

Regent College London

Equality and Diversity Policy

1. Purpose

1.1 To provide an Equality and Diversity Policy applicable to all staff, students and others involved with Regent College based on best practice in the UK higher education sector.

1.2 To provide an Equality and Diversity Policy that supports coordination and implementation at a strategic level, reflects Regent College London's (the College) core values, and to ensure that it is embedded within appropriate College policies for staff and students.

2. QAA UK Quality Code

2.1 This Policy aligns with the UK Quality Code core and common practices in

Expectations for Quality:

From admission through to completion, all students are provided with the support that they need to succeed in and benefit from higher education.

- The provider has a reliable, fair and inclusive admissions system.
- The provider actively engages students, individually and collectively, in the quality of their educational experience.
- The provider has fair and transparent procedures for handling complaints and appeals which are accessible to all students.
- The provider supports all students to achieve successful academic and professional outcomes.
- The provider engages students individually and collectively in the development, assurance and enhancement of the quality of their educational experience.

This Policy also incorporates the following Guiding Principles set out in

the Advice and Guidance for Admissions, Recruitment and Widening Access:

- 1. Policies and procedures for application, selection and admission to higher education courses are transparent and accessible.
- 3. Higher education providers reduce or remove unnecessary barriers for prospective students.
- 4. Information provided to prospective students for recruitment and widening access purposes supports students in making informed decisions.
- 5. All staff, representatives and partners engaged in the delivery of admissions, recruitment and widening access are appropriately trained and resourced.
- 6. Providers continually develop widening access strategies and policies in line with local and national guidance.

the Advice and Guidance for Learning and Teaching:

- 3. Effective learning and teaching provides students with an equivalent high-quality learning experience irrespective of where, how or by whom it is delivered.
- 6. Effective learning and teaching activities, facilities and resources make the learning environment accessible, relevant and engaging to all students.

the Advice and Guidance for Enabling Student Achievement:

- 2. Clear, accessible and inclusive policies and procedures to enable students and staff to identify when support mechanisms may be required for academic and personal progression.
- 3. Training and resources are allocated to student support services to enable effective delivery, ensure comprehensive evaluation and subsequent development.
- 4. Clear, consistent and accessible communication about opportunities and support available to students from pre-entry through to completion and beyond.
- 5. Equality of opportunity for all students to develop academic and professional skills.
- 6. Provide an accessible, inclusive and engaging community that incorporates staff and students to facilitate a supportive environment.
- 9. Actively seek the feedback and engagement of students and staff to ensure continuous improvement of the learning environment.

the Advice and Guidance for Assessment:

- 4. Assessment is inclusive and equitable.
- 5. Assessment is explicit and transparent.

the Advice and Guidance for Student Engagement:

- 5. Providers recognise and respond to the diversity of their student body in the design and delivery of student engagement, partnership working and representation processes.

the Advice and Guidance for Concerns, Complaints and Appeals:

- 2. Concerns, complaints and appeals procedures are accessible and inclusive.
- 4. People raising concerns or making complaints or appeals are treated with dignity and respect, and their well-being is properly considered.
- 6. Concerns, complaints and appeals procedures are fair and impartial.

3. Equality and Diversity Policy Statement

3.1 Regent College London is committed to supporting, developing and promoting equality and diversity in all of its practices and activities and aims to establish an inclusive culture free from discrimination and based upon the values of dignity, courtesy and respect. Regent College London will support and develop its staff through providing all with access to facilities, personal and career development opportunities and employment on the basis of equality. Regent College London is committed to creating and sustaining a positive, supportive and excellent teaching and learning environment for its students. We are

committed to providing fair, equitable and mutually supportive learning and working environment for both our students and our staff.

3.2 Regent College London is committed to eliminating discrimination and advancing equality on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief (including lack of belief), sex and sexual orientation.

3.3 Regent College London values diversity and recognises that our college is greatly enhanced through the wide and disparate range of backgrounds, experiences, views, beliefs and cultures represented within its staff and student groups. We aim to embrace diversity in all of its activities and proudly acknowledge that variety and difference are intrinsic to the wellbeing and future development our College.

