Equity, Diversity and Inclusion Policy

Policy number:	ED001	Policy Owner:	Executive Director - Corporate Services
EIA Status:	Compliant	EIA meeting date:	17/07/2025
Approved by:	SLT	**Date approved:**	12 March 2025
	Committee		23 June 2025
	Board		
Review frequency:	Bi-Annually	Next review due:	01/03/2027
External website:	Yes	Status:	Active
Linked policies/ documents	• Dignity at Work Policy • Sexual Harassment Policy (Students) • Disciplinary Procedure • Code of Conduct • Grievance Policy & Procedure • Student Charter • Learner Recruitment and Admissions Policy and Procedures • Learning Support Policy • Complaints Procedure		

Policy Summary

Newbury College and University Centre Newbury are committed to fostering an inclusive, equitable, and diverse environment for all community members, aligned with the Equality Act

2010 and the AOC's Equity, Diversity and Inclusion Charter. The policy outlines responsibilities, prohibited behaviours, procedures, and compliance measures to support equity and prevent discrimination.

Equity, Diversity and Inclusion Policy

1. Policy Statement and Purpose

Newbury College and the University Centre Newbury (UCN) (hereinafter together referred to as the College) strives to foster an inclusive, diverse, and equitable environment for all members of its community. We aim to celebrate diversity and promote fairness and respect for everyone, irrespective of their protected characteristics. Our commitment aligns with the Equality Act 2010 and the Public Sector Equality Duty, supporting a culture where diversity is valued, and unlawful discrimination is actively prevented.

The College has committed to the AOC's Equity, Diversity and Inclusion Charter for further education, we have agreed to combine our expertise and influence to create a more powerful and coordinated approach to address equity, diversity and inclusion in further education in England. We agree that by communicating collectively and working together that we can amplify our impact.

Purpose

This policy serves to:

- Affirm our commitment to developing a culture of equity.
- Support our commitment to the AOC's Equity, Diversity and Inclusion Charter
- Specify the actions and responsibilities required to support equity, diversity and inclusion (EDI).
- Ensure full compliance with the Equality Act 2010, with emphasis on section 149.
- Work to eliminate unlawful discrimination, harassment, victimisation, and any behaviour prohibited by the Act.
- Promote equality of opportunity between those who share a protected characteristic and those who do not.
- Encourage positive relations between individuals with protected characteristics and those without.

Scope

This policy applies to all members of the College community, including students, staff, governors, parents/carers, visitors, volunteers, and community users.

2. Definitions

- **Equality:** Ensuring that every individual has an equal opportunity to make the most of their lives and talents and every individual should be treated with dignity and respect. That's regardless of their background, characteristics, or circumstances.
- **Equity:** Tailoring support to individual needs to foster success.
- **Diversity:** Recognising the range of differences among individuals based on protected characteristics.
- **Inclusion:** Ensuring all individuals feel valued and respected within the college environment.

- **Protected Characteristics:** The Equality Act 2010 protects individuals from unfair treatment based on one or more of nine protected characteristics. The protected characteristics are as follows:
  I. **Age:** Refers to individuals belonging to a specific age or range of ages (e.g., 32-year-olds or 18–30-year-olds).
  II. **Disability:** A person has a disability if they have a physical or mental impairment that has a substantial, long-term adverse effect on their ability to perform everyday tasks.
  III. **Gender Reassignment:** The process of transitioning from one gender to another.
  IV. **Marriage and Civil Partnership:** Marriage includes unions between same-sex couples as well as opposite-sex couples. Civil partnerships also provide legal recognition for same-sex couples, and civil partners must not be treated less favourably than married couples, as per the Equality Act.
  V. **Pregnancy and Maternity:** Pregnancy refers to the condition of expecting a baby. Maternity refers to the period following childbirth, including maternity leave in employment. Protection against maternity discrimination lasts for 26 weeks after childbirth and includes protection for breastfeeding.
  VI. **Race:** Refers to a group of people defined by their race, colour, nationality (including citizenship), or ethnic or national origins.
  VII. **Religion or Belief:** Religion includes established religions, while belief encompasses both religious and philosophical beliefs, including a lack of belief. Generally, a belief must influence one's life choices or actions to qualify as a protected characteristic.
  VIII. **Sex:** Refers to an individual being male or female.
  IX. **Sexual Orientation:** Refers to a person's sexual attraction towards people of the same sex, opposite sex, or both sexes.

