



Westford University College (WUC)

Equality and Diversity Policy

Revised March 2020

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| Name of Document: | Equality and Diversity Policy |
| Current version: | 1 |
| Date of last review: | 9 March 2020 |
| Last review by: | Head of Academic Development |
| Policy owned and approved by: | Quality and Standards Committee |
| Next review due date: | April 2021 |

1 Equality and Diversity Policy

Purpose

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

To provide an Equality and Diversity Policy that supports co-ordination and implementation at a strategic level, reflects Westford University College (WUC) core values; and is embedded within appropriate College policies for staff and students.

2 QAA UK Quality Code

This Policy incorporates the following guiding principles set out in the Advice and Guidance for Admissions, Recruitment and Widening Access:

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

Advice and Guidance for Learning and Teaching ensures that:

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

3 QAA Advice and Guidance for Enabling Student Achievement, endorsed by WUC is as follows:

- 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;
- training and resources are allocated to student support services to enable effective delivery, ensure comprehensive evaluation and subsequent development;

- clear, consistent and accessible communication about opportunities and support available to students from pre-entry through to completion and beyond;
- equality of opportunity for all students to develop academic and professional skills;
- provide an accessible, inclusive and engaging community that incorporates staff and students to facilitate a supportive environment;
- actively seek the feedback and engagement of students and staff to ensure continuous improvement of the learning environment

4 Equality and Diversity Policy Statement

Westford University College (WUC) 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. Westford University College (WUC) 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. Westford University College (WUC) 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 a positive working environment for both students and staff.

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

Westford University College (WUC) values diversity and recognises that the college is greatly enhanced through the wide and disparate range of backgrounds, experiences, views, beliefs and cultures represented within its staff and student groups. The college aims to embrace diversity in all of its activities and proudly acknowledges that variety and difference are intrinsic to the wellbeing and future development of the College.

The College Equality and Diversity Policy underpins the college Mission and Strategic Plan. The 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.

5 Westford University College (WUC)'s Strategic Plan

The College Strategic Plan 2020-23 provides the following guiding value statements for Westford University College (WUC) on Equality and Diversity:

- the college will focus on providing academic and professional education for students globally based on secure academic standards, high quality learning opportunities and meeting employer needs within a transformative independent education sector in the UAE;
- the college will provide a student experience of the highest quality and with quality enhancement embedded in all we do including valuing opportunity, diversity and inclusiveness;
- we will enable a culture of professionalism openness, empowerment, responsibility and excellence while rewarding success and learning to do better;
- we will provide an inclusive learning and teaching environment to our staff members and students via our innovative online platform;
- we will have a proactive and innovative approach in responding to challenges in a rapidly changing world, performance through valuing staff and continuous staff development;
- we will focus on sustainability, value for money and adding value in all aspects.

The second, third and fourth of these value statements relate directly to equality and diversity and directly inform this Equality and Diversity Policy.

6 Objectives of the Equality and Diversity Policy

Westford University College (WUC) is committed to ensuring that an environment is created that respects the diversity of staff and students and enables them to achieve their full potential. To achieve these objectives the following basic rights for all existing and future staff and students are acknowledged: to be treated with respect and dignity; to be treated fairly with regard to all policies, procedures, assessments and related activities; and to be encouraged to reach one's full potential.

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: eliminating unlawful discrimination; harassment and victimisation; advancing equality of opportunity across all activities of the College; and fostering good relations between people of a diverse background.

Through implementation of this policy, Westford University College (WUC) aims to:

- develop and promote a culture of equality and diversity throughout the College;
- develop and promote a culture of dignity, courtesy and respect;
- 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;
- work to prevent all forms of unlawful discrimination;
- deal with all forms of discrimination consistently and effectively;
- ensure that this Equality and Diversity Policy influences and informs culture.

Westford University College (WUC) 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.

7 Roles and Responsibilities

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

Role of Staff: Staff members at Westford University College (WUC) 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, the Equality and Diversity Policy; to support the objectives and aims of the College's Equality and Diversity Policy; and to undertake appropriate equality and diversity training.

Role of Students: Students at Westford University College (WUC) have the following responsibilities with respect to adherence to the Equality and Diversity Policy: to actively encourage non-discriminatory practices and to report any incidences of behaviour that fails to comply with this Policy; to be aware of, and support, the Equality and Diversity Policy; to support the aims and objectives of this Equality and Diversity Policy; and to be aware of equality and diversity issues.

Role of Human Resources Department

The Human Resources Department at Westford University College (WUC) has the following responsibility with respect to supporting the Equality and Diversity Policy: to provide appropriate equality and diversity awareness and training to staff to support the Head 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.

Role of Senior Management

Senior management of Westford University College (WUC) include the Board of Directors, Chief Executive Officer, Academic Director, Head of Delivery, Head of Standards and Quality Enhancement and Head of Operations. With respect to this Equality and Diversity Policy, the responsibility of senior management are:

- to ensure that 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.

8 Application of the Equality and Diversity Policy: Staff

Recruitment and Selection: Recruitment and 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.

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

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

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

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.

Application of the Equality and Diversity Policy: Students

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.

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

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.

Application of the Equality and Diversity Policy: Visitors, Contractors and Sub-Contractors

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

9 Additional considerations

Training

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.

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.

Communication

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.

10 Breach of Westford University College (WUC)'s Equality and Diversity Policy

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.

11 Data Collection and Monitoring

The personal data of students and staff are collected and used in accordance with the Data Protection Act 2018. The Head of Delivery, Head of Standards and Quality Enhancement and Admissions Officer 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 team members at Westford University College (WUC) monitor student enrolment, retention, achievement and success at appropriate points throughout the academic year.

Evaluative reports, such as the Annual College and Course Review, Quality Monitoring Report and Awarding Bodies/Partner Universities' Annual Monitoring Report, External Examiner 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.

The College's Academic Board and Senior Leadership Team are responsible for monitoring equality and diversity data relating to students and the Human Resources Officer is responsible for monitoring equality and diversity data for staff.

12 Relevant aspects of the (revised) UK Quality Code

Expectations for Quality: Core Practices

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.

Common Practices

The provider reviews its core practices for quality regularly and uses the outcomes to drive improvement and enhancement.

The provider engages students individually and collectively in the development, assurance and enhancement of the quality of their educational experience.

[Note: The Provider in this context is Westford University College (WUC)]

12.1 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. 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 26 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:

- avoid the substantial disadvantage where a provision, criterion or practice puts disabled students at a substantial disadvantage compared to students who are not disabled;
- 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;
- 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 man or woman.

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.

12.2 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.

12.3 Appendix 3: Examples of Discrimination, Harassment and Victimisation

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.

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.

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.

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.

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.

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.