



# **Equality, Diversity & Inclusion Policy**

# Equality, Diversity and Inclusion (EDI) Policy

## 1. Introduction

As a Catholic College, Carmel is built on Christian principles and values. Mutual respect is seen as essential in a community where students are encouraged to recognise their responsibilities to self and others, and to the society in which they live. We were pleased that OFSTED during their 2019 inspection recognised the way we continually strive to reconcile our ethos with good equality and diversity practice. OFSTED commented: *Students demonstrate high levels of respect, celebrate individual difference and strive to be the best they can be. Students behave with consistently high levels of respect for others. They play a highly positive role in creating a college environment in which commonalities are identified and celebrated, difference is valued and nurtured, and bullying, harassment and violence are never tolerated. (Ofsted inspection: April 30 - May 3, 2019)*

Carmel College strives to reconcile equality and diversity to secure:

- Equality of access
- Equality of choice
- Equality of outcome
- Equality of process

Valuing diversity refers to demonstrably valuing diverse employees, students and clients/customers by having policies and procedures that take their diverse needs and preferences into account. In the context of equalities, diversity is often taken to mean the differences in the values, attitudes, cultural perspective, beliefs, ethnic background, sexual orientation, gender reassignment, ability or disability, skills, knowledge, age and life experiences of each individual in any group of people. It is not the same as equal opportunities.

## 2. Aims and purpose of this policy

- 2.1 The College seeks to ensure equality of opportunity and treatment for all persons in relation to all of its activities, such as the employment of staff, engagement with volunteers, consultants and contractors, the provision of educational opportunities, and the provision of training and other services to individuals and organisations.
- 2.2 The College recognises the existence of institutionalised discrimination, including institutional racism and is committed to making changes in any area of College practice where there is evidence of failure to provide an appropriate and professional service. It is committed to closing equality gaps in relation to student and trainee outcomes.
- 2.3 The College will work actively towards eliminating discrimination, harassment and bullying because of sex, gender reassignment, marital or civil partnership status, family responsibility, pregnancy, maternity and paternity, ethnicity, race, colour, nationality, class, HIV status, age, religion or belief, disability, or sexual orientation, unrelated criminal convictions, trade union activity or any other irrelevant criteria.
- 2.4 This Policy should be read in conjunction with the College procedures on bullying and harassment (Dignity at Work Policy), which provides detailed guidance on how staff

should support themselves and students complaining of harassment. In the event that staff or students are alleged to be in breach of the College EDI Policy an investigation will be carried out in accordance with agreed procedures, including where appropriate, disciplinary procedures.

2.5 The College operates within a set of agreed EDI definitions, which can be found in the EDI Plan

2.6 The College will work actively to make progress in five key areas:

**2.6.1 Discrimination**

Eliminating any discrimination in relation to staff recruitment and promotion, the purchase of goods and services, and in the content, delivery and management of the curriculum.

**2.6.2 Harassment**

Ensuring that all students, staff and visitors can go about their business in an atmosphere free of intimidation or abuse.

**2.6.3 Widening Participation**

Encouraging maximum access to the full range of courses and other educational services for people of all social backgrounds and cultures. This includes monitoring patterns of recruitment to courses and working to ensure that course recruitment is based solely on student needs and aptitudes.

**2.6.4 Inclusive Learning**

Providing support to enable individual learners of different needs to progress through the curriculum towards successful achievement.

**2.6.5 Celebrating Diversity**

Recognising and reflecting the positive contributions of men and women of different social backgrounds, cultures, religions, abilities, ages and sexual orientation.

2.7 The College will actively promote staff training and development in EDI for all employees.

2.8 The College will monitor and review the curriculum, and the learning resources used to deliver the curriculum, to ensure that they reflect and promote equality and diversity.

2.9 The College will develop partnerships with organisations and groups in Carmel and beyond to help develop equality and diversity and positive action projects for the benefit of the wider community.

