

SUSSEX DOWNS COLLEGE EQUALITY AND DIVERSITY INCORPORATING RACE EQUALITY POLICY

Purpose of this Policy

- to ensure that no learners, members of staff, visitors or others who come into contact with the college receive less favourable treatment on the grounds of: age, disability, ethnic origin, gender, gender identity, learning difficulty, marital status, mental or physical health status, physical appearance, race, religion, sensory impairment, sexual orientation, skin colour, or socio-economic status.
- to promote equality of opportunity in all aspects of college activity, and to create a culture in which diversity is not merely accepted but celebrated, and the positive contributions made by all learners and staff are recognised.
- to provide appropriate additional support for learners and staff.
- to prevent harassment or bullying taking place, and to ensure that any discriminatory behaviour by any student, staff member or visitor will not be tolerated.
- to provide effective means of redress if any aspect of the policy is infringed.

Scope of the Policy

This Policy covers all aspects of the work of the college. It includes the college's Race Equality Policy. Key areas it covers are:

Learners

- Admissions and Guidance
- Learning Support
- Teaching, learning and curriculum
- Progression, attainment and assessment
- Harassment

Staff

- Recruitment
- Induction
- Training
- Disability
- Grievance
- Harassment

Other Bodies covered by this policy are

- College Corporation
- Franchise partners and sub-contractors
- Employers
- Contractors working on college premises
- Agencies and individuals with whom the college contracts

Publication

The existence of the policy will be made known through a variety of channels including the Student Charter, the Student Handbook, staff and student induction, student tutorial work. The full policy will be available on request from Reception, Learning Centres, Student Services, Tutors or Standards and Development Managers. It will also be on the college intranet. Support in accessing this document can be made available on request. The Policy will be reviewed every two years.

Context

The college Policy is in line with national legislation and guidelines and takes account of other college policies. These are set out in Appendix 2.

Policy Statements

In order to achieve its aims, the college has agreed the following policies. (The “managers” cited in responsibilities may be Heads or Level 4 managers):

1. Admissions and Guidance Equality Policy

The college is committed to widening participation. To achieve this it will:

- i) Develop marketing strategies that reflect Equal Opportunities good practice. (Responsibility – Marketing Managers)
- ii) Actively and appropriately promote provision to all sections of the community, especially under-represented groups. (Responsibility – Marketing Managers, Training Solutions team)
- iii) Design application and enrolment forms that are easy to read and which encourage applicants to state special requirements so that these can be given consideration within the college. (Responsibility – Learning Services and Information Services Managers)
- iv) Train Reception, guidance staff and interviewers in equal opportunities awareness, so that no student is rejected for a course on irrelevant, discriminatory grounds. (Responsibility – Learning Services, Curriculum, Information Services and Employee Development Managers)
- v) Adhere to clear, publicised admissions criteria. (Responsibility – Learning Services, Curriculum and Information Services Managers)

2. Student Support and Access Equality Policy

The college is committed to eliminating barriers to participation and access. To achieve this it will:

- i) Provide an environment which is safe, healthy and welcoming to all users, and in which sub-contractors abide by the college’s equal opportunities policies.

(Responsibility: - Facilities and Standards Managers)
- ii) Provide specialist equipment, personal support and appropriate facilities for students who have a disability or learning difficulty, and work towards providing total physical access. (Responsibility: - Learning Services, Student/Curriculum and Facilities Managers)
- iii) Inform learners of sources of financial support available to them. (Responsibility – Learning Services Managers)
- iv) Identify additional learning needs and agree appropriate additional support. (Responsibility: - Learning Services and Student/Curriculum Managers)
- v) Agree flexibility where possible for students whose mental or physical health makes regular attendance difficult. (Responsibility – Student/Curriculum Managers)

- vi) Provide catering services which acknowledge the diversity of dietary requirements. (Responsibility - Facilities Managers)
- vii) Give active support to students who have caring responsibilities. (Responsibility - Nursery, Student/ Curriculum Managers)
- viii) Not allow its premises to be used by organisations whose aims are explicitly discriminatory. (Responsibility – Principal)
- ix) Ensure that Homestay providers are aware of and abide by college policies (Responsibility: - Student Welfare Managers)

3. Curriculum Equality Policy

The college is committed to inclusive learning. To achieve this it will:

- i) Provide appropriate mainstream and discrete provision for students with learning difficulties and/or mental and physical disabilities. (Responsibility: - Curriculum Managers)
- ii) Design the curriculum offer to take account of prior learning, access, mode of study and progression. (Responsibility - Curriculum Managers)
- iii) Use a variety of teaching, learning and assessment styles that can accommodate a variety of learner preferences. (Responsibility - Course co-ordinators/Curriculum Leaders)
- iv) Use materials/resources which are free of discriminatory stereotypes and sensitive to cultural diversity. (Responsibility - Course co-ordinators/Curriculum Leaders)
- v) Monitor work-placements and work-based learning to ensure that they provide learners with equal opportunities to benefit from the learning experience. (Responsibility - Curriculum and “Training Solutions” Managers)
- vi) Provide careers education information which does not reinforce stereotypes and challenges assumptions about work roles. (Responsibility - Learning Services and Student/Curriculum Managers and Course co-ordinators)

4. Employment Equality Policy

The college is committed to using employment procedures that are informed by equal opportunities criteria. To achieve this it will:

- i) Provide training for line managers in the recruitment and training of staff (Responsibility - Employee Development Managers)
- ii) Use clear, transparent, non-discriminatory criteria in selection procedures (Responsibility - Interview Panel Chairs, Human Resources Managers)
- iii) Make reasonable adjustments if needed for staff who have or develop a physical disability (Responsibility - Line Managers in conjunction with Human Resources Managers)

- iv) Advertise posts in accordance with Equal Opportunities and organisational criteria (Responsibility - Human Resources Managers)
- v) Encourage applications from members of under-represented groups, including racial groups (Responsibility - Human Resources Managers)
- vi) Include Equal Opportunities in staff induction programmes (Responsibility - Employee Development Managers)
- vii) Make training available for staff according to clear, published criteria which are based on equality of opportunity (Responsibility - Employee Development Managers)
- viii) Provide in-house training programmes that raise awareness of equal opportunity and inclusive learning issues and ensure that appropriate staff attend (Responsibility - Employee Development Managers)
- ix) Make some aspects of EOP training compulsory for identified staff e.g. at induction (Responsibility: Employee Development Managers)
- x) Expect managers to apportion development opportunities as objectively and fairly as possible (All Managers)

5. Race Equality Policy

The Race Relations Act of 1976, as amended by the Race Relations Act 2000, places on all colleges a statutory general duty to promote race equality, and specific duties to help meet the general duty. These include writing and publishing a Race Equality Policy, assessing its impact and monitoring the progress of staff and students from racial minorities. The Corporation is responsible, through the Principal, for ensuring that the duties are met and the policy followed.

One of the college's core values, as expressed in its Strategic Plan, is to "be inclusive, celebrate diversity and promote equal opportunities". One of its key Strategic Aims is "to promote equal opportunities and to take positive action to redress unjustified disparities".

The college is committed to eliminating racial discrimination and promoting equality of opportunity and good relations between people of different racial groups. To achieve this it will:

General

- i) Make every effort to ensure that Corporation membership reflects the diversity of communities served by the college (Responsibility - Corporation Chair)
- ii) Accept that the college or those acting for it may unwittingly perpetrate institutionalised racism, and be prepared to examine and redress this. (Responsibility - Principal)
- iii) Encourage, support and help staff and students from minority racial groups to reach their potential, and take positive action to encourage members of under-represented racial groups to apply for posts. (Responsibility - Human Resources Managers/all staff)

- iv) Promote racial equality and good relations between groups through encouragement, word and image, and ensure that staff know their responsibilities in doing this (Responsibility - All Managers)
- v) Apply to minority racial groups all its commitments as detailed in the overall Equal Opportunities Policy. (Responsibility - as in Policy)

Monitoring

- vi) Monitor annually the application, recruitment, retention, achievement, exclusion and satisfaction of students from minority racial groups within its overall MIS statistical monitoring and publish this as summary data within the college to managers and Corporation and make it available to external enquirers. (Responsibility - Standards Managers)
- vii) Monitor annually the application, recruitment, retention and career progression of staff including any disciplinary issues, and publish this data to managers, the Corporation and, in summary form excluding confidential details, to external enquirers. (Responsibility - Human Resources Managers)
- viii) Monitor annually complaints of racial harassment of staff or students within its overall complaints monitoring, participate in the county-wide Racial Incident Monitoring and publish outcomes annually to the Corporation's Curriculum and Standards Committee. (Responsibility - Standards Managers)