3.4 Regent College London's Equality and Diversity Policy underpins our Mission and Strategic Plan.

3.5 Our Equality and Diversity Policy applies to all students and prospective students, to all applicants for staff positions with the College, to all staff employed on a full time or part-time basis, to all staff on permanent or temporary contracts, to agency staff, to honorary title/contract holders and visitors undertaking duties in the name of the College and to sub-contractors undertaking work on the College site, and all visitors to the College.

4. Relationship to Regent College London's Mission and Strategic Plan

4.1 Our Strategic Plan 2018-21 provides the following guiding Mission statement and values for Regent College London:

Mission

To provide academic and professional education for UK, EU and overseas students based on secure academic standards, high quality learning opportunities and meeting employer needs within a transformative private education sector in the United Kingdom.

Values

- Providing a student experience of the highest quality and with quality enhancement embedded in all we do
- Valuing opportunity, diversity and inclusiveness
- Enabling a culture of professionalism openness, empowerment, responsibility and excellence
- Rewarding success and learning to do better

- Proactive and innovative in responding to challenges in a rapidly changing world
- Performance through valuing staff and continuous staff development
- Sustainability, value for money and adding value in all we do

The second and third of these values relate directly to equality and diversity and directly inform this Equality and Diversity Policy.

5. Objectives of the Equality and Diversity Policy

5.1 Regent College London is committed to ensuring that an environment is created that respects the diversity of staff and students and enabling them to achieve their full potential. To achieve these objectives the following basic rights for all existing and prospective staff and students are acknowledged:

- (a) to be treated with respect and dignity
- (b) to be treated fairly with regard to all policies, procedures, assessments and related activities
- (c) to be encouraged to reach one's full potential

5.2 Further objectives of this policy are to ensure that in carrying out activities related to the College's higher education provision due regard will be given to:

- (a) eliminating unlawful discrimination, harassment and victimisation
- (b) advancing equality of opportunity across all the activities of the College
- (c) fostering good relations between people of a diverse background.

5.3 Through implementation of this policy, Regent College London will aim to:

- (a) develop and promote a culture of equality and diversity throughout the College
- (b) develop and promote a culture of dignity, courtesy and respect
- (c) support staff and students, including provision of relevant support relating to age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief (including lack of belief), sex and sexual orientation
- (d) work to prevent all forms of unlawful discrimination
- (e) deal with all forms of discrimination consistently and effectively
- (f) ensure that this Equality and Diversity Policy influences and informs the culture of the College.

5.4 Regent College London will work to ensure that staff, students, prospective staff and students, visitors, contractors and sub-contractors working for the College are aware of our commitment to equality and diversity.

6. Roles and Responsibilities

6.1 It is the responsibility of all members of Regent College's community to behave with dignity, courtesy and respect, and to act in a manner that does not unlawfully discriminate at all times.

6.2 Role of Staff

Staff at Regent College London have the following responsibilities with respect to adherence to this Equality and Diversity Policy:

- to actively encourage non-discriminatory practices and to report any incidences of behaviour that fail to comply with this Policy
- to be aware of and support this Equality and Diversity Policy
- to support the objectives and aims of the College's Equality and Diversity Policy;
- to undertake appropriate equality and diversity training.

6.3 Role of Students

Students at Regent College London have the following responsibilities with respect to adherence to this Equality and Diversity Policy:

- to actively to encourage non-discriminatory practices and to report any incidences of behaviour that fails to comply with this Policy
- to be aware of and support this Equality and Diversity Policy
- to support the aims and objectives of this Equality and Diversity Policy
- to be aware of equality and diversity issues.

6.4 Role of Human Resources Department

The Human Resources Department at Regent College London has the following responsibility with respect to supporting this Equality and Diversity Policy:

- to provide appropriate equality and diversity awareness and training to staff
- to support the Principal of the College in implementing the Policy;
- to ensure that staff recruitment advertising, selection and appointment procedures, performance management processes and disciplinary grievance processes are fair and transparent and are consistently applied.