2.10 The College will ensure that marketing strategies reflect EDI good practice, and that College provision is actively and appropriately promoted to all sections of the community.

2.11 The College will review the effectiveness of procedures, such as the Dignity at Work Policy, designed to enable students, staff or clients to raise issues of concern about EDI, and to make complaints about discrimination, harassment or bullying.

2.12 College must take reasonable steps to be proactive in prevention of sexual harassment of employees in line with the Worker Protection Act 2023 which will come into force on 26 October 2024.

2.13 The College will ensure that its EDI Policy is publicised as widely as possible to its community, including students, staff, contractors, consultants, clients and members of partner organisations.

In pursuing progress in these five key areas listed, the College is fully committed to paying due regard to the general equality duty in the Equality Act 2010. We will therefore ensure that all our policies, procedures and practices have due regard to the need to:

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

### **3. Accountability**

#### **Rights & Responsibilities**

The translation of this policy into practice is the responsibility of everyone in college and any external stakeholders, contractors or others with whom we engage.

3.1 The College governors are responsible for promoting equality, diversity and inclusion on behalf of the Corporation. They are also responsible for ensuring that effective policies and procedures are in place to continuously improve the quality of equality and diversity throughout the College.

The College Governing Body carries the ultimate responsibility, under the law, for ensuring that our College meets the requirements of equality legislation.

In particular governors will:

- Set and maintain the strategic direction for equality and diversity.
- Monitor performance and targets through regular report.
- Participate fully in all appropriate training and briefing activities related to equality laws and diversity issues.
- Observe fully the standards and expectations set out throughout this and related policy documents.

There is a procedure in place to ensure that governors are updated on the content and outcome of specific Equality Impact Assessments (EIAs) conducted between their meetings, giving them the further opportunity to call in the author(s) for clarification and discussion before formal endorsement by them. The College has a Link ED&I Governor

with a specific role description set out.

- 3.2 The Equality, Diversity and Inclusion Managers (Assistant Principal – Staffing and Catholic Ethos & the Equality, Diversity and Inclusion coordinator) are responsible for coordinating, monitoring and reviewing the Equality, Diversity and Inclusion Policy and for evaluating its effectiveness.
- 3.3 The role of the Equality, Diversity and Inclusion Committee, and particularly the Equality, Diversity and Inclusion Coordinator, will be to:
  - 3.3.1 Raise the profile of equality assurance issues within Carmel College and ensure that it promotes a culture of equality and inclusivity.
  - 3.3.2 Monitor the implementation of the Policy.
  - 3.3.3 Inform management and governors of any problems which require addressing and required action at manager or governor level.
  - 3.3.4 Producing and promoting college wide equality tools and resources available for viewing and /or reading.
  - 3.3.5 Annually review the Policy and to make proposals either for modifications to the Policy and / or related issues, in the light of experience or changing legislation.
  - 3.3.6 To inform, guide, train & support staff on equality assurance issues.
  - 3.3.7 Train staff/students as appropriate.
  - 3.3.8 Co-ordinate the College EIA programme
- 3.4 The Equality, Diversity and Inclusion Managers are responsible for coordinating, reviewing and monitoring the development of Inclusive Learning aspects EDI across the College.

This will be to:

- 3.4.1 Set targets that are realistic in terms of being reasonable, practical and proportionate
  - 3.4.2 Disseminate information to relevant bodies
- 3.5 The Equality, Diversity and Inclusion Committee shall consist of:
    - 3.5.1 Vice Principal
    - 3.5.2 Assistant Principal (Staffing and Catholic Ethos)
    - 3.5.3 The Equality, Diversity and Inclusion Coordinator
    - 3.5.4 The Learning Support Manager
    - 3.5.5 The HR Manager
    - 3.5.6 The Marketing manager
    - 3.5.7 A maximum of four additional staff members
    - 3.5.8 A maximum of six students
    - 3.5.9 The Estates Manager
    - 3.5.10 The College Chaplain
    - 3.5.11 *And invite other appropriate internal and external stakeholders to join the committee*
  - 3.6 This Equality, Diversity and Inclusion Policy must be prominently and regularly communicated.

