

# Equality, Diversity and Inclusion Policy

# Index

<b><u>1.</u></b>	<b><u>Introduction</u></b>	<b><u>3</u></b>
<b><u>2.</u></b>	<b><u>Commitment to equality, diversity and inclusion</u></b>	<b><u>3</u></b>
<b><u>3.</u></b>	<b><u>Aims</u></b>	<b><u>4</u></b>
<b><u>4.</u></b>	<b><u>Responsibility</u></b>	<b><u>4</u></b>
<b><u>5.</u></b>	<b><u>Implementation and enforcement</u></b>	<b><u>5</u></b>
<b><u>6.</u></b>	<b><u>Discrimination</u></b>	<b><u>5</u></b>
<b><u>7.</u></b>	<b><u>Application of the policy: Staff</u></b>	<b><u>6</u></b>
7.1	Recruitment and selection	6
7.2	The workplace	6
7.3	Support mechanisms	6
7.4	Grading and promotion	7
7.5	Staff development	7
7.6	Performance management	7
7.7	Discipline and grievance	7
<b><u>8.</u></b>	<b><u>Application of the policy: Students</u></b>	<b><u>7</u></b>
8.1	Recruitment, selection and admission	7
8.2	Support mechanisms	8
8.3	Assessment	8
8.4	Career planning and engagement	8
8.5	Discipline and student complaints	8
<b><u>9.</u></b>	<b><u>Related regulations, policies and procedures</u></b>	<b><u>8</u></b>
<b><u>10.</u></b>	<b><u>Review of Equality, Diversity and Inclusion Policy</u></b>	<b><u>9</u></b>

## Document Version Control

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The Equality, Diversity and Inclusion Policy will be reviewed annually by our Senior Management and Leadership Team (SMLT). Any amendments require the approval of our Board of Directors.

# 1. Introduction

We are committed to creating and sustaining a positive and mutually supportive environment where all staff and students are equally valued and respected, and encouraged to thrive. We value the diversity within our academic community and the huge range of experience and perspective that this brings. The appreciation of diversity and the equitable treatment of all are among our core values, underpinning our success as a community of scholars. We measure our commitment to the above through an annual statistical analysis of our staff and student body which helps to inform our Access and Participation Statement<sup>1</sup>.

We are committed to promoting and advancing equality, diversity (and an equal society) and inclusion as key features within all our activities, as we believe this to be ethically right and socially responsible. It is also crucial in the context of our Prevent duties since by treating all equally and making them feel included we are mitigating the risk of radicalisation<sup>2</sup>. Equality, diversity and inclusion are essential factors that contribute to the academic and economic strengths of our institution. We therefore strive to look beyond our legal obligations, as set out in the Equality Act 2010, in order to embed equality, diversity and inclusion within our organisational culture for the benefit of staff, students and applicants irrespective of whether or not they share any of the characteristics protected under the Act<sup>3</sup>. In this way we aim to create an equal society that:

- protects and promotes equal, real freedom and substantive opportunity to live in the ways people value and would choose, so that everyone can flourish
- recognises people's different needs, situations and goals and removes the barriers that limit what people can do and can be
- recognises, respects and values the differences between individuals whether these differences be visible or non-visible

## 2. Commitment to equality, diversity and inclusion

We believe that excellence will be achieved through recognising the value of every individual. We aim to create an environment that respects the diversity of staff and students and enables them to attain their full potential: to contribute fully, and to derive maximum benefit and enjoyment from their involvement in the life of the institution.

To this end, we acknowledge the following basic rights for all members and prospective members of our community:

- to be treated with respect and dignity;
- to be treated fairly with regard to all procedures, assessments and choices; and
- to receive support to attain their full potential.

No individual will be unjustifiably discriminated against. This includes, but not exclusively, on the basis of gender, race, nationality, ethnic or national origin, religious or political beliefs, disability, marital status, social background, family circumstance, sexual orientation, gender reassignment and age.

