

**RNC Policy: Equality, Diversity and Inclusion (EDI)**

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| Responsibility: | Chair of the EDI Group | | |
| Reviewed by: | EDI Group | | |
| Approved by SMT: | September 2025 | | |
| Approved by Governor Committee: | Student Experience Committee – | | |
| Date of next review: | September 2026 | | |
| EIA completed: | September 2025 | EIA reviewed: |  |
| Published on Website | Yes | | |
| Uploaded to Smartlog | No | | |
| Other relevant Policies and reference documents:  Single Equality Scheme 2022 – 2027 | | | |
| **Commitment Statement**  RNC is committed to the fundamental values of equality, diversity and inclusion, which creates a supportive environment for all members of our community to live, work and study. Our commitment to equality and diversity means that this policy has been screened in relation to the use of plain English, the promotion of the positive duty in relation to race, gender and disability and to eliminate discrimination to other equality groups related to age, sexual orientation, gender identity, marital or civil partnership status, pregnancy or maternity and religion or belief. We believe that safeguarding has paramount importance and RNC recognises its responsibility and duties within the Government Prevent Strategy to be aware of and where appropriate act to ensure the safety of all students from radicalisation and extremism.  This document is available in alternative formats on request. If you think RNC can improve the fairness of this policy, please contact the author who has responsibility for the review and update. | | | |

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**Equality, Diversity and Inclusion (EDI)**

# EDI Policy Statement

RNC is committed to fostering a respectful and inclusive environment where everyone is treated with fairness, dignity, and respect. We actively promote equality by recognising each individual's rights, status, and opportunities. We strive to ensure that all students, staff, and volunteers feel valued, included, and able to contribute fully. We are dedicated to removing unfair barriers and enabling every individual to realise their full potential.

RNC does not tolerate unfair treatment on the grounds of gender, marital/civil partnership or parental status, race, colour, nationality, ethnic or national origin, disability, sexual orientation, gender identity, religion, age or any other factor.

# Purpose and Scope

This policy exists to:

1. Promote Equality, Diversity, and Inclusion to ensure RNC is an inclusive environment.
2. Make clear RNC’s stance on unfair discrimination.
3. Provide the legal context of EDI.
4. Provide key definitions.
5. Clearly set out responsibilities.

This policy applies to students, staff, governors, volunteers, visitors, customers, contractors, and partner organisations.

# Legal Framework

## 3.1 Equality Act 2010

The Equality Act legally protects people from harassment, victimisation and discrimination in the workplace and in wider society. It incorporates all earlier equality laws in one piece of legislation. The Act makes it unlawful to discriminate against people with a 'protected characteristic’ (see section 5)

The Equality Act protects people from bullying and harassment and from the following types of discrimination in the workplace:

Direct discrimination, Discrimination by association, Discrimination by perception, and Indirect discrimination (see definitions in section 4).

## 3.2 Public Sector Equality Duty

The Public Sector Equality Duty was developed to provide consistency between the equality duties and to cover all of the protected characteristics. In summary, under the public sector equality duty, organisations in the public sector must have due regard to the need to:

* prevent unlawful discrimination, harassment and victimisation and other behaviour that is not allowed under the act.
* provide equal opportunities for people who share a protected characteristic and those who do not.
* promote good relations between people who share a protected characteristic and those who do not.

Due regard means such regard as it is appropriate in all the circumstances. The three aims of the general equality duty must be considered and reflected upon during the:

* decision-making process
* design of policies (including internal policies)
* delivery of services

Please note RNC is not public sector body, however, S.149(2) of the Equality Act says that the general equality duty also applies to bodies carrying out public functions. This brings within the scope of the duty both public bodies not listed as a ‘public authority’ in Schedule 19 of the Act ***and bodies in the private or voluntary sector which, under statutory provisions or contractual or other arrangements***, carry out public functions. Some of RNC/TP4 functions will not be covered by the public sector equality duty but RNC is committed to the achievement of the duties as they offer individuals stronger protection against discrimination and provides clear

expectations that RNC must treat everyone with dignity and respect.

# Definitions

## 4.1 What is equality?

Equality enables a fairer environment which recognises that everyone has individual needs and the right to have those needs respected. Equality does not mean treating everybody the same, it is about recognising that everybody is different yet treating everyone with an equal level of respect and ensuring they have equal access to employment, education, services, and facilities.

