INSPIRING LEARNING
SINCE 1854

WM College

Equity, Diversity & Inclusion (EDI) Policy

Created by	Principal
Approved by	Board of Governors
Version	1.0
Review date	April 2025
Date of next review	April 2028

EQUALITY IMPACT ASSESSMENT

What is the reason for carrying out this equality impact assessment?		**Choose One**
The introduction of or a significant change to a policy/practice is proposed/planned		x
An existing policy/practice is being reviewed		
Business case for a new or changed practice		
Staffing realignment or restructure proposal		
	Judgement	**Supporting notes if required**
Does the proposal align with the intention of the College's Equality Diversity & Inclusion Policy?	Yes	
Does the proposal in any way impact unfairly on any protected characteristics below?		
- Age	No	
- Disability or Learning Difficulty	No	
- Gender Reassignment	No	
- Marriage or Civil Partnership	No	
- Race	No	
- Religion or Belief	No	
- Sex	No	
- Sexual orientation	No	
Does the proposal contain any language/terms/references/phrasing that could cause offence to any specific groups of people or individuals?	No	
Does the proposal discriminate or victimise any groups or individuals?	No	
Does the proposal include any positive action to support underrepresented groups of people or individuals?	Yes	
How do you know that the above is correct?		The Policy has been reviewed by the Senior Management team and has been approved by the Principal.

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1. Statement

Equity, Diversity and Inclusion is one of our core values. WM College is made up of talented people. Each of us is unique, whether in terms of our background, personal characteristics, experience, skills or motivations. We value our learners and our colleagues for the differences they bring to the college. These differences - this diversity - is powerful and are a source of strength.

We seek to develop an inclusive culture which helps each of us to benefit from a wider range of these different perspectives, experiences and skills. We believe that this creates a happier, more productive working and learning environment for us all.

To support this inclusive culture, this policy:

- outlines our commitment to challenging discrimination and helping staff and learners reach their full potential.
- explains the behaviours we expect from all members of the college community and includes but is not restricted to learners, staff, visitor, stakeholders and community partners.
- sets out the key steps we take to make our culture as inclusive as possible, including our diversity and inclusion framework (Appendix 2) and how we ensure equity of opportunity throughout the college.

This policy does not form part of any contract of employment or learning agreement and we reserve the right to amend or withdraw it at any time.

2. Scope

This policy applies to anyone working, learning and visiting the college. This includes but is not restricted to employees, learners, contractors, volunteers and apprentices.
The policy also relates to job applicants and is relevant to all stages of the employment relationship.

Cultivating this culture does not happen by accident but requires ongoing commitment and nurturing. The reality is that we live in a world where areas of difference (whether disability, gender, sexual orientation, ethnicity or others) often translate to barriers, challenges and biases that may not be faced by others. We are mindful that race, class, gender and other personal characteristics 'intersect' with one another and overlap. This policy encourages listening and respecting individual experiences.

The policy accompanies our:

- Learner Journey Policy
- Learner Code of Conduct
- Safeguarding & Prevent Policy & Procedure
- Additional Learning Support Policy
- Fitness to Learn Policy & Procedure
- Inclusive language guide
- Exams Disability Policy
- Complaints Policy & Procedure

HR policies

- Flexible working policy
- Family Friendly policy
- Recruitment & Selection Policy & Procedure
- Code of Conduct for Staff
- Dignity at Work Policy & Procedure
- Whistleblowing Policy

3. Responsibility

The College's Governing Body is accountable for ensuring the college fulfil its Public Sector duty. They approve the EDI Policy and monitor its implementation through reports.

The Governing Body delegates overall responsibility for EDI and this policy to the Principal and CEO. This includes agreeing the action plan and publishing the annual EDI report.

Managers are responsible for ensuring EDI is embedded in the culture and every area of the college. Between them they cover our curriculum, teaching and learning, learner services, HR, facilities, accommodation, catering, marketing, finance and partners. They manage the college's resources and have control of the data processes needed to measure impact.