3. Responsibilities

All Members of the College Community

The College values of Aspiration, Integrity and Respect support and uphold this policy, all members of the college community are expected to support and implement this policy in their day to day lives.

The Prevent duty also includes encouraging learners to respect other people with particular regard to the protected characteristics. This includes mutual respect and tolerance of those with different faiths and beliefs.

Specific responsibilities are as follows:

Governing Board

- Promote EDI in all Board activities.
- Ensure the College meets legal compliance in relation to the Equality Act 2010
- Attend EDI committee meetings to approve objectives and plans.
- Stay informed on policy changes and complete relevant training.
- Appoint a governor responsible for EDI to help eliminate discrimination and promote equal opportunity.

Principal

- Empower staff to implement the Policy across the College.
- Conduct Equality Impact Assessments for key actions, policies, and changes.
- Promote a culture of equity.
- Ensure all staff understand their responsibilities through training.
- Oversee non-discriminatory practices in recruitment, pay, performance, and development.
- Integrate EDI principles in curriculum development and College policies.
- Take all reports of unfair treatment, discrimination, or harassment seriously.
- Report serious EDI related incidents to the Governing Board via the EDI committee.
- Provide the Governing Board with data to monitor EDI.
- Ensure managers are trained to promote equal opportunities and recognise harassment or discrimination.

Senior Leadership Team (SLT) EDI Lead

- Publish data on college impact across protected characteristics.
- Chair EDI committee meetings to discuss and address EDI issues.
- Set and share objectives to enhance EDI within the College.

College Leadership Team

- Provide all employees with training and development opportunities, encouraging them to reach their full potential.
- Understand the difference between equity and equality in the day-to-day leadership of their teams and resources.
- Address complaints of bullying, harassment, victimisation, and unlawful discrimination among employees, students, and external parties.

All Staff (Teaching and Non-Teaching)

- Support the College's EDI objectives, which are reviewed annually.
- Follow the College's EDI Policy and treat everyone with fairness, dignity, and respect.
- Foster an inclusive workplace environment for all colleagues.
- Use teaching materials that positively represent protected characteristics.
- Consider access needs and digital resource capabilities, such as IT access or visual and hearing accommodations.
- Report any instances of bullying, prejudice, or discrimination.
- Undertake regular training to reflect on biases and strengthen understanding of equity and EDI.

Students

- Follow the College's EDI Policy on College premises, during college events, and while traveling to and from college.
- Treat all members of the College community with fairness, respect, and equity.
- Avoid discriminatory actions against any community member.
- Report any incidents of bullying, prejudice, or discrimination to staff immediately.

Prohibited Behaviour under the Equality Act

Harassment or discrimination based on any protected characteristic is strictly prohibited within the College. All members of the College community are encouraged to report any discriminatory incidents.

Examples of Prohibited Discriminatory Behaviour:

- **Physical Assault:** Targeting an individual or group based on colour, ethnicity, nationality, disability, sexual orientation, gender reassignment, or gender.
- **Derogatory Language:** Using offensive names, insults, or jokes.
- **Discriminatory Graffiti:** Displaying or creating racist, sexist, homophobic, or other discriminatory graffiti.
- **Provocative Actions:** Wearing badges, insignia, or clothing that promotes racism, sexism, homophobia, or discrimination.
- **Discriminatory Material:** Bringing offensive or discriminatory materials onto College premises.
- **Verbal Abuse and Threats:** Engaging in threatening language or behaviour towards others based on protected characteristics.
- **Incitement to Discriminate or Bully:** Encouraging others to discriminate or bully individuals because of race, disability, gender, sexual orientation, or gender reassignment.
- **Discriminatory Remarks:** Making offensive comments during discussions.
- **Recruitment to Discriminatory Groups**: Attempting to involve others in discriminatory organisations or groups.
- **Ridicule of Differences:** Mocking someone's differences, such as food choices, music, religion, or dress.
- **Refusal to Co-operate:** Refusing to work or interact with others due to race, gender, disability, sexual orientation, or gender reassignment.

This list represents unacceptable behaviours and is not exhaustive. The College is committed to creating a safe and respectful environment for everyone, and any violations will be addressed in line with college policies.