## 4.2 What is diversity?

Diversity is about recognising individual as well as group differences, treating people as individuals, and placing positive value on the distinctions between individuals. The differences within and between groups of people should be respected and celebrated. The successful implementation of equality and diversity in all aspects of work ensures that colleagues, staff and students are valued, motivated and treated fairly.

## 4.3 What is inclusion?

Inclusion embraces all students and entails taking action to remove barriers to participation and learning. Inclusion also involves eliminating discrimination and promoting equality. It means creating an environment where everyone feels welcomed and valued.

## 4.4 What are the different forms of discrimination?

* **Direct discrimination** is when someone is treated less favourably than someone else.
* **Discrimination by association** is direct discrimination towards an individual because they are associated with someone who has a Protected Characteristic.
* **Discrimination by perception** is direct discrimination of someone because others perceive them to have a protected characteristic, even if they do not.
* **Indirect discrimination**: happens when a policy or practice is applied equally to a group, but this has the effect of putting people who share a protected characteristic at a particular disadvantage when compared with others in the group, without justification.

## 4.5 What is harassment and victimisation.

* **Harassment:** The 2010 Act defines harassment as ‘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 for that individual'. It applies to all the protected characteristics except for pregnancy and maternity and marriage and civil partnership.

An employee can complain of behaviour they find offensive even if it is not directed at them. This 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.

* **Victimisation** is when someone is treated less favourably as a result of being involved with a discrimination or harassment complaint. Ways someone could be victimised include, being labelled a troublemaker, being left out. not being allowed to do something.

Victimisation is a specific type of discrimination under the law (Equality Act 2010). The law says victimisation means 'suffering a detriment' because you've done or intend to do a 'protected act'. A 'protected act' means taking action related to discrimination law. This includes. making a complaint of discrimination or harassment; supporting someone else's complaint; gathering information that might lead to a complaint; acting as a witness in a complaint; saying something or giving evidence that does not support someone else's complaint.

The law also protects a person from victimisation when someone else thinks the person has done or intends to do any of the things above. 'Detriment' means someone experiences one or both of the following: being treated worse than before or having their situation made worse.

If an employee has maliciously made or supported an untrue complaint they are not protected under the law from victimisation

## 4.6 What are reasonable adjustments?

Under the Equality Act 2010 public sector organisations have to make changes in their approach or provision to ensure that services are accessible to disabled people as well as everybody else. Reasonable adjustments can mean alterations to buildings by providing lifts, wide doors, ramps and tactile signage, but may also mean changes to policies, procedures and staff training to ensure that services work equally well for people with learning disabilities.

When considering whether an adjustment is reasonable the following factors are considered:

* The extent to which the adjustment would help/remove the disadvantage the person is experiencing.
* How practicable the adjustment is.
* The cost of the adjustment.
* If the adjustment will impact RNC’s operation / activities.
* The resources available to the organisation (especially financial resources).
* Whether other external assistance is available.

# Protected Characteristics

**Age** - Before the 2010 Equality Act employers were already prevented from saying without any justification that an applicant was too old or too young for a job. The effect of the Act is to underline the unlawfulness of discriminating based on age. If an employer can justify the reasons for treating someone differently because of their age, this is not considered to be unlawful (i.e. it is not direct or indirect discrimination). An example might be of an employer refusing to consider a job applicant on the basis of age (i.e. being too young) since the role reasonably calls for an amount of experience and it is not viable to provide training. Employers are no longer permitted to use a default retirement age of 65 when writing contracts of employment.

**Disability -** The Act says that a person is disabled if they have a physical or mental impairment which has a substantial and long term adverse effect on their ability to carry out normal day-to-day activities.

Disabled people have been protected by UK for some time before the 2010 Act

came into effect. This included the requirement for an employer to make

reasonable adjustments to enable a disabled person to work for them.

Under the 2010 Act indirect discrimination, associative discrimination and

perceptive discrimination all became unlawful in relation to disabled people and

discrimination arising from a disability is forbidden. Within this area of the Act falls the matter of pre-employment health questions, the use of which is now limited to certain circumstances only. Such circumstances include the use of questions to determine whether reasonable adjustments are needed for a new employee. These types of questions are less restricted once a job offer has been made.

**Pregnancy and Maternity -** The Act gives protection against direct discrimination to women who are pregnant or on maternity leave during the period of pregnancy and during statutory maternity leave. When making a decision about a woman’s employment, an employer is not permitted to take into account a period of absence due to pregnancy-related illness.

