



Equity, Diversity and Inclusion Policy

Our pledge:

- To ensure that our commitment to equity, diversity and inclusion is embedded in our organisation and is experienced by all our staff, students, volunteers, governors, customers and visitors.
- To promote a culture of mutual respect and understanding, and to continually review our policies and strategies to ensure that they support this pledge.
- To ensure that the Chichester College Group (the Group) is free from discrimination, victimisation, harassment and bullying.
- To ensure that CCG is a vibrant, diverse, and inclusive community.
- To ensure that CCG meets its commitments under the Equality Act 2010 in relation to staff, students, visitors and Governors.

Our E, D and I Commitments

- (1) To demonstrate leadership in this regard through the EDI Steering Committee, chaired by the Executive Principal and Deputy Chief Executive, which reports into the Group Leadership Team directly.
- (2) To act within the principles set out in the AOC Equity, Diversity and Inclusion Charter.
- (3) To act with integrity and within our values.



Policy schedule

1. Scope of this policy

1.1 This policy applies to all staff, Governors, students, customers, volunteers, workers supplied by agencies, and contractors. The policy applies to all processes relating to employment, education and training and interactions with staff, students, customers and contractors.

2. Recruitment

2.1 The CCG recruitment and selection policy contains a detailed account of how we recruit and select staff in keeping with this policy.

2.2 The Group and college websites also set out our commitment to Equity and Diversity, sharing our practice, providing open and transparent access to our gender pay data and setting out our action plans. We also include our pledges in relation to recruiting staff with disabilities, the armed services covenant and our signing up to the anti-Semitism definition as established by the International Holocaust Remembrance Alliance.

3.0 Making reasonable adjustments

3.1 If a member of staff has a long-term health condition, considers themselves to be disabled, or has become disabled in the course of their employment, the first step is to notify the organisation (either through HR or directly via line management).

3.2 This is to enable us the Group to support you staff and eliminate any barriers as far as reasonably possible, and to ensure that staff are not treated less favourably because of something related to a disability.

3.3 There are multiple opportunities to discuss such matters with a line manager. This can be done at regular one to one meetings, or as part of Probation review or appraisal meetings.



3.4 Adjustments or changes can take many forms, including the provision of an additional piece of equipment or software, or changes to working practices.

3.5 Reasonable adjustments discussions take place between the member of staff, their line manager and HR working together, and may also include the involvement of the Additional Support teams and / or a medical adviser. For more information, please see the “Declaring a disability” policy on the staff intranet.

4. Supporting staff and students with mental health concerns

4.1 We recognise that many of our staff and students will experience a period of mental ill health at some point in their lives. We have a supportive framework in place, including a range of in-house and external counselling options for students and external counselling support for Staff.

4.2 Please see the Wellbeing pages on the intranet for more details.

5. Part time and fixed-term employees

5.1 The Group will monitor the terms and conditions of service for part time and fixed term employees to ensure that they are being offered appropriate access to benefits, training, promotion and permanent employment opportunities.

6. Staff experiencing the menopause

6.1 CCG is committed to supporting staff experiencing menopause. We have specific guidance to support staff experiencing the menopause and a range of practical support tools in place. For information, please see the staff intranet sites or talk to a member of the HR team.

7. Agency workers



- 7.1 The Group 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.
- 7.2 The Group 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 Group directly into a comparable role.

8. Pay

- 8.1 CCG is committed to the principle of Equal pay for equal work. The group has a job evaluation scheme which underpins all pay decisions. Full information about this can be found in the Pay Policy.
- 8.2 The Group undertakes a Gender Pay Gap analysis on a regular basis, carried out a Gender Pay Gap analysis and ensures that all major pay changes are subject to an Equalities Impact Assessment.

9. Concerns and complaints

- 9.1 Where complaints are raised about behaviours, actions or words which do not meet the expectations set out in this policy, these will be investigated as follows:

Students: This will be managed via the Positive Behaviour Management policy.