4. Procedures

Our commitment to student success

- We strive to support every student in achieving their full potential. To accomplish this, we will:
- Utilise contextual data to enhance our support for individual students and specific groups.
- Monitor achievement data by ethnicity, gender, and disability to address any disparities.
- Factor in the achievement of all students when planning future learning and setting ambitious targets.
- Use materials that reflect the diversity of the College, the local community, and the global population, avoiding stereotypes.
- Educate on diversity, the impact of stereotyping, and the effects of prejudice and discrimination through tutorials and organised College events.

- Promote attitudes and values that value equity, challenge prejudice, including racism and other forms of discrimination through our work around the College Values and British values.
- Create opportunities for students to appreciate their own cultures and celebrate the diversity of others.
- Highlight the contributions of different cultures to world history and promote positive representations of diverse communities.
- Foster awareness and appreciation for equity, equality and diversity through displays and updates, the College VLE (TEAMS), visitors, trips, and events such as Mental Health Awareness Week and Black History Month.
- Engage stakeholders to support and advance the College's commitment to EDI.
- Ensure that teaching practices and approaches are inclusive, age-appropriate, and reflective of our entire College community.

Commitment to a respectful and inclusive workplace

The College is dedicated to cultivating a workplace free from bullying, harassment, victimisation, and unlawful discrimination. We aim to uphold dignity and respect for all, recognising and valuing individual differences and the contributions of all staff. To achieve this, we will:

- Implement recruitment practices that promote a diverse and inclusive workforce.
- Provide appropriate training for all roles to foster an inclusive culture.
- Annually review workforce data to monitor and enhance our EDI practices.

These procedures ensure the active implementation of the College's EDI policy, aligning with our commitment to student success and a respectful, inclusive workplace. They support transparency, fairness, and compliance with the Equality Act 2010.

4.1 Equality Impact Assessments (EIAs)

- Initiate EIAs: Conduct Equality Impact Assessments on all new and updated policies, procedures, and strategic initiatives to evaluate their impact on protected characteristics.
- Review Findings: Document EIA results and address any identified issues to prevent discrimination or bias.
- Approval Process: Submit completed EIAs to the Senior Leadership Team (SLT) for review and necessary action.

4.2 Recruitment and Selection

- Inclusive Recruitment: Ensure job descriptions, advertisements, and recruitment processes are inclusive and free from indirect discrimination.
- Diverse Shortlisting Panels: Assemble diverse interview and selection panels to uphold fairness and equity in recruitment.
- Annual Workforce Review: Regularly review workforce diversity data to ensure representation across all protected characteristics.

4.3 Staff Training and Development

- Mandatory Training: Provide all staff with mandatory EDI training during induction, with refresher training delivered regularly.
- Role-Specific Training: Offer additional EDI training tailored to specific roles, such as management and public-facing positions, to prevent discrimination and promote inclusivity.

4.4 Monitoring and Reporting of Incidents

- Reporting Mechanism: Establish clear and accessible channels for reporting incidents related to discrimination, harassment, or victimisation.
- Investigation Process: Conduct a prompt, impartial investigation of reported incidents in accordance with the College's Disciplinary and Grievance Procedures.
- Support for Affected Individuals: Offer appropriate support, such as counselling or mediation services, for those impacted by reported incidents.

4.5 Inclusive Curriculum and Student Engagement

- Curriculum Review: Incorporate reviews of teaching materials and methods to ensure inclusivity and the representation of diverse perspectives in the curriculum.
- Our work around British values includes teaching students about democracy, the rule of law and individual liberty.
- Student Voice: Involve students in EDI discussions through forums, surveys, and feedback to the EDI committee.
- Organised Events: Coordinate College-wide events, such as Black History Month and Mental Health Awareness Week, to foster awareness and celebrate diversity.
- Student Engagement: Provide ongoing support and opportunities to support with mental health.

4.6 Stakeholder Involvement and Communication

- Community Engagement: Collaborate with community partners and stakeholders to support EDI initiatives and promote an inclusive environment.
- Transparent Communication: Publish the EDI Annual Report and EDI objectives on the College website, ensuring they are accessible to all stakeholders.