4. Our commitment to you

The college celebrates and values a culture of equity, diversity and inclusion and as such will ensure that diversity is promoted throughout all its services and activities.

We are committed to promoting a working environment based on dignity, trust and respect, and one that is free from discrimination, harassment, bullying or victimisation.

The college opposes any form of discrimination.

We ensure that we remove or minimise disadvantages, promote understanding and tackle prejudice and that no one is treated less favourably because of their:

- disability
- gender, gender identity or gender reassignment status
- marital status
- race, racial group, ethnic or national origin, or nationality
- religion or belief
- sexual orientation
- age
- civil partnership status
- pregnancy or maternity
- paternity
- educational background
- socio-economic background
- caring responsibilities

We treat our learners, colleagues, and third parties (including volunteers, suppliers, contractors, agency staff and consultants) fairly and with dignity, trust and respect. Sometimes, this may mean allowing for different views and viewpoints and making space for others to contribute.

By embedding such values and constructively challenging inappropriate comments or ways of working, we can help achieve and maintain a truly inclusive culture.

We commit that any dealings that you have with colleagues, learners or third parties must be free from any form of discrimination, harassment, victimisation or bullying.

The college will actively engage with staff, learners and stakeholders on key matters relating to EDI.

The college will publish an annual Equity, Diversity and Inclusion report, including workforce monitoring data, learner data and the college's EDI priorities.

Talking about disability

We understand that some people find it hard to discuss their disabilities and that not all disabilities are visible. We strive to create an environment where people feel able to speak up about their experiences without fear of negative consequences

We also recognise that 'disability' is a dynamic term, within which terms such as 'neurodivergence' and 'neurodiversity' are emerging and changing, including the relationship between neurodivergence and definitions of disability.

However, this is only possible if we treat people with dignity, trust and respect and we expect everyone to uphold these values.

We do not tolerate ableist language in our organisation. Ableist language is language that is negative, inappropriate or offensive towards people with a disability and may take the form of jokes or "banter". If you adopt such language, we will take action under our Learner Conduct Policy & Procedure or the Disciplinary Policy & Procedure.

Curriculum

Within the curriculum, our commitment is to have:

Induction procedures which familiarise learners with the college's policy and commitment to equity and diversity will be delivered to all learners and the Enrichment & Diversity calendar will be promoted to all learners

Inclusive learning practices which acknowledge learners starting point, their motivation and preferred learning styles to permeate the delivery or provision

Cultural awareness and intersectionality in the classes to foster good relations and equality for all protected groups

The provision of additional learning support will be determined based on the assessment of each individual student's support requirements and will have due consideration to the application of reasonable adjustments and the college's anticipatory duties

Learning materials which are free from bias, which celebrate diversity and challenge stereotyping will be used throughout the curriculum.

Forums

We are proud to have employee and learner forum to provide an opportunity for people who have a passion for, or a connection with, a particular aspect of equity, diversity and inclusion.

The aim of these forums is to:

- provide networking opportunities and community support.
- organise events to raise awareness and provide education; and
- contribute ideas and suggestions for ways the organisation can be more diverse and inclusive.
- Review and monitor the action plan so that it is transparent, and the management is held accountable

Diversity & Enrichment Activities for Learners

As part of our ongoing journey toward greater equity, diversity, and inclusion (EDI), we've created a diversity calendar to highlight important events and foster a culture where everyone feels included.

The calendar comprises of:

- Events and celebrations taking place at WM College.
- Events and celebrations taking place in and around WM College's local community.
- Events and celebrations that are generally recognised globally

Equity of opportunity

Recruitment of learners

WM College is committed to actively promoting equity of opportunity, to ensure all learners achieve success on an appropriate course of study, to raise aspirations, and to support learners to reach their learning potential.

College courses will be advertised and promoted with a view to reaching the local community, including those deemed to be hard to reach via local community organisations such as community centres and Libraries.

All course information will be presented clearly using plain English, to ensure that potential learners are able to make an informed decision. The college's website provides Accessibility Tools, including translation into community languages.

The college publicity and marketing will reflect the cultural diversity of the college community.

