



## **Diversity, Equity & Inclusion Policy**

**Policy Area:** General Corporate

---

**Policy Lead:** Principal & CEO

---

**Approved By:** Governing Board

---

**Date of Approval:** March 2024

## Contents

1. Introduction .....	2
2. East Sussex College Diversity, Equity and Inclusion Statement.....	2
3. Scope.....	2
4. Roles and responsibilities.....	3
5. Forms of discrimination .....	4
6. Students .....	4
7. Special educational needs and disabilities.....	5
8. Disability discrimination.....	6
9. Breaches of the policy: students.....	7
10. Breaches of the policy: staff.....	7
11. Breaches of the policy: governors .....	8
12. Monitoring and review .....	8
13. Information sharing .....	9
14. Other legal duties.....	9

## 1. Introduction

East Sussex College is ambitious for all members of its community students, staff, future students, employers, partners and wider stakeholders. Diversity, equity and inclusion (DEI) is central to the college's core purpose and it will strive to ensure that it proactively promotes inclusion in everything it does. All staff and students must be able to thrive at East Sussex College and feel that they have a fair and equal chance to fulfil their potential. To achieve excellence for the communities that the college serves it needs to continue to nurture talent and embrace diverse experience and perspectives.

East Sussex College will respond to the huge range of needs expressed by students and stakeholders and celebrate the benefits of difference. The college believes that delivering equity, diversity and inclusion is a crucial strand of its approach to overall quality improvement.

East Sussex College is a values-led organisation and diversity, equity and inclusion (DEI) is at the heart of the college's PRIDE values and strategic purpose.

## 2. East Sussex College Diversity, Equity and Inclusion Statement

East Sussex College values diversity and recognises that people with different backgrounds, skills, attitudes and experiences enhance the college community. The college strives to ensure that these differences are celebrated. All members of the college community are expected to work together to create an environment where everyone feels safe, respected and listened to, regardless of their backgrounds.

The college's PRIDE values support the principles of equal opportunities and oppose discrimination. Inequity or discrimination within the college community, based on protected characteristics (age, sex, marriage and civil partnership, gender reassignment, race, disability, sexual orientation, religion or belief, pregnancy and maternity) will not be tolerated. East Sussex College recognises that discrimination may occur due to other non-protected characteristics, such as a person's socio-economic status, which are not explicitly protected by the Equality Act 2010 but to which the college will also take a zero-tolerance approach.

The college will take every possible step to ensure that staff, students and prospective students are treated equally and fairly. All policies and practices will conform with the principles of equal opportunities, particularly in terms of recruitment, admission, selection and discipline.

The college will ensure that it meets its statutory requirements as a minimum and will always seek to exceed and enhance its DEI work through learning from best practice and establishing its own excellent practice standards.

## 3. Scope

This policy applies to the whole of the college's community. This includes all staff, volunteers, governors, students, prospective students, college partners and wider stakeholders.

All members of the college's community have a duty to act in accordance with this policy, to treat every member of the college community with dignity, and not to discriminate against, harass or victimise members of the college community.

In some situations, the college is held responsible for the acts of individual members of the college community and therefore will not tolerate any discriminatory practices or behaviour.

## 4. Roles and responsibilities

### 4.1. The Principal & CEO

The Principal & CEO is responsible for leading the DEI agenda within the college in terms of values and culture and for ensuring that the college meets its legislative responsibilities in respect of quality and diversity.

### 4.2. Governing Board

The Governing Board is responsible for ensuring that the college meets its legislative responsibilities in respect of diversity, equity and inclusion, and for receiving and responding to monitoring information.

### 4.3. Executive team

The Executive team is responsible for monitoring student and staff profiles in respect of protected characteristics.

### 4.4. Senior Leadership Team

The Senior Leadership Team is responsible for ensuring that college staff members are familiar with their roles and responsibilities and the content of this policy. It is committed to providing support and equity and diversity training to promote a positive and inclusive culture for learning and work.

### 4.5. Management

Heads of department and others at a management level all have a specific responsibility to set an appropriate standard of behaviour in line with college PRIDE values, to lead by example and to ensure that those they manage adhere to the policy and promote the aims and objectives of the college with regards to equal opportunities.

For students, this includes promoting equal opportunities with respect to curriculum planning, materials and resources, assessment, role models, teaching and learning methods, management of the environment and social and economic aspects of learning.

For staff, this includes equal opportunities recruitment and selection best practice.