5. Compliance and Enforcement

To demonstrate compliance with the Equality Act, the College will:

- Publish Impact Information: Produce an annual report from the SLT EDI Lead summarising the College's impact on protected characteristics.
- Conduct Termly EDI Meetings: Hold EDI committee meetings to address and act on EDI-related issues.
- Set and Publish EDI Objectives: Develop and share objectives to enhance equity, included in the annual EDI report.
- Publish an annual Gender Pay Gap Report

To monitor and promote progress in EDI, the SLT and Governing Body will:

- Conduct EIAs on policies, practices, and procedures.

- Regularly review and update the EDI Policy in line with legislation and identified improvements.
- Annually review EDI metrics and objectives, publishing updates.
- Track and analyse data on student achievements, attendance, and participation by protected characteristics, using insights to shape strategies.
- Ensure non-discriminatory recruitment processes and monitor admissions, behaviour, and exclusion policies to prevent disadvantage for minority groups.
- Monitor community access to college services, addressing barriers where identified.
- Monitor workplace access to employees, addressing barriers where identified.
- Perform workforce profiling to track diversity within staff and student demographics.
- Make information available in alternative formats and languages and hold meetings in accessible buildings and at suitable times.

Regular EDI Monitoring: EDI objectives are tracked through:

- The annual report to the Governors
- Termly EDI Committee Meetings
- Workforce and student data analysis
- The EDI Report and Action Plan

Published EDI Information (available on the College website):

- EDI Annual Report
- Gender Pay Gap Report
- EDI Policy
- OFS Transparency Information
- Accessibility Statement

6. References
- [Equality Act 2010](#)
- [Equality Act Codes of Practice](#)
- [SEND Code of Practice: 0 to 25 years](#)
- [Prevent duty guidance: England and Wales (2023) - GOV.UK](#)
- [AOC's Equity, Diversity and Inclusion Charter](#)

7. Supporting Documents
- EIA Procedure
- EIA Form
- Prohibited behaviour under the Equality Act 2010
- Principal's message of commitment to the EDI Policy
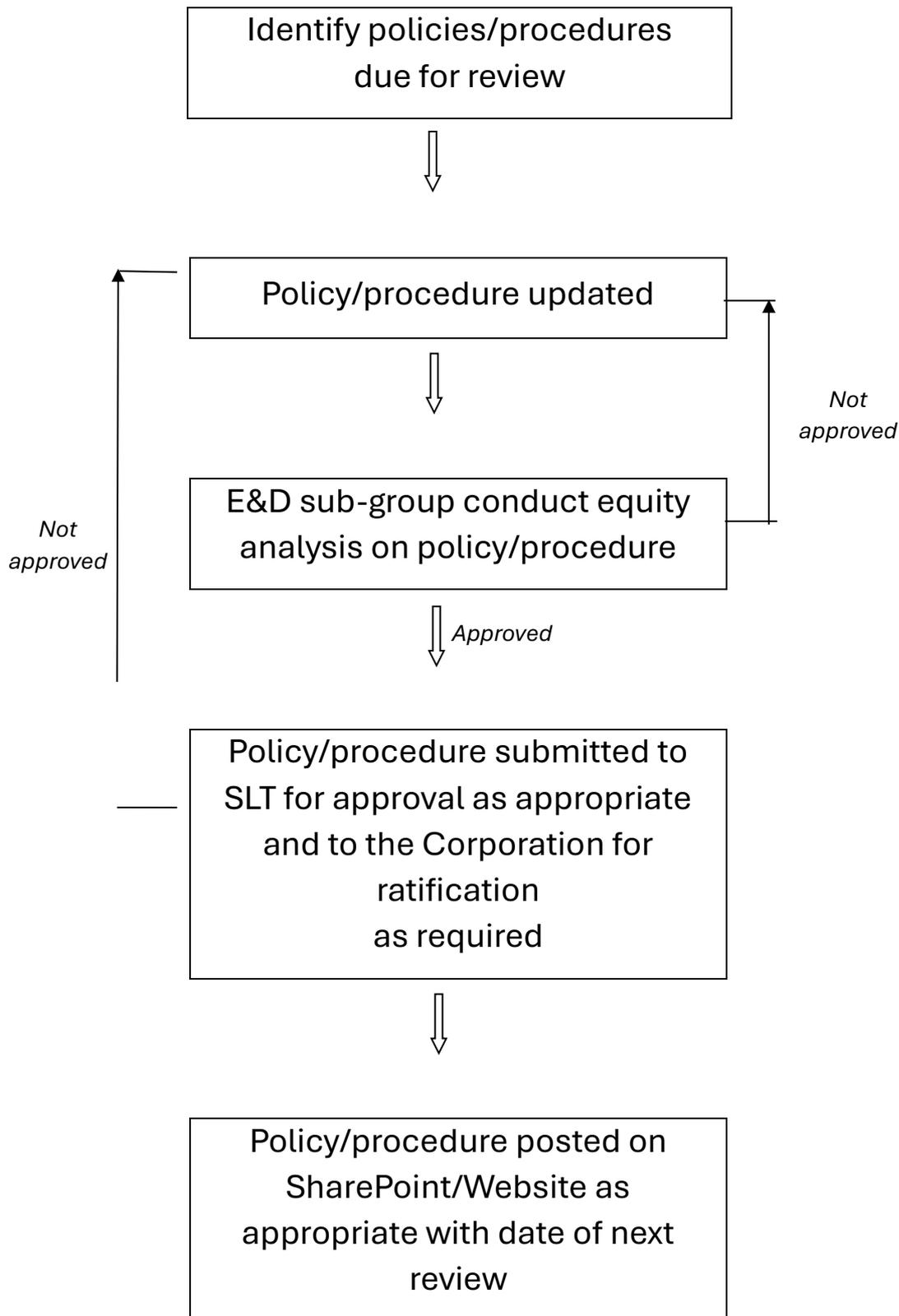
8. Review and Monitoring