Information about special facilities and resources for learners with learning difficulties and/or disabilities will be included on the website.

Key documents are available in other formats upon request.

Disability inclusion

The college employs a Disability Officer whose role and responsibilities are:

- To provide college managers with advice and guidance to support the college in being compliant with equity and disability legislation for learners and colleagues
- Provide appropriate guidance and support to staff working with learners with disabilities.
- To assess learners with disabilities and make recommendations for adjustments
- To provide additional learning support to learners who have been identified as having a learning need.

Recruiting learners with a disability

Learners are encouraged and provided with opportunities to disclose their learning support needs prior to entry to enable the college to provide advice and guidance to learners and to assess any additional needs in a timely and comprehensive manner. The college will:

- Ensure that every effort is made to make use of pre-enrolment information in a timely manner.
- Ensure that once a learning need has been identified, an initial assessment meeting is arranged to ascertain the learner's individual learning and support requirements.
- Provide a suitably qualified member of staff from the Additional Learning Support Team to carry out the assessment and, at that meeting, a Personal Learning Plan (PLP) will be agreed with the learner.

Additional learning support is provided in order that learners with additional support needs can benefit from an education which is directed to the development of the personality, talents and mental and physical abilities of that learner to their fullest potential.

Reasonable adjustments - Learners

The Additional Learning Support Team will also ensure that, where appropriate, all teaching and support staff involved in the delivery of learning are provided with information that facilitates support, including reasonable adjustments.

Dependent on need, these adjustments will include some of the following:

- Ensuring that teaching is differentiated in terms of times and delivery methods
- Learning materials are inclusive
- Provision of learning support assistance in class
- Provision of additional learning support out of class
- Provision of specialist support such as dyslexia
- Provision of study skills support
- Provision of physical/mobility support
- Provision of assistive equipment or adaptations
- Exam access arrangements

Recruitment of staff

We take reasonable and appropriate steps to encourage job applications from as diverse a range of people as possible.

Anyone making a decision about recruitment must not discriminate in any way and must have completed the Safter Recruitment in Education Training.

Every decision-maker should challenge themselves, and other members of the recruitment selection panel, to make sure that any stereotypes, unconscious bias or prejudice do not play any part in recruitment decisions.

Recruiting staff with a disability

The recruiting manager will consider disability and neurodiversity in advance of a recruitment campaign so that advertising, application forms and assessments, arrangements for interviews, job descriptions and employee specifications, and selection criteria are appropriate and as inclusive as possible.

We will ask applicants at the outset if they require any reasonable adjustments to be made to the recruitment process. These may include ensuring easy access to the premises for an interview, providing a suitable chair for an interview with a candidate suffering from back problems, hearing loops for a candidate who is deaf.

Anyone involved in the interview process, must not ask job applicants about their health or disability except with prior approval from HR. Such approval is given only in exceptional circumstances and where there are specific legal grounds for doing so.

Reasonable adjustments - Staff

Staff do not have to disclose a disability; however we would encourage that staff disclose any disability that may impact on their working conditions so that we can put support in place. For example by making reasonable adjustments to our premises or to aspects of your role, or to our working practices, or the learning environment.

If employees are experiencing difficulties at work because of a disability, colleagues should contact their line manager or HR to discuss potential reasonable adjustments that may alleviate or minimise such difficulties. We may need to discuss needs with you and your medical adviser or Occupational Health to help us get the right support in place.

For colleagues who are returning from long-term disability-related absence, we have a return-to-work support programme in place. For further information, please contact your line manager or HR.

Career development for staff

Any decision we make relating to a person's promotion or career development must be free from discrimination.

We ensure that selection criteria and processes for recruitment and promotion are reviewed on a regular basis so that there is no discriminatory impact on a certain group.

Training for Staff

Colleagues involved in making decisions about a person's employment, must attend appropriate equity, diversity and inclusion training.

All new starters must attend equity, diversity and inclusion training as part of their onboarding programme.

Every current employee must attend regular equity, diversity and inclusion training on at least on a three yearly basis.