Staff: Staff can raise a grievance using the CCG Grievance policy (including bullying and harassment) if they are subject to behaviour which falls outside of the expectations of this policy. In addition, any member of staff found to be acting in breach of this policy will be managed in line with the Group's Disciplinary policy.



10. Taking additional (positive) action

10.1 From time to time, the Group may decide that proportionate positive action is taken where there is evidence that participation is disproportionately low for people who share a protected characteristic, where they experience a disadvantage or in order to meet their different needs.

10.2 For example, this could include advertising roles in a particular market to attract particular candidates based on a protected characteristic, or adding positive promotional images of male students in traditionally female dominated subjects to course material.

11. Monitoring and review

11.1 The Group sets annual diversity goals and has a steering group to oversee that the group continually works to achieve its diversity ambitions.

11.2 The Group monitors the profile of its students and staff by gender, age, race, sexual orientation, marital status, disability and ethnicity.

11.3 Monitoring at course level is integrated into the regular Quality reviews.

11.4 Student enrolment, retention, and achievement, student survey and complaints are monitored termly, and the findings are used to inform the annual Self-Assessment Reviews. Students' views are identified by means of satisfaction surveys, student representatives and the EDI groups.

11.5 Monitoring for staff is undertaken by the HR team. This is carried out using information held on the Group HR system, as well as other data, such as the annual staff survey. Data collected for monitoring purposes will be published on our website at least annually and will be reported to the senior leadership team and annually to the Board of Governors. An annual staffing report is published on our website. This reporting will also meet the Group's legal and contractual responsibilities.



12. Status of this Policy

The operation of this policy will be kept under review by the Director of Human Resources in conjunction with GLT. It may be reviewed and varied from time to time by the Resources Committee. It has been equity impact assessed to ensure it does not adversely affect staff. If you would like to review this information in a different format, please contact Human Resources.

Name of Policy	Equity, Diversity and Inclusion
Approved by	Resources Committee October 2022 <i>Pending: 14th May 2026</i>
Next review date	July 2025



APPENDICES

Appendix 1: How our values shape us in action

Learning and support are our prime focus

- We will listen and learn from staff and students who raise concerns about diversity we will not be complacent when any concerns are raised.
- We will encourage staff to share ideas so that we can learn from their lived experiences.
- We will provide training for all staff, Governors and students in diversity and inclusion, so that they understand the importance and benefits of an inclusive setting, and they are equipped to carry out their responsibilities under this policy.

Kindness and compassion at the heart of all we do

- We aim to be an Employer where individual differences are appreciated, celebrated and all contributions are valid.

Excellence in all that we do

- We want to be a College Group where diversity is rooted in everything we do; in every learning intervention that we deliver, in every meeting and interview that we schedule; in our decision-making and in our communications.
- We will take steps to remove or avoid all forms of unlawful discrimination on the grounds of age, disability, gender, race, religion or belief, sexual orientation, gender reassignment, pregnancy and maternity, marriage and civil partnership.
- We will work to be free of bullying, harassment, victimisation and unlawful discrimination.
- We will take preventative action to ensure our workplace and our learning environments are free from sexual harassment.
- We will provide appropriate training to support our ambitions and enable a culture which recognises and values diversity of thinking and individuality.

Trust, respect and integrity

- We will thoroughly investigate any complaints of bullying, harassment, victimisation and unlawful discrimination. (See the complaints section for more information).



- We will review our practices and procedures as necessary to ensure that they are non-discriminatory, and that they reflect the latest ‘best practice’ position.
- We challenge instances of discrimination or prejudice.

Opportunities for all

- We will ensure that our recruitment, training and promotion processes are fair and transparent. (See the Recruitment Policy and Our DBS policy for details).
- We will carry out equality impact analyses before any significant change is implemented or when we are establishing or reviewing policies, procedures, practices, plans and activities.
- We will work with staff and students who have a disability to make any reasonable adjustments to the building or working practices to ensure accessibility. (For more information, please see the Reasonable Adjustment policy).
- We will train managers to ensure that they understand how bias (conscious and unconscious) can work and so that they make fair and transparent recruitment decisions. We will also ensure that promotion opportunities are advertised and open to all. (See the Recruitment Policy for more details).
- We will ensure that students receive fair and equitable treatment in relation to admission, administration and assessment procedures.