6.5 Role of Senior Management

Senior management of Regent College London include the Principal, Chief Operations Officer, Head of Standards and Quality Enhancement, Academic Dean and Registrar. With respect to this Equality and Diversity Policy, senior management are responsible:

- to ensure that members teaching and administrative staff receive appropriate equality and diversity training
- to investigate all aspects of alleged discrimination, harassment and inappropriate behaviour promptly and thoroughly
- to ensure that selection and appointment procedures, performance management processes, staff development opportunities, and disciplinary and grievance processes are fairly and consistently applied to all staff
- to treat all staff applications for flexible working practices on a fair and equitable basis, and to provide reasonable and objective reasons when such requests are refused
- to ensure that student selection and admissions procedures, assessment processes, career development opportunities and disciplinary and complaints procedures are fairly and consistently applied to all students
- to provide leadership in the implementation, operation and understanding of this Equality and Diversity Policy;
- to be accountable for any issues concerned with failure to adhere to this Equality and Diversity Policy.

7. Application of the Equality and Diversity Policy: Staff

7.1 Recruitment and Selection

Recruitment advertising will encourage applications from all sectors of the community reflecting the College's commitment to equality and diversity. Recruitment advertising will appear in publications appropriate to the audience capable of producing the best candidates (subject to budget considerations). Job descriptions, person specifications and recruitment advertisements will be written on the basis of the essential and justifiable requirements of the position. Shortlisting, appointment and rejection decisions will be transparent and justifiable.

7.2 Grading and Promotion

All grading and promotions criteria and procedures will be free from prejudice and must be applied equitably and consistently.

7.3 Staff Development

All staff will have equal access to induction, personal and career development opportunities and facilities.

7.4 Performance Management

Probation and appraisal procedures will be clear and transparent and will be applied fairly across all staff.

7.5 Discipline and Grievance

Disciplinary and grievance procedures will be applied fairly and transparently for all staff. Allegations of discrimination, harassment or inappropriate behaviour will be dealt with under the appropriate disciplinary procedures for staff.

8. Application of the Equality and Diversity Policy: Students

8.1 Recruitment, Selection and Admission

All information contained in prospectuses, websites and other material used in the recruitment of students will promote equality of opportunity and make reference to this Policy. All staff involved in the recruitment, selection and admission of students will have an awareness of equality and diversity.

8.2 Assessment

There will be clear, consistent and transparent criteria for student assessments and all assessments will take place on an equal opportunities basis.

8.3 Career Planning and Participation

All students will have access to career planning support and will be encouraged to participate fully in the academic, cultural and social life of Regent College L.

8.4 Discipline and Student Complaints

Discipline and student complaints policies and procedures will be applied fairly and transparently for all students. Allegations of harassment or discrimination will be dealt with under the Student Disciplinary Code.

9. Visitors, Contractors and Sub-Contractors

9.1 Visitors, contractors and sub-contractors must comply with the College's Equality and Diversity Policy. College staff meeting/employing visitors, contractors and sub-contractors are responsible for making them aware of the College's Equality and Diversity Policy.

10. Training

10.1 Equality and diversity awareness raising and training will be mandatory for all staff. Information will be provided to all in order to raise awareness of equality and diversity and the contents of this Policy during induction training.

10.2 Students will be briefed about the College's Equality and Diversity Policy during induction at the start of their studies and at least once a year thereafter. Any changes to the Equality and Diversity Policy will be communicated to students through the College's virtual learning environment (HELP).

11. Communication

11.1 The Equality and Diversity Policy will be made available to staff, students, prospective students and the public more generally on the College’s website. This Policy and related information, including web-links, will be made available for students and staff on the virtual learning environment (HELP).

12. Breach of Regent College London’s Equality and Diversity Policy

12.1 Contravention or breach of the Equality and Diversity Policy will be treated as a disciplinary matter and offenders will be dealt with under the staff or student disciplinary policies, as appropriate.