In order to ensure that we continue to operate with equality, diversity and inclusion at the heart of our activities, we have established an 'Equality, Diversity and Inclusion Team' (EDIT), comprising staff and

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<sup>1</sup> Within our student body, we have a fairly balanced ratio of men to women, but unusually for a Higher Education Institution, our student body spans a broad age range. In addition, we have a high proportion of BAME students and also students with a disclosed disability/medical condition of some sort.

<sup>2</sup> Our Prevent duties focus on eliminating radicalisation on campus. Inclusion is crucial to minimising radicalisation.

<sup>3</sup> The protected characteristics are age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership and pregnancy and maternity.

student representation as well as external representation, which has detailed terms of reference (available upon request from [edit@lsbm.ac.uk](mailto:edit@lsbm.ac.uk)). The team also provides staff and students with a confidential forum for them to raise any equality and diversity issues or concerns they might have. The team can be contacted at [edit@lsbm.ac.uk](mailto:edit@lsbm.ac.uk). In addition, we have made the Equality, Diversity and Inclusion Policy one of the core essential documents that staff have to download from HR Online<sup>4</sup> upon joining our organisation. The same is also true of our Dignity and Respect in the Workplace document. Equality, diversity and inclusion issues are also covered in the Student Guide which is circulated to all students at the start of their course.

### 3. Aims

We aim to:

- review on an ongoing basis<sup>5</sup> our current policies and procedures from an equality, diversity and inclusion perspective with a view to agreeing an action plan and objectives (both of which will be available from [edit@lsbm.ac.uk](mailto:edit@lsbm.ac.uk)).
- establish on an annual basis a staff and student profile in the context of the protected characteristics. The purpose of this is to identify and assess any notable findings with a view to addressing any issues
- continue to signpost the importance of equality, diversity and inclusion at our institution by including coverage on our website and in our staff and student publications.
- ensure that Equality and Diversity training is included within our staff training programme
- continue to ensure staff and student support services are, as far as reasonably possible, accessible to all

### 4. Responsibility

The rights set out within this Equality, Diversity and Inclusion Policy carry with them responsibilities and we require all members of our community to recognise these rights and to act in accordance with them in all dealings with fellow members of the institution. The commitment of all members of our community is required to make the policy a success.

Our Board of Directors has overall responsibility for ensuring that we operate within a framework of equality of opportunity. This is clearly articulated in our Articles of Association and Corporate and Academic Governance Framework (CAGF) with the latter listing the following particular responsibilities:

- approving the Equality, Diversity and Inclusion Policy
- receiving details of the EDIT Staff Training Programme (for information)
- approving the EDIT Annual Report

In addition, the CAGF stipulates specifically the need for the EDIT Annual Report to cover details of our arrangements to:

- eliminate unlawful discrimination, harassment and victimisation

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<sup>4</sup> HR Online is the LSBM internal Human Resources website, and it can be accessed, under a personal username and password, at [https://lsbm.breathehr.com/employees/sign\\_in](https://lsbm.breathehr.com/employees/sign_in).

<sup>5</sup> The review will take place at least once a year.

- advance equality of opportunity between people who do and do not share a protected characteristic
- foster good relations between people who share and those who do not share a protected characteristic

However, it is our Equality, Diversity and Inclusion Team (EDIT) that is responsible for reviewing this policy and presenting any amendments to the Senior Management Leadership Team for recommended approval by the Board of Directors. The EDIT will, from time to time, supplement this policy with codes of practice or guidelines on behaviour (e.g. our Unconscious Bias Guidance Notes) following approval from the SMLT which has operational oversight responsibility of the EDIT in terms of facilitating developments and communicating responsibilities to our staff and students.

## 5. Implementation and enforcement

We are committed to promoting a general culture of equality, diversity and inclusion throughout our staff and student community.

This Equality, Diversity and Inclusion Policy is enforceable by the institution, our staff and our students. Any complaint which alleges non-compliance with our Equality, Diversity and Inclusion Policy will be taken seriously and dealt with in a timely and sensitive manner, in accordance with the appropriate complaints procedure.

Any breach of this Equality, Diversity and Inclusion Policy will be regarded as misconduct and will be dealt with in accordance with the appropriate disciplinary procedure.