This policy will be reviewed every three years to ensure its effectiveness and compliance with relevant legislation.

Reviewed: [Previous review dates]

Next review date due: December 2027

Appendix A: Procedure for Equity Impact Analysis

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┌─────────────────────────────────┐
│   Identify policies/procedures   │
│          due for review          │
└─────────────────────────────────┘
                 ⇓
┌─────────────────────────────────┐
│      Policy/procedure updated    │ ──┐
└─────────────────────────────────┘   │
                 ⇓                      │ Not
┌─────────────────────────────────┐   │ approved
│   E&D sub-group conduct equity   │ ──┘
│    analysis on policy/procedure  │
└─────────────────────────────────┘
                 ⇓ Approved
┌─────────────────────────────────┐
│   Policy/procedure submitted to  │
│   SLT for approval as appropriate│
│      and to the Corporation for  │
│             ratification         │
│            as required           │
└─────────────────────────────────┘
                 ⇓
┌─────────────────────────────────┐
│    Policy/procedure posted on    │
│     SharePoint/Website as        │
│   appropriate with date of next  │
│             review               │
└─────────────────────────────────┘
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Not approved

Not approved

Approved

Appendix B

Information

The EIA ensures that published materials and services provided by the College meet the requirements of the [Equality Act 2010](#) and [Children's Code 2021](#). Before you complete the EIA you must read the guidance notes and complete any required training.

Material to be assessed	
Name	Click or tap here to enter text.
Type	Choose an item.
Aim or purpose	
Person responsible (Job role, not name of person)	

Details of assessment	
Names of those involved	
Date	Click or tap to enter a date.
Outcome	Choose an item.

Considerations

- What kind of impact might this material/service/content have on different groups of people?
- Is there opportunity to eliminate or reduce disadvantage or discrimination against a particular group?
- Is there opportunity to further promote equality for a particular group?

Protected characteristics

Is there anything in this material that is likely to present an issue to any of the protected characteristics listed below? (See guidance notes)

	Y/N	Comments
Age		
Disability		
Gender		
Marriage and civil partnership		
Pregnancy and maternity		
Race / Ethnicity		
Religion or belief		
Sex		
Sexual orientation		

Note: The impact assessment process is not an end in itself – the purpose is to achieve real and practical improvements for different groups of people.

Age-appropriate design code principles

Is there anything in this material that is likely to present an issue to any of the age-appropriate design code principles listed below? (See guidance notes)

	Y/N	Comments
Best interests of the student		
Data protection		
Age-appropriate application		
Transparency		
Detrimental use of data		
Policies and community standards		
Data minimisation		
Data sharing		
Nudge techniques		
Online tools		

Guidance notes:

Protected characteristics

Age

This refers to a person belonging to a particular age (e.g. 50-year-old) or range of ages (e.g. 16–18-year-olds). Age includes treating someone less favourably for reasons relating to their age (whether young or old).