### 4.6. Quality improvement

Curriculum managers and the Quality team are responsible for leading on and reporting on all aspects of DEI. They will ensure that the college meets the needs and interests of all its students by ensuring that it monitor performance, champion excellence and monitor how effective it is at promoting equity and diversity and tackling discrimination. They are also responsible for implementing improvements, in order to identify and narrow any achievement gaps.

### 4.7. People Services

The People Services team is responsible for ensuring that the college complies with the Public Sector Equity Duty in relation to the recruitment, training, development and support of all staff.

### 4.8. Members of the college community

All members of the college community, including staff, students, subcontractors and volunteers are responsible for the success of this policy and their own conduct. All staff should challenge discriminatory behaviour by other members of the college community. Bullying, harassment,

discrimination or any other form of discriminatory behaviour will not be tolerated and must be reported to a college manager.

## 5. Forms of discrimination

### 5.1. Direct discrimination

This occurs where:

- Someone is treated less favourably because of one or more protected characteristics
- Someone is less favourably treated because of their association with someone who has a protected characteristic
- Someone is treated less favourably because they are perceived to have a protected characteristic

### 5.2. Indirect discrimination and indirect associative discrimination

This occurs where an individual is subject to a provision, criterion or practice, applied to a group of people, which puts them at a particular disadvantage because of a protected characteristic, and it cannot be objectively justified. [The Equality Act 2010 \(Amendment\) Regulations 2023 extends this definition to those](#) without a relevant protected characteristic, but who suffer a disadvantage arising from a discriminatory provision, criterion or practice together with persons with the protected characteristic.

### 5.3. Victimisation and harassment

Discrimination also includes victimisation (suffering a detriment because of action a person has taken or may take to assert legal rights against discrimination or to assist another person in that regard (called a Protected Act)) and harassment (see the college's Bullying and Harassment Policy for a more detailed explanation of "harassment").

## 6. Students

### 6.1. Admissions: the college's position

The college aims to ensure that no applicant receives less favourable treatment because of a protected characteristic. Admission and selection procedures will be reviewed regularly to ensure that individuals are treated on the basis of their relevant merits within the college's criteria for selection on grounds of the student's ability and aptitude and in accordance with the college's Access and Participation statement. Selection criteria are reviewed from time to time to ensure that they are justifiable on non-discriminatory grounds as being essential for the effective performance of the job. See the college's Admissions Policy for more information.

### 6.2. Admissions, marketing and promotions

College publicity and student recruitment procedures are designed to encourage applications from all sections of the community and from all levels of ability and are available in a range of formats.

The college will ensure that admission procedures are user friendly and avoid unnecessary barriers to access for prospective students.

The college will continue to identify and respond to learning needs within the student body and will encourage widening participation from the underrepresented, disadvantaged or excluded groups.

The college will make clear its expectations and commitments to equity and diversity in its marketing materials and events, during the student admissions process and again during induction.

Equal opportunities data will be collected, analysed and used to inform the planning and decision-making process of the college's admissions and marketing policies.

**6.3. Education and Student Services: the college's position**

All students will be afforded equal access to all benefits, services, facilities, classes and subjects including all sport, subject to overriding considerations of safety and welfare. The college recognises and is aware of the possibility of bias so that this can be eliminated in both the college's teaching and learning materials and teaching styles.

**6.4. Student interaction**

All students are encouraged to work and interact freely with, and have respect for, all other students. Positive attitudes are fostered towards all groups in society through the curriculum and college ethos, and students will be encouraged to question assumptions and stereotypes.

**6.5. Bullying and harassment**

The college will not tolerate bullying or cyberbullying for any reason. Specific types of bullying related to but not limited to:

- Race, religion, belief or culture
- SEN, learning difficulties or disabilities
- Appearance or health conditions
- Sexual orientation
- Young carers or looked after children or otherwise related to home circumstances
- Sexist or sexual bullying
- Gender reassignment.

The college will use the disciplinary processes for staff or students to address any allegations or breaches of this policy in relation to bullying and harassment.

**6.6. The learning environment**

The college is committed to maintaining and development of learning environments that are welcoming and safe for all students. The college will continue to develop its facilities and accommodation to improve access for students with learning difficulties and/or disabilities.

## 7. Special educational needs and disabilities

**7.1. Students**

**7.1.1. College approach**

The college maintains and drives a positive culture towards inclusion of people with disabilities and learning difficulties and those with special educational needs in all the activities of the college and will not treat a member of the college community less favourably on these grounds. For further information please see the college's SEND Policy.

