

EDA COLLEGE



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Equality, Diversity and Inclusion Policy¹

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¹ In accordance with the Equality Act 2010, OfS Condition E3, and the Public Sector Equality Duty.

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1. Introduction and Purpose

EDA College (“the College”) is deeply and genuinely committed to equality, diversity and inclusion. This is not simply a legal obligation — it is central to who we are and why we exist. Our student community is one of the most diverse in the higher education sector. We serve students from Black, Asian and Minority Ethnic (BAME) backgrounds, mature students returning to education, first-generation university students, students with caring responsibilities, students from low-income households, and students with disabilities. Our community is our greatest strength.

This Equality, Diversity and Inclusion (EDI) Policy sets out EDA College’s legal obligations, institutional commitments and practical approach to advancing equality, celebrating diversity and building an inclusive environment in which every member of our community can thrive — as a student, as a member of staff, or as a governor.

The Policy covers all nine protected characteristics under the Equality Act 2010, applies to every aspect of college life, and establishes the accountability framework through which EDA College will deliver on its EDI commitments.

“EDA College is built on the belief that higher education should be accessible to everyone. Equality, diversity and inclusion are not a programme or an initiative at EDA College — they are the foundation of everything we do. We are committed to creating a community where every person is valued, respected and supported to succeed.”

2. Legislative and Regulatory Framework

This policy has been developed in accordance with:

Legislation / Framework	Key Requirement
Equality Act 2010	The primary legislation prohibiting discrimination, harassment and victimisation on the basis of protected characteristics; imposes the Public Sector Equality Duty (PSED) on public bodies
OfS Regulatory Framework — Condition E3	Requires registered higher education providers to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations in relation to access and participation
OfS Regulatory Framework — AP1–AP4 (Access and Participation)	Requires providers to set targets and deliver interventions to improve outcomes for underrepresented groups
Human Rights Act 1998	Incorporates ECHR rights including Article 14 (freedom from discrimination) and Article 8 (right to private and family life)
Public Sector Bodies Accessibility Regulations 2018	Requires digital content to be accessible to people with disabilities (WCAG 2.1 AA)
Gender Pay Gap Information Regulations 2017 (where applicable)	Requires certain employers to publish gender pay gap data
Socioeconomic Duty (Equality Act 2010, s.1)	Not yet commenced nationally but EDA College voluntarily considers socioeconomic disadvantage in its equality work
CUC Higher Education Code of Governance (2020)	Governors have specific responsibilities in relation to EDI; Board composition should reflect diversity
UN Convention on the Rights of Persons with Disabilities (CRPD)	Informs the College’s approach to disability inclusion beyond minimum legal requirements

3. Scope and Application

This policy applies to:

- All activities of EDA College, whether conducted on College premises, online or at external venues
- All current and prospective members of staff, at every grade and on every type of contract
- All enrolled and prospective students, on every programme of study
- All governors and committee members
- All contractors, agency workers, consultants and volunteers carrying out work on behalf of the College
- All visitors to College premises
- All organisations, companies and individuals with whom EDA College has a business relationship, including suppliers, awarding bodies, employer partners and community organisations

This policy applies in relation to all nine protected characteristics under the Equality Act 2010. The College is committed to advancing equality across all characteristics, not only those most statistically prominent in its community.

4. Our EDI Vision and Commitments

4.1 Our Vision

EDA College is committed to being a genuinely inclusive institution — one where every student achieves their potential regardless of their background; where every member of staff is valued, developed and supported to progress; where difference is not merely tolerated but actively celebrated; and where equality is embedded in our strategy, our leadership, our teaching and our daily culture.

4.2 Our Core EDI Commitments

EDA College commits to:

- Eliminating all forms of unlawful discrimination, harassment and victimisation in relation to any protected characteristic
- Advancing equality of opportunity between persons who share a protected characteristic and those who do not
- Fostering good relations between persons who share a protected characteristic and those who do not
- Creating an environment in which the dignity of every person is respected and maintained
- Embedding EDI considerations into all strategic decisions, policies, procedures and processes
- Listening to and acting on the experiences of students, staff and communities who face disadvantage or discrimination
- Setting and publishing clear, measurable Equality Objectives and reporting progress annually
- Conducting Equality Impact Assessments on all significant new or revised policies, procedures and decisions
- Being transparent about our EDI data, including disaggregated student and staff outcome data
- Investing in EDI training for all staff and governors
- Holding our leadership accountable for EDI performance

5. The Nine Protected Characteristics

The Equality Act 2010 protects individuals from discrimination on the basis of nine characteristics. EDA College is committed to advancing equality in relation to all nine characteristics. Each is described below:

1. AGE

Definition: Age refers to a person's age group, which can be a particular age (e.g. 32 year olds) or a range (e.g. under 25s). There is no minimum or maximum age for protection.