This Equality, Diversity and Inclusion Policy is available to our staff and students (and potential staff and students) both in hard copy and electronic copy. If you require this document in an alternative format, please contact our Disability and Wellbeing Advisor at [disability@lsbm.ac.uk](mailto:disability@lsbm.ac.uk) or call +44(0) 207 078 8840.

## 6. Discrimination

Under the Equality Act, it is unlawful to discriminate, harass or victimise someone because they have or are perceived to have a 'protected characteristic' or are associated with someone who has a protected characteristic. There are a number of different types of discrimination<sup>6</sup>.

**Direct Discrimination:** this means treating someone less favourably than someone else because of

- a protected characteristic they possess – this is ordinary direct discrimination; and/or
- a protected characteristic of someone they are associated with, such as a friend, family member or colleague – this is direct discrimination by association; and/or
- a protected characteristic they are thought to have, regardless of whether this perception by others is actually correct or not – this is direct discrimination by perception.

**Indirect Discrimination:** this is where a provision, criterion or practice is applied equally to a group of employees/job applicants, but has (or will have) the effect of putting those who share a certain protected characteristic at a particular disadvantage when compared to others without the characteristic in the group, and the employer is unable to justify it.

**Failing to make reasonable adjustments:** this means treating a person with a disability unfavourably because of something connected with their disability when this cannot be justified objectively.

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<sup>6</sup> The following definitions are provided by a guidance note issued by ACAS.

**Harassment:** this is unwanted behaviour related to a protected characteristic which has the purpose or effect of violating someone's dignity or which creates a hostile, degrading, humiliating or offensive environment.

**Victimisation:** is treating someone unfavourably because they have taken some form of action relating to the Equality Act, e.g. made a complaint under the Act or supported someone who is doing so, such as appearing as a witness.

## **7. Application of the policy: Staff**

### **7.1 Recruitment and selection**

Detailed information on how we apply our commitment to equality and diversity to the recruitment and development of staff can be found in our Staff Recruitment and Development Policy. However, the key areas to note from the policy are as follows:

- Recruitment advertising will encourage applications from all sectors of the community reflecting our commitment to equality and diversity. Recruitment advertising will also 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. Our Disability and Wellbeing Advisor will review Job Descriptions and Person Specifications before finalisation in order to identify and address any issues that might prevent or deter disabled people from applying for the job. Shortlisting, appointment and rejection decisions will be transparent and justifiable and will be supported by written comments. Members of all shortlisting and interview Panels will be required to read our Unconscious Bias Guidance Notes<sup>7</sup>.
- If a disabled applicant meets the essential criteria for the job (as set out within the Person Specification), they will be provided with the opportunity to demonstrate their abilities at an interview under our Guaranteed Interview Scheme.

### **7.2 The workplace**

The principles of dignity and respect at the heart of our Equality, Diversity and Inclusion Policy are embraced within our Dignity and Respect in the Workplace document. This, like the Equality, Diversity and Inclusion Policy, is one of the key company documents that all staff are required to read. It acknowledges a number of basic rights and responsibilities for all members and prospective members of our academic community including a right to be treated with respect and dignity, as well as a right to be treated fairly and without discrimination.

Dignity and respect is a theme revisited in our Ethics Policy. The latter states very simply that there is a requirement to “treat all people with dignity and respect and ensure that nobody is treated less favourably because of a protected characteristic, or because of their social or economic background, or for any other reason.” In addition, articulated within the policy is a requirement for our academic community to work to “promote and achieve a culture free of discrimination”.

### **7.3 Support mechanisms**

The HR Manager and the Disability and Wellbeing Advisor are available to provide staff with any support that they might need if the necessary adjustments are deemed reasonable. Any requests for support will be treated in confidence.

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<sup>7</sup> Members of Complaints Panels, Disciplinary Panels etc will also be required to read the Unconscious Bias Guidance Notes in the interest of equitable treatment.