We expect all our colleagues to proactively support our equity, diversity and inclusion initiatives by attending events and workshops organised by the college to educate themselves on the challenges faced by others and how to help alleviate these in the workplace.

Accessibility - Building

Tours enable our organisation to gain a better insight into accessibility issues from the perspective of the person with a disability. Anyone experiencing accessibility issues due to their disability, for example because of aspects of our premises, may arrange a tour with our Disability Officer or our HR team.

Recognising differences

The college caters for dietary requirements e.g. halal, kosher. We welcome cultural and religious differences in clothing and appearance, e.g. hijab, kippah. We support leave for religious festivals - the college closes for Christmas, but staff practicing other religions may take holiday on dates significant to them.

We are mindful of religious festivals when drawing up college wide activities including on demand exams and staff events.

To support learners and colleagues we provide a quiet contemplation room which may be used for prayer or other quiet secular activities.

5. **Monitoring and review**

We analyse diversity and inclusion data (in compliance with our data protection obligations) on an ongoing basis to assess the impact of this policy and our equity, diversity and inclusion action plan.

We publish our EDI action plan and data on our website.

We undertake to publish an annual EDI report which will provide data on:

- Learner enrolment by gender, age, ethnicity and disability
- Analysis of staffing profile in relation to recruitment, work force demographic profile.
- Demographic profile of Governors

We will publish details on equal pay and our commitment to the London Living Wage as part of the Mayor's Good Work Standard accreditation.

6. What we expect from you

We expect you, and every one of our learners, colleagues, contractors and visitors to take personal responsibility for observing, upholding, promoting and applying this policy. Our culture is made in the day-to-day working interactions between us so creating the right environment is a responsibility that we all share.

7. Compliance

The college will ensure that this policy is implemented effectively and efficiently. It is the responsibility of each member of the college staff in their role to ensure that action is taken to rectify where a policy implementation may have failed.

If any learner or colleague is found to have committed, authorised or condoned an act of discrimination, harassment, victimisation or bullying, we will take action against them including (for those to whom it applies) under our Learner Conduct Policy & Procedure or, if staff, under our Disciplinary Policy & Procedure

APPENDIX 1

Definitions

Equity

Equity is making sure individuals or groups of individuals are treated fairly and equally specific to their needs including areas of race, gender, disability, religion or belief, sexual orientation and age.

Diversity

Diversity aims to recognise, respect and value people's differences to contribute and realise their full potential by promoting an inclusive culture for all staff and students.

Inclusion

Inclusion is seen as a universal human right. The aim of inclusion is to embrace all people irrespective of race, gender, disability, medical or other needs. It is about giving equal access and opportunities and abolishing any type of discrimination and intolerance (removal of barriers).

Discrimination

The Equality Act 2010 prohibits discrimination because of certain protected characteristics. These are:

- disability
- sex
- gender reassignment
- marital or civil partnership status
- race
- religion or belief
- sexual orientation
- age; and
- pregnancy or maternity.

Discrimination can be intentional or unintentional and may occur directly, indirectly, by association, or by perception (see different types of discrimination under Equity Act 2010).

There are also two specific types of discrimination that apply only to disability: "discrimination arising from disability" and "failing to make reasonable adjustments" (see Different types of discrimination under the Equality Act 2010).

Discrimination is not always obvious and can be subtle and unconscious. This stems from a person's general assumptions about the abilities, interests and characteristics of a particular group that influences how they treat those people (known as "unconscious bias"). Such assumptions or prejudices may cause them to apply requirements or conditions that put those in particular groups at a disadvantage. Examples include:

- steering colleagues or learners, into particular types of work on the basis of stereotypical assumptions without considering the particular attributes and abilities of individuals
- recruiting or promoting individuals into particular roles, including in the classroom, because of assumptions about the reactions or preferences of other colleagues or learners; and
- using different standards to the detriment of different groups of learners or colleagues to judge performance.