- 3.7 Details of the Equality, Diversity & Inclusion Committee and members of the senior management responsible for Equality and Diversity will be made public.
- 3.8 The College Human Resources Team is responsible for the implementation of all aspects of the College's Equality, Diversity and Inclusion Policy relating to the employment of staff.
- 3.9 All Managers of the College are responsible for promoting Equality, Diversity and Inclusion, and for improving the EDI performance of the College and relevant area.
- 3.10 All Tutors play a vital role in embedding EDI content within teaching and learning activities as appropriate.
- 3.11 Tutors may be required to undertake some of these roles as part of their brief e.g.:
  - Informing students of the existence of the EDI Policy and its importance to them.
  - Exploring the basic issues of equality with students so that they understand what rights and responsibilities the Policy confers.
  - Developing this in the Tutorial Programme in conjunction with the Quality Assurance Group.
  - Liaising with the Learning Support Team and relevant subject teachers on behalf of particular students. Acting as a point of call, if appropriate, for students who feel aggrieved / disadvantaged.
  - Advising on channels of redress / support for student or referring students to another person who can do this.

#### **4 Staff Responsibilities**

All employees of the College have a responsibility to comply with the EDI Policy and should promote equality and diversity in all aspects of their work:

- 4.1 All staff must familiarise themselves with the EDI policy and procedures.
- 4.2 All staff must promote the Policy's aims in terms of working relationships developed i.e. based on respect for people's identity.
- 4.3 All staff must challenge breaches of the Policy in accordance with College guidelines.
- 4.4 Students who need extra support should have their needs recognised by teachers. This can take various forms and includes:
  - Seeking the additional support of the Learning Support Team
  - Informing student of learning support materials available in the Library.
  - Seeking suitable adapted learning aids i.e. for the hearing and visually impaired.
  - Identifying problems as soon as possible to the appropriate service.

- 4.5 Classroom management should promote respectful harmonious relationships between students. Staff should challenge any incident / statements made in class in an appropriate way and if necessary refer the matter to the disciplinary process and, if appropriate, to a Senior Manager.
- 4.6 A similar responsibility for maintaining acceptable standards of behaviour applies outside the classroom for example in corridors, communal areas, or other areas in the college
- 4.7 Any breach of this policy by a member of staff will/can be dealt with in accordance with the disciplinary/grievance procedures.
- 4.8 Volunteers looking for workplace experiences contribute significantly to the diversity of the College. They can expect to be treated fairly, with dignity and respect, and without discrimination. They are likewise expected to treat others fairly, with dignity and respect, and without discrimination. Due to the restrictions imposed by employment law, volunteers are not entitled to the same rights and protections as employees. We will endeavour, however, to provide a good working environment including full training in the provisions of this and appropriate related policies.

## **5 Student Responsibilities**

Students are expected to treat all members of the College community with respect. They must contribute to a respectful harmonious learning environment. They must support and promote the College Student EDI guidelines.

Any breach of this policy by a student will/can be dealt with in accordance with the disciplinary/complaints procedures.

## **6 Period of Review**

The policy will be reviewed annually. Policy reviews will always be conducted using our existing and agreed consultative machinery for staff, students and stakeholders. The actions set out in our Single Equality Scheme also have their own time frames and will be automatically reviewed on the due date(s) listed. Any such actions completed within the Single Equality Scheme will be further reviewed against the prevailing content of this policy to determine if any “knock on” changes need to be made to appropriate clauses within this document.

## **7 Equality, Diversity and Inclusion Performance Indicators**

### **Students**

Achievement rates by ethnicity, sex and disability to be no worse than College average.