Information on the disability support available can be found at [www.lsbm.ac.uk/disability-office](http://www.lsbm.ac.uk/disability-office). Alternatively, staff can book an appointment with the Disability Wellbeing Advisor by emailing [disability@lsbm.ac.uk](mailto:disability@lsbm.ac.uk).

Information on benefits available to those with parental duties can be found in our Leave Policy (available from HR Online<sup>8</sup>).

Staff members also have access to a 24-hour confidential support service via the Employee Assistance Programme (EAP) which provides a range of services including telephone counselling, personal legal advice and financial information, and health advice. The service can be accessed at [www.colleaguesupport.co.uk](http://www.colleaguesupport.co.uk).

## **7.4 Grading and promotion**

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

## **7.5 Staff development**

All staff will have equal access to induction, personal and career development opportunities and facilities. A Staff Induction Checklist is followed for each new appointee to ensure that all staff receive the information they need to support them in their respective roles and career development. In addition, each staff member has an annual allowance of £500 to cover continuing professional development needs.

All staff members are required to complete ACAS online training on Equality and Diversity, and Bullying and Harassment within their first three months of employment with LSBM, as well as an eQuality Learning online Disability Awareness training course.

## **7.6 Performance management**

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

## **7.7 Discipline and grievance**

Staff who make a complaint of discrimination have the right to do so without fear of victimisation and we will make every effort to ensure victimisation does not occur.

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

# **8. Application of the policy: Students**

## **8.1 Recruitment, selection and admission**

We welcome applications from disabled people and those with long-term medical conditions and specific learning difficulties, and are committed as far as possible to providing them with the support they need to realise their potential and succeed. This commitment is articulated in detail within our Disability Policy.

We will not deny an applicant the opportunity to better their life through education on the grounds that the applicant has a criminal conviction. Consequently, in the interest of social justice and in order not

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<sup>8</sup> HR Online is the LSBM internal Human Resources website, and it can be accessed, under a personal username and password, at [https://lsbm.breathehr.com/employees/sign\\_in](https://lsbm.breathehr.com/employees/sign_in).

to deter an applicant with a criminal conviction from making an application, we do not require the disclosure of criminal convictions. The decision about whether or not to make an applicant an offer of a place on one of our courses will therefore not be influenced by an applicant's criminal convictions.

All staff involved in the recruitment, selection and admission of students will receive appropriate training. This includes, for example, the Supporting Professionalism in Admissions Unconscious Bias training, and ACAS training on Equality and Diversity.

## **8.2 Support mechanisms**

The Disability and Wellbeing Advisor is available to provide students with any reasonable support that they might need. Detailed information on the reasonable adjustments a student could expect us to provide can be found in our Disability Policy and at [www.lsbm.ac.uk/disability-office](http://www.lsbm.ac.uk/disability-office). Alternatively, students can book an appointment with the Disability Wellbeing Advisor by emailing [disability@lsbm.ac.uk](mailto:disability@lsbm.ac.uk). Any requests for support will be treated in strict confidence.

## **8.3 Assessment**

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

## **8.4 Career planning and engagement**

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

## **8.5 Discipline and student complaints**

Students who make a complaint of discrimination have the right to do so without fear of victimisation and we will make every effort to ensure victimisation does not occur.

Discipline and student complaints procedures will be applied fairly and transparently for all students.

Allegations of harassment or discrimination will be dealt with under our Student Disciplinary Policy and Procedure.

# **9. Related regulations, policies and procedures**

- Admissions Policy
- Dignity and Respect at Work Procedure
- Disability Policy
- Email Acceptable Use Policy
- Ethics Policy
- Internet Acceptable Use Policy
- Prevent Policy
- Staff Disciplinary Procedures
- Staff Grievance Procedures
- Staff Recruitment and Development Policy

- Student Complaints Policy and Procedures
- Student Disciplinary Policy and Procedures
- Unconscious Bias Guidance Notes

## **10. Review of Equality, Diversity and Inclusion Policy**

The Equality, Diversity and Inclusion Policy will be reviewed annually by our Senior Management and Leadership Team (SMLT). Any amendments require the approval of our Board of Directors.