Celebrating our vibrant, inclusive community

- We have established staff groups where staff can share experiences and where they can help the organisation meet the needs of all its staff and students.
- We will celebrate the talent and diversity of our workforce and students through regular events and activities.
- We produce an annual report setting out the actions taken in the previous year and celebrating our diversity. These are published on our website.



Appendix 2: Roles and responsibilities

- a. The Executive Principal and Deputy Chief Executive has overall responsibility for this policy and chairs the Steering Group.
- b. Governors are responsible for ensuring that:
 - They are aware of the Governing Body's statutory responsibilities in relation to equality legislation as an employer and a service provider;
 - the membership of the Governing Body strives to reflect the diversity of the communities served by the Group;
 - they respond to monitoring information on staff, students and applicants and agree a course of action.
- c. The Group Leadership Team (GLT) is responsible for ensuring that:
 - A positive, inclusive ethos is created encouraging feedback;
 - all policies and procedures are equality impact analysed;
 - procedures for challenging all forms of discrimination, harassment, victimisation and unacceptable behaviour are widely promoted;
 - business communications reinforce the inclusive messages and become incorporated into day-to-day processes;
- d. Managers are responsible for ensuring that:
 - They are aware of the Group's statutory duties and the Equity, Diversity and Inclusion policy and associated policies and procedures are implemented fairly in their area of responsibility;
 - they lead by example and challenge inappropriate language and behaviour by students, staff, Governors, volunteers, visitors, partner contractors, work placement providers, support workers, teaching assistants accompanying learners and other contractors and users of the Group's services;
 - curriculum activities actively incorporate equity and diversity issues;
 - staff induction, continuous professional development and performance management reflect the Group's commitment to equality of opportunity;
 - they provide teaching, learning and assessment methods, support and resources that meet the individual needs of students and staff.



e. Staff are responsible for ensuring that:

- They understand, uphold and engage with the Group policy on equity, diversity and inclusion by role modelling this behaviour.
- Inappropriate language or behaviour is challenged, and unacceptable behaviour is reported;
- Where teaching, they provide teaching, learning and assessment methods, support and resources that meet the individual needs of students and colleagues.

f. Students are responsible for ensuring that:

- They adhere to the Group's core values and treat all members of the Colleges' community with respect;
- they support the Equity, Diversity and Inclusion policy;
- they contribute to a learning environment that celebrates the diversity within the environment and that of their wider communities.
- They create a learning environment where it is safe for them to challenge bullying, harassment, victimisation, discrimination and micro aggressions.



Appendix 3 - Further information

The Equality Act

The Equality Act 2010 forms the basis of this policy, which defines the protected characteristics as:

- Age
- Gender
- Religion and belief
- Gender reassignment
- Marriage and civil partnerships
- Disability
- Race
- Sexual orientation
- Pregnancy and maternity

Whilst all nine characteristics apply in the employment duties of the Act, the characteristic of marriage and civil partnerships is not included in the education duties of the Act.

Types of discrimination

Direct discrimination

Direct discrimination occurs when someone is treated less favourably than another person because of a protected characteristic (age, disability, gender, race, religion or belief, sexual orientation and gender reassignment) they have or are thought to have (see perceptive discrimination below).

Associative discrimination

Applies to age, disability, gender, race, religion or belief, sexual orientation and gender reassignment. This is direct discrimination against someone because they associate with another person who possesses a protected characteristic.



Perceptive discrimination

This is direct discrimination against an individual because others think they possess a particular protected characteristic (see above). It applies even if the person does not actually possess that characteristic.

Indirect discrimination indirect discrimination is when:

- there's a policy, practice or rule which applies to everybody in the same way, but
- it places people who share a protected characteristic at a disadvantage
- The organisation or person applying the policy, practice or rule can't show there's a good enough reason for it (this is known as a proportionate means of achieving a legitimate aim'.

