a person badly or victimising them because they have complained about discrimination, helped someone else complain or have done anything to uphold their own or someone else's equality law rights.
- 13.8. **Hate crime and Hate incident:** People can be victims of prejudice and hate which impact on their daily lives. Many of these incidents go unreported. Due to the damaging effect on their lives, it is important that all such incidents are reported. A hate incident is "any incident which may or may not constitute a criminal offence, which is perceived by the victim or any other person as being motivated by prejudice or hate". A hate crime is any such incident which constitutes a criminal offence. Such incidents are targeted at individuals or groups on the basis of their perceived or real 'difference' and vulnerability, because of their: disability, gender-identity, race, religion or sexual orientation. They can happen anywhere: at College, in the street, in the vicinity of the victim's home, on public transport, social venues, fast-food outlets or against religious buildings.

14. MANDATORY INITIAL IMPACT SCREENING



Completed by:

Gavin Murray	Vice Principal - Performance, Standards & Effectiveness	02/01/2024
I have read the guidance document: Completing a Policy Impact Assessment?		✓
If this policy has been up-dated, please tick to confirm that the initial impact screening has also been reviewed:		✓

EQUALITY AND DIVERSITY IMPACT ASSESSMENT

Characteristic	This policy seeks to:	
Age	Supports staff and learners to recognise that prejudice and discrimination on the grounds of age are unacceptable in an educational establishment	
Disability	Commit to making reasonable adjustments to promote equality of access and opportunity for learners, employees and members of the public with disabilities and/or learning difficulties/disabilities.	
Faith or Belief	Supports staff and learners to recognise and address religious or racial discrimination and incitement to religious hatred	
Gender	Protect staff and learners from sexism in all forms	
Race or Ethnicity	Provide opportunities for the advancement of persons of minority race or ethnicity	
Orientation	Promote understanding and respect of the LGBTQQIAAP community	
Gender reassignment	Work with individuals to ensure appropriate support at identified periods	
Economic disadvantage	Use available resources to identify and address any issues of inequality as a result of social and economic factors. Supporting learners and staff, both academically and pastorally in order for all to be successful	
Rural isolation	Use available resources to identify and address any issues of inequality as a result of rural isolation. Supporting learners and staff, both academically and pastorally in order to access College services and be successful.	
Marriage	Support staff and learners to recognise and challenge discrimination on the basis of marriage	
Pregnancy & maternity	Promote equality of opportunity through a supportive, inclusive environment	
Carers & care leavers	Use available resources to identify and address any issues of inequality as a result of being in care or a care leaver. Supporting learners both academically and pastorally in order to be successful.	
Vulnerable persons	Safeguarding children or vulnerable adults	
Please identify any sections of the policy that specifically seek to maximise opportunities to improve diversity within any of the College's stakeholder groups:	Sections 4, 5 and 6	
Please identify any sections of the policy that specifically seek to improve equality of opportunity within any of the College's stakeholder groups:	Section 5.3 and 5.4	
Is there any possibility that this policy could operate in a discriminatory way?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	If you have ticked yes (red), which characteristic will be most affected? Choose an item.	
If yes please confirm that the Policy has been sent for a full Equality & Diversity Impact Assessment, and note the date:	<input type="checkbox"/>	Click or tap to enter a date.

Note: if the policy does not seek to increase diversity or improve equality you should go back and review it before submitting it for approval.

MAPPING OF FUNDAMENTAL RIGHTS	
Which United Nations Convention on the Rights of the Child (UNCRC), Right does this policy most protect:	Art. 2 Non-discrimination Art. 3 Best interests of the child Art. 6 Life, survival & development Art. 12 Respect for personal views Art. 13 Freedom of expression Art. 14 Freedom of thought, belief & religion Art. 15 Freedom of association Art. 16 Right to privacy Art. 17 Access to information Art. 23 Disability protection Art. 28 Right to education Art. 30 Minority & indigenous groups Art. 31 Right to leisure, play & culture Art. 37 Protection from inhumane treatment Art. 40. Right to justice Art. 42 Right to know your rights
Which Human Right (HRA) does this policy most protect:	Art. 14 Prohibition of discrimination Art. 10 Freedom of expression Art. 9 Freedom of thought, conscience and religion Art. 11 Freedom of assembly and association Art. 12 Right to marry Art. 8 Right to private & family life

DATA PROTECTION & PRIVACY BY DESIGN SCREENING	
Tick to confirm that you have considered any data protection issues as part of the design and implementation of this policy; and, that implementing this policy will <u>not</u> result in the collection, storage or processing of personal data outside of official College systems:	✓
<p>The policy allows for the collection, analysis, monitoring and reporting of equalities related data, including data relating to a person's specific and protected characteristics. (Specifically, section 9). This processing shall be lawful processing as it is necessary for compliance with a legal obligation to which the controller is subject (Section 149, the Public Sector Equality Duty). As section 9 authorises the collection of special category data, the Data Protection Officer has confirmed that it is processing necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law in so far as it is authorised by Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the data subject.</p>	
Tick to indicated that this policy has or requires a Data Privacy Impact Assessment:	✓