Disability

A person has a disability if they a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities.

Gender (also see Sex)

Gender relates to behaviours and attributes based on labels of masculinity and femininity. An individual may see themselves as a man, a woman, as having no gender, or as having a non-binary gender. The gender category someone identifies with may not match the sex they were assigned at birth.

Marriage and civil partnership

Marriage can be defined as a formal union between two people (same-sex or different-sex persons) as recognised by law. Civil partners must be treated the same as married couples on a wide range of legal matters. Pregnancy and maternity

Pregnancy is the condition of being pregnant or expecting a baby. Maternity

refers to the period after the birth and is linked to maternity leave in the employment context. Protection against maternity discrimination is for 26 weeks after giving birth. This includes treating a woman unfavourably because she is breastfeeding.

Race / Ethnicity

Race refers to a group of people defined by their race, colour and nationality (including citizenship) ethnic or national origins.

Religion or belief

Religion has the meaning usually given to it, but belief includes religious convictions and beliefs including philosophical belief and lack of belief. Generally, a belief should affect your life choices or the way you live, for it to

be included in the definition. Sex (also see Gender)

Either of the two main categories (male and female), referring to the biological aspects of an individual as determined by their anatomy, which is produced by their chromosomes, hormones, and their interactions.

Sexual orientation (LGBTQ+)

A person's identity in relation to the gender or genders to which they are sexually attracted.

Age-appropriate design code principles

Best interests of the student

The best interests of both the young person and adult should be a primary consideration when you design and develop materials/services/content. You need to consider the needs of all our students and work out how you can best support these.

Data protection

A DPIA (Data Protection Impact Assessment) should be undertaken where necessary, to assess and mitigate risks to the rights and freedoms of students which arise from any data processing.

Age-appropriate application

Materials/services/content should be appropriate for the age of individual users accessing it. Consider differing ages, capacities and development needs.

Transparency

Information provided to students must be concise, prominent and in clear language suited to their age.

Detrimental use of data

You should not use a student's personal data in ways that have been shown to be harmful to their wellbeing, or go against industry codes of practice, other regulatory provisions, or government advice.

Policies and community standards

Materials/services/content should conform to our own published terms, policies and community standards.

Data minimisation

Only the minimum amount of personal data you need from a student should be collected and retained.

Data sharing

Do not disclose a student's personal data unless you can demonstrate a compelling reason to do so, considering the best interests of the student.

Appendix C

Prohibited behaviour under the Equality Act 2010

The prohibited behaviour falls into these categories:

Discrimination

- direct discrimination
- discrimination arising from disability
- gender reassignment discrimination: cases of absence from work
- pregnancy and maternity discrimination
- indirect discrimination

Adjustments for disabled persons

- a duty to make reasonable adjustments
- a failure to comply with the duty

Harassment

Victimisation

Appendix D

Principal's message of commitment to the Equity Duty Policy and Procedure

Commitment

"We endeavour to meet the needs of our students, employees and all stakeholders, respecting their protected characteristics within the context of education, learning, training and employment".

We aim to

- Help our students prepare for a fair and flexible labour market that draws on the talents of all and builds a strong economy.
- Change culture and attitudes; reduce prejudice, which holds people back from achieving their potential and tackle discrimination, hatred and violence in our college and the community.
- Empower individuals and, where possible, communities by promoting greater participation in education and training.
- Ensure concerted action to embed equality across the College community and contribute to the equality landscape.

We all share a responsibility for upholding the College's values and complying with the Act, as a community we will:

- Oppose all forms of discrimination.
- Agree with staff and students the key features of our culture of respect and ensure that this is promoted and reinforced throughout our college.
- Analyse data to monitor the progress and achievement of all groups of students, identify trends and take positive steps to address any significant gaps in outcomes.
- Monitor the diversity of staff through new starters and the staff mix.
- Face up to the challenge of improving year on year as an organisation and one which listens to and values all its students and staff
- Aspire to excellence and ensure that quality and equity are the responsibility of all of us who learn and work here