13. Data Collection and Monitoring

13.1 The personal data of students and staff are collected and used in accordance with the Data Protection Act 2018. The Principal, Head of Standards and Quality Enhancement and Registrar are collectively responsible for monitoring the data available for each of the protected characteristics and taking appropriate action to advance equality and diversity. These senior Regent College London staff monitor student enrolment, retention, achievement and success at appropriate points throughout the academic year.

13.2 Evaluative reports, such as the Annual Course Quality Monitoring report and Pearson’s Annual Programme Monitoring Report, present and evaluate student data. Where there are differences in the data for different groups of students, actions should be identified to help reduce and eliminate unwarranted differences.

13.3 The College’s Academic Board and Senior Leadership Team (SMT) are responsible for monitoring equality and diversity data relating to students and the Human Resources Manager is responsible for monitoring equality and diversity data for staff.

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Appendix 1: Glossary of key words/terms

Age A protected characteristic. A person belonging to a particular age (for example, 65 year olds) or a range of ages (for example 50 to 60 years of age).

Direct Discrimination Is where a person or group of people is treated less favourably than another individual or group of people because of a protected characteristic.

Direct Discrimination by Association Is where a person or group of people is treated less favourably because they associate with another person or group of people who has protected characteristics.

Direct Discrimination by Perception Is where a person or group of people is treated less favourably than another person or group of people because other people or groups of people think they have a protected characteristic.

Disability A protected characteristic. A person has a disability if they have a physical or mental impairment which has a substantial long term and adverse effect of the person's ability to carry out normal everyday activities. Long term means that the disability has lasted or is likely to last for at least twelve months. Substantial means more than minor or trivial.

Diversity Diversity is concerned with acknowledging, respecting and valuing differences between individuals and groups of people.

Equality Equality is about ensuring that people are treated fairly and given equal opportunities. Equality is *not* about treating everyone in the same way. Equality is about ensuring that different individuals and groups have their needs met in appropriate ways. Equality offers a framework that enables opportunity, access, participation and contribution that is fair and inclusive.

Equality Impact Assessment Is a process whereby a policy, procedure or practice is reviewed, and if necessary amended, to ensure that it does not discriminate against any person or group of people with a protected characteristic.

Gender Reassignment A protected characteristic. This is the process of transitioning from one gender to another and is a personal process, rather than a medical process (it does not require someone to undergo medical treatment to be protected). Transsexual refers to a person who has the protected characteristic of gender reassignment. It is important not to confuse gender reassignment with sexual orientation. A transsexual person can be a gay man, lesbian, heterosexual or bisexual.

Harassment Is where a person or group of people behave in such a way that their conduct has the purpose or effect of creating an environment that is hostile, degrading, humiliating or intimidating.

Indirect Discrimination A rule or policy that applies to everyone and as a consequence disadvantages people or groups of people with protected characteristics.

Marriage and Civil Partnership A protected characteristic. Marriage is a legal union between a man and a woman, a man and a man, and a woman and a woman. Same sex couples can also have their relationship legally recognized as a civil partnership. Civil partners must be treated the same as married couples on a wide range of legal matters.

Positive Action Positive action means offering targeted assistance to people so that they can take full and equal advantage of particular opportunities. Positive action means taking steps to ensure that all groups of people have equal opportunity of access to, for example, a college's services and facilities.

Pregnancy and Maternity A protected characteristic. Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after birth and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for twenty six weeks after giving birth and this includes treating a woman unfavourably because she is breastfeeding.

Protected Characteristics Protected characteristics are definitions for groups of people given protection under the Equality Act 2010. Protected characteristics are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion, and belief, and sex and sexual orientation.

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

Reasonable Adjustment The duty to make reasonable adjustment is made up of three requirements. For providers of education these requirements are to take reasonable steps to:

- (i) Avoid the substantial disadvantage where a provision, criterion or practice puts disabled students at a substantial disadvantage compared to students who are not disabled.
- (ii) Remove or alter a physical feature or provide a reasonable means of avoiding such a feature where it puts disabled students at a substantial disadvantage compared to students who are not disabled.
- (iii) Provide an auxiliary aid where disabled students would, but for the provision of such an auxiliary aid, be put at a substantial disadvantage compared to students who are not disabled.