**7.1.2. Informing the college**

Students (or parents/carers of students if applicable) should notify Student Services if they have a disability or special educational need, or if they become aware of a disability or special educational need while enrolled at the college. This is to enable the college to support all students as much as possible and to ensure that they are not treated less favourably because of something related to their disability.

**7.1.3. Reasonable adjustments**

The college will ensure that reasonable adjustments to assist the provision of education and associated services are planned and delivered. This may include, for example, adjustments to classroom organisation and timetabling; access to college facilities; clubs and visits; college policies. The college will work closely with students and families to carefully consider these arrangements and ensure that they are collaboratively agreed. However, there may be circumstances where it would not be reasonable for the college to accommodate the suggested adjustments and it will ensure that it provides information as to the basis of its decision.

**7.1.4. Physical features**

The college will monitor the physical features of its premises to consider whether it can make any changes to help remove disadvantages which these may create for disabled users. Where possible and proportionate, the college will take steps to improve access for disabled users of the premises.

**7.2. Staff**

**7.2.1. Recruitment and selection: the college's position**

The college aims to ensure that no job applicant receives less favourable treatment because of a protected characteristic. Recruitment procedures are reviewed regularly to ensure that individuals are treated on the basis of their relevant merits and abilities and that sufficiently diverse sectors of the community are reached. Job selection criteria are reviewed from time to time to ensure that they are justifiable on non-discriminatory grounds as being essential for the effective performance of the job. See the college's Staff Recruitment & Selection Policy for more information.

**7.2.2. Training and promotion and conditions of service: the college's position**

Staff training needs are identified through regular Check-Ins as part of the continuous, MyReview performance management process. All staff will be given an equal opportunity and access to training to enable them to progress within the organisation.

**7.2.3. Terms and conditions**

The college's conditions of service, benefits and facilities will be reviewed on an annual basis ensure that they are available to all staff who should have access to them and that there are no unlawful obstacles to accessing them.

## **8. Disability discrimination**

**8.1. Informing the college**

If you are disabled, or become disabled in the course of your employment, you are encouraged to tell the college about your condition. This is to enable the college to support you as much as possible and to ensure that you are not treated less favourably because of something related to your disability.

**8.2. Reasonable adjustments**

You may also wish to advise your line manager and/or the People Services team of any reasonable adjustments to your working conditions or the duties of your job which you consider to be necessary, or which would assist you in the performance of your duties. This may involve the provision of an additional piece of equipment or assistance in helping you to perform your work. Your line manager and/or the People Services team may wish to consult with you and with your medical adviser(s) about possible reasonable adjustments. Careful consideration will be given to any such proposals and they will be accommodated where possible and proportionate to the needs of your job. Nevertheless, there may be circumstances where it will not be reasonable for the

college to accommodate the suggested adjustments and it will ensure that it provides information as to the basis of its decision not to make any adjustments.

**8.3. Physical barriers**

The college will monitor the physical features of its premises to consider whether it can make any changes to help remove disadvantages which these may create for disabled users. Where possible and proportionate, the college will take steps to improve access for disabled users of the premises.

**8.4. Fixed-term employees**

The college will monitor its use of fixed-term employees and their conditions of service, to ensure that they are being offered appropriate access to benefits, training, promotion and permanent employment opportunities. It will, where relevant, monitor their progress within the college to ensure that they are accessing permanent vacancies.

**8.5. Part-time workers**

The college will monitor the conditions of service of part-time employees and their progression to ensure that they are being offered appropriate access to benefits and training and promotion opportunities. It will also ensure requests to alter working hours are appropriately considered.

**8.6. Agency workers**

The college will monitor agency workers to ensure that they are treated no less favourably than a comparable worker in relation to accessing collective facilities and amenities at the college. The college will also monitor the use of temporary work agencies and; subject to the exceptions set out in the Agency Workers Regulations 2010, will ensure that all agency workers have the same basic working conditions they would have been entitled to had they been recruited by the College directly into a comparable role.

## 9. Breaches of the policy: students

**9.1. Complaints**

If you believe that you may have been disadvantaged because of a protected characteristic, you are encouraged to raise the matter through the college's Complaints Policy. If you believe that you may have been harassed because of a protected characteristic, you are encouraged to raise the matter through the college's Bullying & Harassment Policy. Allegations regarding potential breaches of this policy will be treated in confidence and investigated in accordance with the relevant procedure.

**9.2. False allegations**

Students who make such allegations in good faith will not be victimised or treated less favourably as a result, however, false allegations will be dealt with under the Student Management Policy.