Retention rates by ethnicity, sex and disability to be no worse than College average.

Attendance rates by ethnicity, sex and disability to be no worse than College average.

Enrolment by ethnicity, sex and disability to broadly reflect College and / or course catchment area.

## **Staff**

Staff profile by ethnicity, sex and disability to broadly reflect the area across which the College recruits and the College population:

- % of teaching staff on management range by sex / race /disability / age
- % of support staff by grading – by sex / race / disability /age
- % of staff by employment type (established / temporary / supply) by – sex / race / disability / age
- Analysis of staff climate questionnaire data.
- % of applicants, staff short listed and staff appointed to both internal and external job vacancies by – sex / race / disability /age

The responsibility to collate and report on the monitoring of EDI Policy will lie with the EDI Committee.

Results of monitoring will be used to assess the effectiveness of the EDI Policy and to rethink, and set targets in, relevant Development Plans.

It is the responsibility of all line managers to be aware of the monitoring data available for their area / subject and act on it accordingly.

Publication of the data involved in the monitoring of the EDI Policy will take place annually.

Full copies will be given to the following:

- Senior Manager with overall responsibility for EDI
- All staff and student members of the EDI committee.
- Summary reports will be made available on the College Intranet site, which is accessible to all staff and students.

## **8 Procedure for dealing with breach of the Equality, Diversity & Inclusion Policy**

Grievances will be taken seriously, and the responses must be confidential (as far as possible) and effective. There are two strands for the resolution of problems, one formal, the other informal.

Both of these are outlined in the College's Grievance Procedure for Staff (available from the HR Department or the College Intranet Site)

The informal and formal strand for students can be accessed through the Student Complaints Procedure. Details of how to register a complaint can be found in the Student Diary.



Proved incidents of breaches of the EDI Policy must be recorded and monitored by the Principal and Equality and Diversity Coordinator.

The on-going responsibility for monitoring that no future breach of the Policy occurs lies with the person dealing with the grievance procedure as well as senior leadership.

Appropriate reports about proven breaches of the policy and/or related policies, together with details of subsequent action taken will be made to the Governing Body and the EDI Committee.

## **9 Related Procedures and Associated Documentation**

- College EDI definitions
- Strategic plan
- Communication Strategy
- Dignity at Work Policy (Appendix)
- Annual EDI Plan
- Staff Recruitment Policy
- Staff Development and Training Plan
- The Marketing Policy
- The Student Discipline Policy
- Discipline / Grievance policies
- Health and Safety Policy
- College IT Policy
- Data Protection policy

All the above are available from the College Intranet.

## **10 Authority**

This policy reflects UK legislation as at 2023 including the provisions from those European Directives and European Court of Justice (ECJ) authorities which have been accepted by the UK Parliament, post the Brexit Agreement of 2020, and are now incorporated into UK law, including but not limited to:

- The Equality Act 2010
- Relevant Statutory Codes from the Equality and Human Rights Commission
- ACAS Codes and Guidance
- The Human Rights Act 1996
- The Employment Rights Act 1996
- The Public Sector Equality Duty
- Equal Pay Act
- UK General Data Protection regulation (GDPR)
- Privacy, Electronic Communications Regulation (PECR)
- On-line Safety Act
- Protection from Harassment Act

As a responsible employer the College will ensure that all staff receive appropriate training on their rights and responsibilities in relation to Equality and Diversity legislation and the College's Equality, Diversity and Inclusion policies and procedures.