Religion or belief A protected characteristic. Religion means any religion or a lack of religion. A religion need not be mainstream or well-known to gain protection as a religion. A religion must have a clear structure and belief system. Belief system means any religious or philosophical belief and includes lack of belief. A belief should affect your life choices or the way you live for it to be included in the definition.

Sex A protected characteristic. A male or a female.

Sexual Orientation A protected characteristic. Sexual orientation is a person's sexual attraction to persons of the same sex (a gay man or a lesbian), persons of the opposite sex (heterosexual) or either sex (bisexual).

Victimisation Is where a person or group of people are treated less favourably because they have, for example, raised a complaint or grievance under the Equality Act 2010.

Appendix 2: Legislative Framework

The Equality Act 2010 (<https://www.gov.uk/guidance/equality-act-2010-guidance>) brought together over 116 separate pieces of legislation into one single Act. Combined they make up a new Act that provides a legal framework to protect the rights of individuals and advance equality of opportunity for all. The Act protects individuals from unfair treatment and promotes a fair and more equal society.

The nine main pieces of legislation that were merged into the Equality Act 2010 were:

- The Equal Pay Act 1970
- The Sex Discrimination Act 1975
- The Race Relations Act 1976
- The Disability Discrimination Act 1995
- The Employment Equality (Religion or Belief) Regulations 2003
- The Employment Equality (Sexual Orientation) Regulations 2003
- The Employment Equality (Age) Regulations 2006
- The Equality Act 2006, Part 2
- The Equality Act (Sexual Orientation) Regulations 2007

Protected Characteristics are definitions for groups of people given protection under the Equality Act 2010.

Appendix 3: Examples of Discrimination, Harassment and Victimisation

(a) Example of direct discrimination

A college providing higher education programmes rejects a prospective male student's application to a childcare programme of study because the Admissions Tutor does not think it appropriate for a male to be working with young children.

This would constitute unlawful discrimination on the grounds of the protected characteristic of sex.

(b) Example of direct discrimination by association

Jane applies to a language class and discloses to the tutor that her boyfriend is Jewish, although she is not. The tutor then tells Jane that he has made a mistake and that the class is

actually full. Later, Jane finds out that others have been allowed to join the language class after she was refused entry.

The tutor's conduct is likely to amount to direct discrimination by association because of religion or belief as a result of Jane's association with her Jewish boyfriend.

(c) Example of direct discrimination by perception

Jason, a landlord, advertises a flat to rent in a local paper and Mark meets Jason to view the flat and find out further details. Jason assumes that Mark is gay because of his mannerisms, voice and style of dress. As Jason does not want to rent his property to a gay man, he informs Mark that the flat is no longer available.

This is indirect discrimination because of sexual orientation due to Jason's perception that Mark is a gay man.

(d) Example of indirect discrimination

In a neighbourhood that includes a large Muslim community, a local community group provides lunch for elderly people but they say that because the supplier cannot provide Halal meals they are unable to provide meals for Muslim customers. The policy not to supply Halal meals would disadvantage Muslim people in particular.

The community's group policy not to supply Halal meals is unlikely to be justifiable since they could simply seek an alternative supplier that could supply Halal meals.

(e) Example of Harassment

A member of staff makes a derogatory remark about a student going through gender reassignment. Another member of staff finds the first member of staff's remark offensive.

The member of staff's derogatory remark would constitute harassment.

(f) Example of victimisation

An individual ran a training seminar for unemployed people to help them prepare their CVs. Ahmed, a Muslim delegate attending the seminar, wrote to complain that he was not excused from part of the seminar to attend afternoon prayers. The next time Ahmed applied to attend a follow up seminar he was told that there were no places left, but later found out that his friend had been given a place, even though he had applied after Ahmed.

Ahmed had been victimized because he had made a complaint related to his religion.

(g) Example of disability discrimination

A student diagnosed with autism often speaks out of turn during tutorials, which can create a disruptive atmosphere for the tutor and other students. Because of his behaviour the student with autism is asked not to attend tutorials in future.

This is likely to constitute discrimination arising from disability.