Indirect discrimination can be justified if it can be shown that the organisation acted reasonably, i.e. that it is a proportionate means of achieving a legitimate aim. If the 'legitimate aim' is solely with the aim of reducing costs, it is unlikely on its own to meet the test of being reasonable and proportionate.

Failure to make reasonable adjustments

This occurs when an establishment fails to consider whether reasonable adjustments can be made to allow someone with a disability to use services/facilities or undertake employment.

Harassment

Harassment occurs when someone engages in unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment and where such conduct could reasonably be considered as having that effect.



Harassment is not dependent on an intention to cause distress or hurt but is assessed by the impact the behaviour has on the recipient (even if it is not directed at that individual); provided that it is reasonable in the circumstances to consider that the conduct in question constitutes harassment. As a result, it is possible that behaviour that is acceptable to some members of staff will cause embarrassment, distress or anxiety to others.

Harassment applies to all protected characteristics except for pregnancy and maternity and marriage and civil partnership. Members of staff will now be able to complain of behaviour that they find offensive even if it is not directed at them, and the complainant need not possess the relevant characteristic themselves. Members of staff are also protected from harassment because of perception and association. Unlawful discrimination on the grounds of the Equality Act protected characteristics will not be tolerated in any form.

Harassment can take many forms, which may include, but is not limited to:

- Unnecessary or unwanted physical conduct ranging from touching to serious sexual or physical assault;
- Verbal conduct such as sexist, racist or homophobic comments or innuendo, derogatory remarks about protected characteristics, comments of a personal nature, suggestive remarks, inappropriate jokes or language;
- Display, storage or circulation of offensive material (including information held on computer).

Harassment is normally characterised by more than one incident of unacceptable behaviour, particularly if it reoccurs once it has been made clear by the victim that they consider it offensive. A single incident may constitute harassment however, if it is sufficiently serious.



Victimisation

Victimisation occurs when an employee is treated badly because they have made or supported a complaint or raised a grievance under the Equality Act; or because they are suspected of doing so. An employee is not protected from victimisation if they have maliciously made or supported an untrue complaint.

Bullying

Bullying is not dependent on an intention to cause distress or hurt but is assessed by the impact the behaviour has on the recipient (even if it is not directed at that individual); provided that it is reasonable in the circumstances to consider that the conduct in question constitutes bullying. As a result, it is possible that behaviour that is acceptable to some members of staff will cause embarrassment, distress or anxiety to others.

It is usually persistent, offensive, abusive, intimidating, malicious or insulting behaviour or unfair use of sanctions by one person towards another, which has the purpose, or effect, of intimidating, belittling or humiliating the recipient, leading to a loss of self-esteem.

Bullying is recognised as a serious management issue and is often unreported.

People affected by bullying often feel the matter appears trivial or that they may have difficulty in describing it. Examples of bullying may include, but are not limited to:

- Persistent unnecessary criticism;
- shouting at colleagues in public or private;
- deliberate isolation by ignoring or excluding a person;
- withholding information or removing areas of responsibility without justification;
- spreading malicious rumours or making inappropriate personal comments;
- undermining a person's self-respect by condescending or threatening treatment that humiliates or intimidates the individual;
- cyber bullying (e.g. by email, text or through social networking sites);
- picking on one person when there is a common problem;



- setting unrealistic targets or excessive workloads; setting an individual up to fail (e.g. by giving inadequate instructions or unreasonable deadlines).

Sexual Harassment

Sexual harassment is any unwanted, unsolicited behaviour of a sexual nature that violates an individual's dignity or creates an intimidating, hostile, degrading, or offensive environment.

It can be physical, verbal, or non-verbal, occurring in person or online (e.g. email, social media), and it is not defined by intent, but by the impact on the recipient.

Micro aggressions:

Microaggressions are defined as the everyday, subtle, intentional or unintentional statements, actions or behaviours that communicate some sort of bias toward historically marginalized groups. An example of a micro aggression would be touching a black member of staff's hair without consent.