Assessment

- ix) Based on internal monitoring data and any relevant external information, assess what realistic targets may be set to encourage racial equality, set them and take appropriate action to achieve them, recorded in Development Plans. (Responsibility - Standards Managers)
- x) Develop, implement and monitor the success of any Development or Operating Plans needed to further promote equality, including those arising from Self-Assessment, and report on them to the Corporation. (Responsibility - Standards Managers)
- xi) Assess the impact of the policy on staff and students from different racial groups, including regular consultation with racial minority staff and students on the extent to which they experience the college as successfully promoting race equality, and make the outcomes available to staff and students. (Responsibility - Standards Managers)
- xii) Review the Race Equality Policy along with the whole Equal Opportunities Policy every two years. (Responsibility - Standards Managers)

Training

- xiii) Provide support and training for staff in carrying out any specific responsibilities for Race Equality (Responsibility – Employee Development Managers)

External

- xiv) Contribute to the work of partner organisations and the local community in combating racial discrimination and encouraging good practice in achieving race equality (Responsibility - All staff, Partnerships & Employer Relations Managers)
- xv) Review and be prepared to discontinue any relationship with a partner organisation or sub-contractor who does not abide by the college's policy (Responsibility - All Managers)

Publication

- xvi) Publish the Race Equality Policy and the Equal Opportunities and Diversity Policy through Student Charters and Handbooks, through the college intranets and through posters. (Responsibility - Standards Managers)

Alleged infringements of the Race Equality Policy will be dealt with under the Redress Equality Policy (Responsibility - Standards Managers)

6. Monitoring and Evaluation Equality Policy

The college is committed to monitoring and evaluating the success of its policy. To achieve this it will:

- i) Agree Performance Indicators, (PIs), to measure progress in implementing equality, by comparing performance according to categories such as gender, age, race, ethnicity and additional support needs. The PIs should include:

Recruitment of staff and students

Retention and achievement of students

Career progression of ethnic minority staff

Complaints of harassment or discrimination

Participation of staff in training and development

(Responsibility - Standards Managers)

- ii) Report on the outcomes of the PIs regularly to managers, to the Curriculum and Standards Committee, and make them available to external enquirers. (Responsibility - Standards Managers)
- iii) Expect staff to include equal opportunities issues in the writing of Self-Assessment Reports. (Responsibility - Standards Managers)
- iv) Carry out periodic reviews of the impact of the policy or any of its sub-policies. (Responsibility - Standards Managers)

7. Redress Equality Policy

The college is committed to providing a means of redress to anyone who believes that the college, either collectively or through individual action, has not adhered to any aspect of the Equal Opportunities Policy including the Race Equality Policy. To achieve this it will:

- i) Publish and follow a College Complaints Procedure for students and members of the public, and promote this through the Student Charter and Handbook. (Responsibility - Standards Managers)
- ii) Publish and follow a Grievance Procedure for staff. (Responsibility - Human Resources Managers)
- iii) Define harassment (see Appendix 1), and ensure that all allegations of harassment are fully investigated under the college's Complaints or Grievance Procedures. Complaints about harassment brought by staff or students may lead to the college's Staff or Students' Disciplinary Procedures being invoked with the alleged harasser, even where criminal action has already been brought. Allegations of unprofessional behaviour will be reported to the DfES. Any allegation of harassment reported by a student under 18 years of age will be reported to the appropriate County Council's Social Services Department. (Responsibility - Standards, Learning Services, Curriculum and Human Resources Managers)

Additional responsibilities

As well as the specific responsibilities outlined above, the following apply:

Corporation: Ensure that an Equal Opportunities Policy is in place, that the Principal has allocated responsibilities, that regular monitoring is carried out and reported on and that new Corporation members are inducted into their responsibilities

Principal: Allocate and resource responsibilities for overall management of Equal Opportunities, including the establishment of appropriate groups within the college led by Senior Managers to progress the development of equality

Standards managers: Publish the Policy and make it available to staff, students and enquirers

All employees: Promote equality of opportunity in all aspects of their work and report infringements of college policy

All students: Abide by the Policy as part of their commitment to the Student Charter

All visitors to the college and sub-contractors: Abide by the Policy

All partners, franchisees, employers working with students of the college. Abide by the Policy on their own premises

Appendix 1– Definitions

Discrimination – Less favourable treatment of an individual or group which is not based on their work performance or conduct as a member of staff or student.