**Marriage and Civil Partnership -** The 2010 Act makes it unlawful to discriminate directly or indirectly against people who are married or in a civil partnership.

**Race -** Within the Act, ‘race’ includes colour, nationality and ethnic or national

origins. It is unlawful for employers to discriminate in any way on the grounds of a

person’s race.

**Religion or Belief -** An employer must be aware that people are protected against all types of discrimination on the grounds of their religion or beliefs (or the absence of these). The Act says that to be protected a:

• religion must have a clear structure and belief system

• belief (any religious or philosophical belief or lack of such belief) must

satisfy criteria defined in case law (RNC adopts the Grainger Criteria).

**Sex -** It is not lawful to treat someone less favourably on the basis of their sex.

Protection applies against all types of discriminatory actions provided for by

the 2010 Act. Intersex people (the term used to describe a variety of conditions in which a person is born with a reproductive or sexual anatomy that doesn't fit the

typical definitions of female or male) are not explicitly protected from discrimination by the Equality Act, but you must not be discriminated against because of your gender or perceived gender.

**Sexual Orientation -** People are protected against all types of discrimination on the grounds of their sexual orientation. This means those who are bisexual, gay, heterosexual and lesbian.

**Gender Reassignment -** The Equality Act 2010 says that a person must not be discriminated against because they are transsexual, when their gender identity is different from the sex assigned to them at birth. For example: a person who was born female affirms their identity and begins living as a man. In the Equality Act it is known as gender reassignment. All transsexual people share the common characteristic of gender reassignment. To be protected from gender reassignment discrimination, people do not need to have undergone any specific treatment or surgery to change from their birth sex to their preferred gender. This is because changing their physiological or other gender attributes is a personal process rather than a medical one.

A person can be at any stage in the transition process – from proposing to reassign

their gender, to undergoing a process to reassign their gender, or having

completed it. The Equality Act says that a person must not be discriminated against because of their gender reassignment as a transsexual[[1]](#footnote-1) .

# Roles and Responsibilities

All staff and volunteers must adhere to this policy. The Senior Management Team are accountable for ensuring the policy is implemented.

**Role of all employees, volunteers and governors**

* act in ways that respect and value the diversity of others.
* not discriminate unfairly against students, staff or visitors
* challenge and report any behaviour towards a colleague or student that could be interpreted as discriminatory.
* understand what is expected of them in terms of their performance, their behaviour and their conduct towards others.
* set a positive example at all times.
* complete appropriate mandatory CPD

**Role of line managers**

Every line manager has a responsibility to:

* set a positive example by ensuring that their actions and behaviours promote EDI.
* challenge and report inappropriate behaviour as soon as they become aware of it.
* support and implement action that RNC takes to improve diversity, inclusion and equal opportunities.
* provide appropriate learning opportunities to staff and volunteers in order to put the EDI policy into practice.
* ensure that mandatory EDI CPD is completed by all staff and volunteers.
* encourage all staff and volunteers to complete their EDI monitoring data.
* ensure staff and volunteers are aware of and carry out their responsibilities under the law and this policy.

**Role of the EDI Committee**

* Update, monitor and evaluate the EDI Single Equality Scheme action plan.
* Ensure that actions in the EDI plan reflect and promote continuous awareness of EDI as central to the College ethos.

In addition to these generic aspects, departments and services also have EDI responsibilities that are specific to their functions:

**Teaching Team**

* select, create and use materials and resources that reflect a diverse society.
* maximise opportunities to create additional / ad hoc learning points across the curriculum offer when issues around EDI topics arise.
* make full use of the EDI / FBV log on Databridge or via the intranet in order to share good practice and ideas across the whole teaching team.

**Student Support Services Team**

* monitor student pastoral activity for EDI related issues and address appropriately.

**Admissions**

* collect student EDI data via the application form so that it can be used to analyse our student profile.
* ensure that EDI and accessibility is considered from the outset and throughout the Pre-Entry Assessment process.

**Communications**

* all communications internally and externally will be written, designed and communicated with accessibility in mind.
* diverse imagery will be used where relevant to represent the diverse communities of our stakeholders.

**Finance**

* we will ensure that persons engaged in any aspect of procurement on the behalf of RNC will work in accordance with our values and standards as outlined in this policy.

**Fundraising**

* fundraising opportunities and activities must be accessible to all and reflect the values of RNC.

**Tech Support**

* ensure that technology enables and empowers staff and volunteers to be able to carry out their roles to the best of their abilities.
* accessible technology will be made available wherever possible to those that need it.