**9.3. Disciplinary action**

If, after investigation, you are proven to have engaged in any unwanted conduct because of a protected characteristic, or otherwise acted in breach of this policy, you will be subject to disciplinary action. In serious cases, such behaviour may result suspension or permanent exclusion. The college will always take a strict approach to serious breaches of this policy.

## 10. Breaches of the policy: staff

**10.1. Complaints**

If you believe that you may have been disadvantaged because of a protected characteristic, you are encouraged to discuss the matter informally with your manager or people services in the first



instance. If this fails to resolve the matter or if you do not wish to do so, you should raise the matter through the college's Grievance Policy. If you believe that you may have been harassed because of a protected characteristic, you are encouraged to raise the matter through the college's Bullying & Harassment Policy. Allegations regarding potential breaches of this policy will be treated in confidence and investigated in accordance with the relevant procedure.

#### 10.2. **False allegations**

These procedures apply during and after termination of your employment. Staff who make such allegations in good faith will not face disciplinary action. False allegations of a breach in this policy which are found to have been made in bad faith or vexatiously may, however, be dealt with under the Disciplinary Procedure.

#### 10.3. **Disciplinary action**

If, after investigation, you are proven to have engaged in any unwanted conduct because of a protected characteristic, or otherwise acted in breach of this policy, you will be subject to disciplinary action. In serious cases, such behaviour may constitute gross misconduct and, as such, may result suspension or dismissal. The college will always take a strict approach to serious breaches of this policy.

## 11. Breaches of the policy: governors

#### 11.1. **Complaints**

If you believe that you may have been disadvantaged because of a protected characteristic, you are encouraged to raise the matter through the Director of Governance. If you believe that you may have been harassed because of a protected characteristic, you are encouraged to raise the matter through the Director of Governance. Allegations regarding potential breaches of this policy will be treated in confidence and investigated in accordance with the relevant procedure.

## 12. Monitoring and review

This policy is subject to regular review. The policy and the implementation arrangements which underpin it will be formally reviewed on an annual basis. This review will take into account the views of team members and relevant legislation.

The college monitors the DEI profile of its staff and students by all protected characteristics. Monitoring for students is undertaken by the Quality team. Monitoring for staff is undertaken by the People Services team. Data collected for monitoring purposes will be published on the college's website at least annually and will be reported to the senior leadership team and annually to the Governing Board. The presentation of such information shall observe the college's legal and contractual responsibilities in respect of individual confidentiality particularly in regard of sensitive data and will not identify individuals.

Monitoring at course level is integrated into the programme review process. Student analysis is reported at the internal DEI Committee and into the Executive team and the Curriculum, Standards & Quality Committee.

Student enrolment, retention, and achievement, student survey and complaints are annually monitored by ethnic group, gender, age and disability and the findings are used to inform the Self-Assessment Reviews. Students' views are identified by means of satisfaction surveys, student representatives and the equality and diversity groups.

The following systems are in place to monitor and evaluate the equality and diversity impact of the college's policies:

- The annual Self-Assessment Report (SAR) and Quality Improvement Plan (QIP)
- The termly People Services data dashboards and reports
- Student and staff surveys and focus groups
- Equality analysis
- Equality action plans
- Annual report available on the college website
- Equity, Diversity, & Inclusion Committee minutes
- Annual Gender Pay Gap reporting

### 13. Information sharing

Records created in accordance with this policy may contain personal data. The college has Privacy Notices for staff and students which explain how it will use personal data. Copies of the Privacy Notices are published on the college's website and intranet.

In addition, staff must ensure that they follow the college's General Data Protection (GDPR) Policy when handling personal data created in connection with this policy.

The college collects and processes personal data relating to its students and staff to effectively manage the learning of students and meet its statutory obligations. Information may be collected and shared by the college in order to meet its legal obligations. This may include sharing information collected in accordance with this policy with:

- [The Higher Education Statistics Agency](#)
- [The Education and Skills Funding Agency](#)
- [The Office for Students](#)

The presentation of such information shall observe the college's legal and contractual responsibilities in respect of individual confidentiality particularly in regard of sensitive data and will not identify individuals.

### 14. Other legal duties

In putting this policy into practice, the college will work to meet all other duties introduced under the following laws and regulations and will be ready to implement future legislation in this area.

- [The Equality Act 2010](#)
- [Rehabilitation of Offenders Act 1974](#)
- [The Protection from Harassment Act 1997](#)
- [Human Rights Act 1998](#)
- [The Equality Act 2010 \(Amendment\) Regulations 2023](#)