Equal Opportunities - The means by which disadvantage and discrimination is reduced and eliminated by legislation and positive action. Equal Opportunities aims to ensure that no group receives less favourable treatment by virtue of: age, disability, ethnic origin, gender, gender identity, learning difficulty, marital status, mental or physical health status, physical appearance, race, religion, sensory impairment, sexual orientation, skin colour, or socio-economic status. This will enable all people to have equality of access to the provision of goods, services, facilities, premises and employment. It does not necessarily mean treating everyone the same.

Gender Identity - An individual's sense of which gender they are, which may be at odds with the one shown on their birth certificate and may be expressed through "cross-dressing".

Harassment – any form of behaviour which is not a necessary part of a staff or student role, and is unwanted by the person at whom it is directed. Such behaviour need not be deliberate – it is the impact on the receiver, not the motive, which makes it harassment. The behaviour is usually distressing and hurtful to the receiver, often causing their work and studies to suffer. Harassment takes many forms, of which the following are examples,

Sexual Harassment – unwanted behaviour with sexual overtones such as:

- statements, questions, or jokes which have personal, intimate or sexual connotations
- displaying of sexually suggestive written or visual material
- repeated requests or suggestions that there should be a personal and/or sexual relationship with the harasser
- threats or promises which link career or academic development to a sexual relationship
- unwanted touching
- physical assault

Harassment on grounds of: age, disability, ethnic origin, gender, gender identity, learning difficulty, marital status, mental or physical health status, physical appearance, race, religion, sensory impairment, sexual orientation, skin colour, or socio-economic status

- unwanted behaviour which seeks to threaten, humiliate, undermine, or belittle someone on any of the above grounds, such as:
 - threatening, abusive, or insulting remarks, jokes or mimicry
 -
 - statements or jokes which imply that the person is not suitable for their position on stereotypical grounds unrelated to work performance
- statements, jokes or actions which imply that there are stereotypical characteristics associated with membership of certain groups

- distributing visual or written material with insulting portrayals or messages
- systematically excluding someone from social or group activities
- giving one person a heavier or more difficult workload, or constant unjustified criticism

Prejudice – An opinion or feeling about people of a different group which is formed beforehand, without informed knowledge, thought or reason and which is likely to be sustained even in the face of evidence to the contrary.

Racialism – An implicit set of negative beliefs about a racial or ethnic group. Can result in offensive or violent behaviour towards members of a racial or ethnic group.

Racial Discrimination – Less favourable treatment of an individual or group on account of their racial origin or colour.

Racism – All attitudes, procedures and patterns – economic, social and cultural – whose effect, though not necessarily whose conscious intention, is to create, maintain and extend the power, influence and privilege of one group of people over another.

Sexism – All attitudes, procedures and patterns – economic, social and cultural – whose effect, though not necessarily whose conscious intention, is to create, maintain and extend the power, influence and privilege of one group of people over another.

Sexual Discrimination – Less favourable treatment of an individual or group on account of their gender or marital status.

Appendix 2

National Legislation

The Rehabilitation of Offenders Act 1974

The Sex Discrimination Act 1975

The Sex Discrimination Regulations 2001

The Equal Pay Act 1975

The Equal Pay Act 1986

The Race Relations Act 1976

The Race Relations Act Amendment 2000

The Disability Discrimination Act 1995

The Special Educational Needs and Disability Act 2001 (“SENDA”)

The Human Rights Act 1998

The Employment Framework Directive 2001

Employment Equality (Religion or Belief) Regulations 2003

Relevant College Policies

Sussex Downs College Strategic Plan 2002-2005

Sussex Downs College Complaints Policy

Sussex Downs College Student Management Procedures

Sussex Downs College Staff Disciplinary Policy

Sussex Downs College Student Charter

Joint Agreement on Guidance for Equality in FE (AOC et al) Feb 2002

APPROVED BY CURRICULUM AND STANDARDS COMMITTEE JULY 2002

REVIEWED, UPDATED AND APPROVED BY CST JANUARY 2005

LAST REVIEW DATE: SEPTEMBER 2009

NEXT REVIEW DATE: SEPTEMBER 2010