Different types of discrimination under the Equality Act 2010

- **Direct discrimination:** Treating someone less favourably because of a protected characteristic compared with someone who does not have that characteristic (for example choosing not to recruit someone because they are disabled, and you think they "wouldn't fit in" to the team).
- **Indirect discrimination:** Where a policy, procedure or way of working that applies to everyone puts people with a particular protected characteristic at a disadvantage, compared with people who do not have that characteristic, unless there is a good reason to justify it. An example is introducing a requirement for all colleagues to finish work at 6pm. It is arguable that female employees, who statistically bear the larger share of childcare responsibilities could be at a disadvantage if the new working hours prevent them from collecting their children from school or nursery.
- **Associative discrimination:** Treating someone less favourably because they are associated with someone who has a protected characteristic, for example because their partner is transgender.
- **Discrimination by perception:** Treating someone less favourably because you perceive them to have a protected characteristic even if they do not, for example choosing not to promote someone because you mistakenly perceive them to be gay.
- **Discrimination arising from disability:** Treating someone unfavourably because of something connected with that person's disability and where such treatment is not justified. Examples include:
    - dismissing or failing to pay a bonus to someone because of their disability-related absence; or
    - disciplining someone for losing their temper where such loss of temper was out of character and was due to severe pain caused by them having cancer.

    - not moving a class to more accessible classroom putting a learner with a mobility issue at a disadvantage, i.e. they may not be able to attend.

- **Failing to make reasonable adjustments:** Employers and educational establishments are legally obliged to make reasonable adjustments to ensure that aspects of employment and learning, or the college premises, do not put a disabled person at a substantial disadvantage. Failing to comply with this duty is unlawful. Examples of reasonable adjustments might include:
    - allocating some of the disabled person's duties to a colleague
    - changing their working hours or place of work
    - transferring a learner to another class to accommodate their needs
    - adjusting procedures for assessing job candidates
    - adjusting procedures for assessing new learners and
    - modifying disciplinary and grievance procedures for colleagues and learners.

Harassment and sexual harassment

Harassment is unwanted conduct related to a protected characteristic that has the purpose or effect of:

- violating someone else's dignity; or
- creating an intimidating, hostile, degrading, humiliating or offensive environment for someone else.

Sexual harassment is:

- conduct of a sexual nature that has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment; and
- less favourable treatment related to sex or gender reassignment that occurs because of a rejection of, or submission to, sexual conduct.

You should refer to our Dignity at Work Policy & Procedure, Safeguarding Policy & Procedure and/or our Learner Conduct Policy & Procedure for further information on college procedure for reporting harassment or sexual harassment.

Victimisation

Victimisation is treating another person detrimentally either because that person has made a complaint of discrimination or harassment, or because they have supported someone else who has made such a complaint, for example by giving a witness statement that supports the allegations.

Bullying

There is no legal definition of bullying. However, we regard it as conduct that is offensive, intimidating, malicious, insulting, or an abuse or misuse of power, and usually persistent, that has the effect of undermining, humiliating or injuring the recipient.

Bullying can be physical, verbal or non-verbal conduct. It is not necessarily face to face and can be done by email, phone calls, online or on social media. Bullying may occur at the college or outside of the college.

If the bullying relates to a person's protected characteristic, it may also constitute harassment and, therefore, will be unlawful (see Harassment).

You should refer to our Dignity at Work Policy & Procedure, Safeguarding Policy & Procedure and/or our Learner Conduct Policy & Procedure for further information on college procedure for reporting bullying.

APPENDIX 2

Equity, Diversity and Inclusion Framework

EDI Charter

The college is a member of the Association of Colleges and has signed their EDI Charter which, alongside our EDI Pledge, is published on our website.

The Charter supports our EDI framework, the development of our Action Plan and the work of our Board of Governors, including a named EDI Governor.

EDI Action Plan

The college has developed an EDI Action Plan that is regularly monitored and reviewed by the EDI Forum and Director of Learner Experience (learner EDI lead) and Head of HR (staff EDI lead).

The Action Plan is published as part of the EDI Charter and is refreshed at the beginning of each academic year to ensure the actions are up to date and relevant to the experiences of the college community.