

## Equality, Diversity and Inclusion Policy

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<b>Produced by</b>	Academic Dean	<b>Approved by</b>	Academic and Quality Board
<b>Related policies</b>	<ul style="list-style-type: none"> <li>• Admissions Policy</li> <li>• Safe Staff Recruitment Policy</li> <li>• Complaints Policy</li> <li>• Safeguarding &amp; Prevent Policy</li> <li>• Staff Development Policy</li> <li>• Academic &amp; Malpractice Policy</li> <li>• Staff Handbook</li> <li>• Disability Policy</li> <li>• Corporate Social Responsibility Policy</li> </ul>		
<b>External reference points</b>	<p>Sustainable Development Goals (2015): 4 Quality Education, 5 Gender Equality, 10 Reduced Inequalities.</p> <p>QAA UK Quality Code for Higher Education, June 2024: Principle 9a: <i>Providers operate recruitment, selection and admissions processes that are transparent, fair and inclusive.</i></p> <p>Equality Act 2010.</p> <p><i>An employer (A) must not discriminate against a person (B) —</i>  <i>(a) in the arrangements A makes for deciding to whom to offer employment;</i>  <i>(b) as to the terms on which A offers B employment;</i>  <i>(c) by not offering B employment.</i></p>		

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## 1. Background and Purpose

LCK Academy (LCKA) is dedicated to ensuring equality of opportunity in education and employment for all members of the communities we serve, including applicants, students, staff, volunteers and other stakeholders. 'Embracing Diversity' is a core value in the Academy's Strategic Plan, which aims to ensure that people from a wide range of backgrounds benefit from access and participate in the LCKA mission. 'Engagement with Communities' is also one of the enablers in the Academy's Strategic Plan and includes the strategic priority of reaching out to a wider community of people across the UK and providing them with the high-quality education they need. Encouraging equality, diversity and inclusion is also a cross-cutting theme that underpins the enablers in the Strategic Plan. The introduction to the Academy's Access and Participation Statement includes the following statement:

*LCKA's approach to equality, diversity and inclusion ensures and provides access to both a quality education and qualifications that raises people's confidence and living standards.*

The Academy values the diversity of its learning and teaching community of students, staff and other stakeholders and is committed to promoting equal opportunities for all.

## 2. Aims and Objectives

This policy aims to protect, promote and advance Equality, Diversity and Inclusion for all students, staff and other stakeholders at the Academy. The policy objectives include the following:

- To actively prevent and confront discrimination, harassment, victimization, and other forms of abusive conduct.
- To ensure that students and staff can thrive in an inclusive environment that welcomes and supports them.
- To ensure that everyone can leverage their strengths and overcome challenges with equal opportunities for growth and development.
- To strive for best practices in the approach to Equality, Diversity and Inclusion across all of the Academy's functions across the student lifecycle from Admissions through to Graduation and beyond.
- To make reasonable adjustments wherever possible for groups identified as disadvantaged and underrepresented
- To work towards achieving corporate social responsibility objectives in support of Sustainable Development Goals 4 (Quality Education), 5 (Gender Equality), and 10 (Reduced Inequalities).

### **3. Application**

Discrimination in any form within the Academy's working environment is strictly prohibited, and all necessary measures will be taken to prevent and confront it. The Academy is committed to ensuring that no employee or student faces unlawful discrimination, whether directly or indirectly, based on any of the protected characteristics outlined in the Equality Act 2010:

- Age
- Disability
- Gender reassignment
- Marriage or civil partnership (in employment only)
- Pregnancy and maternity
- Race
- Religion or belief
- Sex and
- Sexual orientation.

This commitment extends across all aspects of the Academy's services including:

- Marketing of LCKA courses and related services
- Applications for courses of study
- Student recruitment and admissions, including entry tests and academic interviews
- Teaching, learning and assessments
- Career development
- Staff recruitment and development
- Handling complaints and appeals
- Handling staff grievances
- Student and staff discipline

### **4. Student Recruitment**

As stated in the Academy's Access and Participation Statement, the Academy seeks to widen access and participation to its provision to as many disadvantaged and under-represented groups as possible. Decisions affecting student admissions will be based solely on Academic ability and reviewed by qualified faculty members during Academic interviews. Students who have disclosed disabilities will be offered an opportunity to discuss additional support options available through the Academy, and every effort will be made to make reasonable adjustments to accommodate their needs and provide them with equitable opportunities for access and success.