Carmel College welcome applications from students of all faiths and none. It also welcomes staff from all faiths though there are certain posts, which, because of their nature – seniority or teaching subject are only, open to Catholic applicants.

|                                      |   |                          |                               |   |
|--------------------------------------|---|--------------------------|-------------------------------|---|
| <b>Intranet Path</b>                 | CONNECT>>DEPARTMENTS>>COLLEGE POLICIES>>PERFORMANCE MANAGEMENT POLICY |                          |                               |   |
| <b>Circulation List</b>              | Principalship   | <input type="checkbox"/> | College Union Representatives | ✓ |
|                                      | Full Governing Body   | <input type="checkbox"/> | HR Department                 | ✓ |
| <b>Author / Responsibility</b>       | EDI Co-ordinator<br>Assistant Principal Staffing and Catholic Ethos   |                          |                               |   |
| <b>Reviewed by:</b>                  | Quality and Standards Committee                                       |                          |                               |   |
| <b>Approved by:</b>                  | Full Governing Body   |                          |                               |   |
| <b>Date of last Policy approval:</b> | March 2024  |                          |                               |   |
| <b>Review interval:</b>              | Annual  |                          |                               |   |
| <b>Date next review due:</b>         | March 2025  |                          |                               |   |

## Equality Impact Assessment

| Question   | Response   |
|--|--|
| <b>1. Name of policy being assessed</b>  | EDI Policy   |
| <b>2. Summary of aims and objectives of the policy</b>   | 10.1 The policy outlines the procedures to ensure equality of opportunity and treatment for all persons in relation to all of its activities, such as the employment of staff, engagement with volunteers, consultants and contractors, the provision of educational opportunities, and the provision of training and other services to individuals and organisations. |
| <b>3. What involvement and consultation has been done in relation to this policy? (e.g. with relevant groups and stakeholders)</b> | Legal advice.<br>Feedback from SLT.<br>Feedback from the College's Equality and Diversity Manager.   |
| <b>4. Who is affected by the policy?</b>   | Carmel staff / students / parents and carers/ others with an interest in the College   |
| <b>5. What are the arrangements for monitoring and reviewing the actual impact of the policy?</b>                                  | The policy will be reviewed annually.  |

| Protected Characteristic Group | Is there a potential for positive or negative impact? | Please explain and give examples of any evidence/data used   | Action to address negative impact (e.g. adjustment made |
|--------------------------------|---|--|---|
| Disability                     | Positive Impact                                       | The Policy allows all staff/ students / parents / carers and others with an interest in the College to raise concerns about any discrimination detailed in the protected characteristics | N/A   |
| Gender reassignment            | Positive Impact                                       | As explained for disability  |   |
| Marriage or civil partnership  | Positive Impact                                       | As explained for disability  |   |
| Pregnancy and maternity        | Positive Impact                                       | As explained for disability  |   |
| Race                           | Positive Impact                                       | As explained for disability  |   |

|                    |                 |                             |  |
|--------------------|-----------------|-----------------------------|--|
| Religion or belief | Positive Impact | As explained for disability |  |
| Sexual orientation | Positive Impact | As explained for disability |  |
| Sex (gender)       | Positive Impact | As explained for disability |  |
| Age                | Positive Impact | As explained for disability |  |

**Evaluation:**

| Question   | Explanation / justification   |  |
|--|---|--|
| Is it possible the proposed policy could discriminate or unfairly disadvantage people?   | The procedures are applicable to all to follow. There is no perceived discrimination or unfair disadvantage to any individual or group. |  |
| Final Decision:  | Tick the relevant Box   | Include any explanation / justification required   |
| 1. No barriers identified, therefore activity will <b>proceed</b> .  | ✓   | The policy is consistent in the approach to ensure staff are appropriately informed of the procedure |
| 2. You can decide to <b>stop</b> the policy or practice at some point because the data shows bias towards one or more groups   |   |  |
| 3. You can <b>adapt or change</b> the policy in a way which you think will eliminate the bias  |   |  |
| 4. Barriers and impact identified, however having considered all available options carefully, there appear to be no other proportionate ways to achieve the aim of the policy or practice (e.g. in extreme cases or where positive action is taken). Therefore you are going to <b>proceed with caution</b> with this policy or practice knowing that it may favour some people less than others, providing justification for this decision. |   |  |