**MIS**

* report EDI data as part of the individual learning record and comparable government returns for staff and students.
* collect and analyse EDI data to share with college and senior managers for the purposes of: reporting on enrolment trends, achievement rates and outcomes; listening to views of students; enhancing the experience of staff and students.
* lead on increasing the declaration rates for EDI student data to enable analysis of student profiles and their satisfaction with the student experience.

**Human Resources**

* ensure that mandatory EDI CPD is provided in an accessible way for all staff and completion is monitored.
* provide additional EDI related learning and development opportunities to ensure that all staff and volunteers are equipped with the tools to provide support to a diverse range of students.
* monitor grievances for EDI related complaints and address any issues.
* collect and analyse EDI data to enhance recruitment practices for staff and volunteers to ensure that we are representative of the diverse communities of our stakeholders.
* embed equality, diversity and inclusivity into all employment and volunteering practices.

**Estates**

* ensure that our campus and buildings are safe and accessible for all people.

# Implementation

EDI Leadership

* We set out our commitment to equality, diversity and inclusion in our Single Equality Scheme, which is monitored and updated every five years by our EDI Committee.
* We review an EDI action plan at EDI committee.
* We consider every aspect of RNC’s work to remove barriers, address unintended differences in treatment or effect, and maximise everyone’s abilities and contribution.
* We ensure that Equality Impact Assessments are completed for all policies.
* The leadership team will demonstrate commitment to the advancement of equality of opportunity and foster good relations across the RNC community. We have in place policies and systems by which any behaviour that is discriminatory, intimidating, or otherwise contrary to RNC values can be dealt with rapidly and effectively in an environment which positively supports those who challenge such behaviour.
* We work to raise awareness and understanding and, where necessary, to modify behaviour and challenge attitudes.
* We encourage feedback and discussion around policies and procedures.
* We work with others to help eradicate prejudice, discrimination, harassment and negative stereotyping.
* We support campaigns for fair laws which treat people equally and protect groups from discrimination.

Student Provision

* We strive to provide appropriate, sensitive and accessible services to all students and staff.
* We base students’ programmes and our teaching on individual need.
* We provide students with support in all aspects of independent living, social integration and progression toprepare them for their next steps.
* EDI is embedded within the planning and delivery of all programme areas and is an area of scrutiny within quality assurance processes. We expect all students and staff to behave in a way that others will experience as respectful and fair.
* We ensure good practices for equality, diversity, inclusion and Fundamental British Values are logged via the intranet on our management system.

Workforce

* All staff are required to complete mandatory training annually via Smartlog or their preferred medium in Equality, Diversity and Inclusion awareness and Bullying and Harassment.
* We support the use of a range of flexible working patterns.
* We promote equality of opportunity.
* We take steps to ensure equality of opportunity in our recruitment of students, staff and Governors.

Environment

* We adapt/design our buildings an equipment to ensure inclusion.
* We promote good relations across our diverse workforce and student body
* We promote positive attitudes regarding equality, diversity and inclusion

All policies and procedures are available for students and staff in an accessible format of their choice. The Policies and Procedures files are located on RNC SharePoint

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| Version Control | | | |
| Version | Date | Amendments | Author |
| 1.0  1.1 | March 2019  April 2019 | Review of previously approved policy. Version control added.  EIA template updated and EIA reviewed – no changes required.  Approved by SMT. | MKJ  MF  MKJ |
| 1.2 | December 2021 | Added roles and responsibilities | RS |
| 1.3 | January 2024 | Minor word changes  Role and responsibilities reviewed | JPr |
| 1.4 | May 2024 | Minor word changes. | JPr |
| 1.5 | May 2025 | Full review.‘online platforms’ amended to ‘Smartlog’ in Section 4.  Logging good practice added to section 4  Further bullet points added to section 4 in relation to promoting EDI | JPr |
| 2.0 | August 2025 | Significant rewrite to include: Policy Statement; Purpose and Scope; Legal Framework; Rewording of the definition of Equality; introduction of new definitions; inclusion of equality impact assessments; rewording of expectations of the leadership team; Change of Registry to Admissions. Reformatting throughout. | MF |

1. Some people prefer the description transgender person or trans male or female. A wide range of people are included in the terms ‘trans’ or ‘transgender’ but would not be protected as transgender unless they propose to change gender or have done so. [↑](#footnote-ref-1)