## 5. Staff Recruitment

The Academy is committed to providing equal opportunities for all its staff and members of the public where relevant to apply for job vacancies at the Academy. The Academy aims to ensure equitable treatment of all job applicants and staff members, without bias or discrimination in relation to the protected characteristics in the Equality Act 2010 and provided in a previous section of this policy above. Staff members involved in the selection processes are required to adhere to the Academy's policies on equality, diversity, and inclusion after completing appropriate training on the staff recruitment and selection process and practices at the Academy. Decisions impacting staff recruitment will be based solely on job-related competence and merit. Please see the Academy's Safe Staff Recruitment Policy (2.18) for further details.

### 5.1. Recruitment of ex-offenders

The Academy strives to provide fair opportunities to all candidates, including those who have a criminal record where applicable. As part of the application process, candidates are asked to disclose any criminal history early in the process. This information should be sent confidentially in a separate letter to the designated contact person. Only those directly involved in the recruitment process will have access to this information.

Recruitment decisions will take account of the nature of the position and the circumstances surrounding any offences. The Academy will discuss with candidates the relevance of any disclosed offences to the job in question.

***Failure to disclose relevant information may lead to the withdrawal of an offer of employment.***

### 5.2. Staff Training

The Academy provides training for all staff, to ensure they are fully aware of all the related issues and can proactively implement the Academy's key objectives in relation to equality, diversity and inclusion. Staff members must attend training on Prevent and safeguarding issues. See the Safeguarding and Prevent Policy for more information.

### 5.3. Career development

The Academy strives to ensure that all staff, regardless of their role, have fair access to training and career development opportunities that match their job role, skills requirements and experience. Employment and promotion opportunities are based solely on merit, promoting equality and fairness in our community.

## 6. Stakeholder Responsibilities

All staff, students and other stakeholders are expected to respect and tolerate each other. Instances of discrimination, abusive language or inappropriate behaviour will be addressed as misconduct under the Academy's **Non-Academic Disciplinary Policy** for students or the **Staff Disciplinary Procedures** outlined in the Staff Handbook. Severe cases of abuse may constitute gross misconduct and result in immediate suspension or dismissal.

Sexual harassment is considered both an employment rights issue and a potential criminal matter, particularly in cases involving allegations of sexual assault. Harassment under the Protection from Harassment Act 1997, which extends beyond protected characteristics, constitutes a criminal offence.

### 6.1. Staff Responsibilities

Staff members are required to familiarise themselves with the Equality Act 2010 and are expected to actively engage in training sessions, briefings, and awareness-raising initiatives in relation to equality, diversity and inclusion. They are also obligated to promptly report any instances of discrimination or unfair treatment to their respective line managers.

Adherence to this policy and the Academy's core values is mandatory for all staff. They are expected to demonstrate respect for and uphold the rights of colleagues and students, especially regarding the confidentiality of sensitive personal information. Disclosure of such information without explicit consent from the individual concerned is strictly prohibited, as outlined in the Academy's **Data Protection Policy** and **Privacy Notice and Consent Policy**.

### 6.2. Student Responsibilities

Students are required to adhere to this policy and the Academy's core values. Students are expected to promptly report any instances of discrimination or unfair treatment to a suitable member of staff such as their Personal Tutor, Student Support Officer, or any member of the Senior Leadership Team.

Students are expected to demonstrate respect for and uphold the rights of others by maintaining the confidentiality of sensitive personal information. Disclosure of such information should only occur with explicit permission from the individual, except in cases where concerns related to Prevent Duty are raised.

### 6.3. Key staff

The Senior Leadership Team (SLT) chaired by the CEO, [irshad.jamaldeen@lckacademy.org.uk](mailto:irshad.jamaldeen@lckacademy.org.uk), provides comprehensive leadership on equality, diversity and inclusion within the Academy and oversees the implementation of the Equality, Diversity and Inclusion Policy.

## 7. Communication

The Equality, Diversity and Inclusion Policy is available on the Academy's website. All staff, students and other stakeholders are required to sign a declaration verifying that they have read and understood the policy and their responsibilities regarding equality, diversity and inclusion at the Academy. Declarations are signed by students during the Admissions process and by staff during their induction and onboarding.

## 8. Monitoring & Evaluation

Data on staff and student demographics, covering all protected characteristics, is collected confidentially and anonymously for the purpose of monitoring and evaluating equality, diversity and inclusion at the Academy. Additionally, LCKA gathers the following information annually for each group of students based upon their characteristics:

### ***Student Data***

- Number of students enrolled
- Applications for courses received
- Admission offers and letters issued
- Conversion rates from applications to admissions and admissions to enrolment
- Rates of cancellations and withdrawals
- Utilisation of student services
- Participation in additional activities
- Student success rates, including continuation, completion and progression
- Incidents of disciplinary actions, complaints, and harassment/bullying

### ***Employee Data***

- Total staff count
- Staff grades and categories, distinguishing between full-time and part-time roles
- Job applications received
- Candidates shortlisted for positions
- Appointments and promotions made
- Employment types (permanent, fixed-term contracts)
- Employee relations matters such as grievances, disciplinary actions, harassment cases, capability assessments, and complaints
- Staff departures including resignations and dismissals
- Requests for flexible work arrangements
- Return rates from maternity leave and the roles employees return to
- Salary levels
- Profile of employees with dependents and caring responsibilities
- Staff participation in Continuing Professional Development (CPD), especially CPD related to Equality, Diversity and Inclusion

Data points regarding student access (recruitment, enrolment), and success (continuation, completion, and progress) are included in the annual Programmes Quality Review (PQR) prepared by the Academic Dean and presented annually to the Academic and Quality Board. The PQR provides an evaluation of achievement gaps between students with different characteristics, especially where those characteristics intersect with other factors affecting disadvantaged and under-represented groups, such as people from multiple areas of deprivation. The ABQ reports on the equality of access, participation and success for all students at the Academy to the Board of Governors.

Data points regarding staff recruitment, performance reviews, and promotions are reported to the Senior Leadership Team (SLT) by the Head of Academy Advancement. The SLT reports on equality, diversity and inclusion to the Board of Governors.

The overall Internal Annual Monitoring Review (IAMR) is compiled by the Academic Dean and Head of Academy Advancement includes an evaluation of progress made towards the implementation of this policy and the equitable access and participation for students, staff and other stakeholders at the Academy.

In addition to annual monitoring and evaluation, the Academy conducts additional monitoring as needed, for instance, in response to specific issues raised. This ensures that we can actively promote greater equality and diversity across all aspects of Academy operations, including learning, teaching, governance, admissions, and staff management and development.

## **9. Policy Review**

The Senior Leadership Team (SLT) monitors and evaluates the implementation of this policy and ensures that equal opportunity practices are in line with changes to legislation or any developments from regulatory bodies.

All Academy policies are reviewed at least once per annum by the relevant Board or Committee, including the SLT, Academic and Quality Board (AQB) or the Board of Governance (BoG). Each review includes an assessment of the policy's impact on equality, diversity and inclusion. Amendments are made where necessary to ensure that each policy remains up to date, and robust in confronting and preventing discrimination at the Academy.

The Head of Quality will keep track of equality, diversity and inclusion in student applications, enrolments, and achievements, reporting to the Academic Dean through quarterly audits.

Likewise, the Head of HR will manage and monitor equality, diversity and inclusion in job applications and staff demographics across all functions of the Academy. They will report on a quarterly basis to the Head of Academy Advancement, which reports to the Senior Leadership Team.



## 10. Complaints of Discrimination

The Academy treats all complaints of discrimination seriously, whether raised by students, staff, suppliers, contractors, or other third parties. Students, staff or other stakeholders who believe they have experienced discrimination are encouraged to promptly report the issue to their personal tutor in the case of a student's and line manager in the case of staff or any member of the Senior Leadership Team. Staff should refer to the Academy's **Staff Grievance Procedures** in the Staff Handbook, while students should follow the Academy **Complaints and Appeals Policy**.

Allegations regarding potential breaches of this policy will be handled confidentially and investigated thoroughly. In cases where allegations of discrimination are substantiated, the Academy is committed to ensuring that complainants are protected from victimisation, harassment, or any form of less favourable treatment. All such incidents will be managed according to the Academy's **Staff Discipline** and **Student Non-Academic Misconduct** Policies.