Examples of unlawful treatment: Refusing to admit an older student because 'they won't fit in'; age-related jokes or comments directed at staff or students; excluding older or younger staff from training or promotion opportunities.

2. DISABILITY

Definition: A person has a disability if they have a physical or mental impairment that has a substantial and long-term negative effect on their ability to carry out normal day-to-day activities. Long-term means 12 months or more, or likely to recur. Disability includes physical impairments, sensory impairments, mental health conditions, learning difficulties (e.g. dyslexia, ADHD), and chronic medical conditions (e.g. diabetes, epilepsy, HIV).

Examples of unlawful treatment: Refusing to make reasonable adjustments for a disabled student or member of staff; treating a disabled person less favourably than a non-disabled person; failing to consider disability access when planning events or facilities.

3. GENDER REASSIGNMENT

Definition: Gender reassignment is the process of transitioning from one gender to another. A person is protected from the point at which they propose to undergo, are undergoing, or have undergone gender reassignment. A person does not need to have had medical treatment to be protected.

Examples of unlawful treatment: Refusing to use a trans person's preferred pronouns; excluding a trans student or staff member from facilities appropriate to their gender; outing a trans person without their consent; hostile comments about gender reassignment.

4. MARRIAGE AND CIVIL PARTNERSHIP

Definition: This characteristic protects individuals from discrimination in employment because they are married or in a civil partnership. Note: this characteristic does not apply to education (i.e. to students) — only to employment contexts.

Examples of unlawful treatment: Refusing to promote a married member of staff on the assumption that they will prioritise family over work; asking intrusive questions about a person's marital status in a job interview.

5. PREGNANCY AND MATERNITY

Definition: Pregnancy is the condition of being pregnant. Maternity refers to the period after the birth of a child and is linked to maternity leave in employment contexts. In education, the protected period lasts until the end of maternity leave or, if shorter, 26 weeks after the birth.

Examples of unlawful treatment: Refusing to defer a student's studies during maternity leave; penalising a pregnant member of staff through performance assessment; making negative comments about a person's pregnancy.

6. RACE

Definition: Race includes colour, nationality (including citizenship), and ethnic or national origins. A racial group can be made up of two or more distinct racial groups. EDA College's student community includes a high proportion of students from BAME backgrounds, and the College has a particular responsibility to close racial attainment and outcome gaps.

Examples of unlawful treatment: Using racially offensive language; making assumptions about a student's ability based on their ethnic origin; failing to address a racial attainment gap; treating students from one racial group less favourably in admissions or assessment.

7. RELIGION OR BELIEF

Definition: Religion includes any religion, including a lack of religion. Belief includes any religious or philosophical belief. This includes religions such as Christianity, Islam, Hinduism, Judaism, Sikhism and Buddhism, and philosophical beliefs such as humanism or veganism (where sincerely held). Political beliefs are not protected.

Examples of unlawful treatment: Refusing to accommodate a student's religious observance requirements (e.g. prayer times, religious holidays); mocking or trivialising a person's religious belief; treating a person less favourably because they have no religion.

8. SEX

Definition: Sex refers to whether a person is male or female. Both men and women are protected from sex discrimination. Sex discrimination is still prevalent in higher education, particularly in relation to career progression, pay gaps, and gendered harassment.

Examples of unlawful treatment: Paying a female member of staff less than a male colleague doing equivalent work; making gendered assumptions about a student's subject choices or abilities; sexual comments or jokes; gendered harassment in the classroom or online.

9. SEXUAL ORIENTATION

Definition: Sexual orientation refers to a person's sexual attraction to persons of the same sex, opposite sex, or either sex. This includes gay and lesbian people, bisexual people, and heterosexual people. A person is also protected if they are perceived to have a particular sexual orientation, even if that perception is incorrect.

Examples of unlawful treatment: Hostile comments about LGBTQ+ people; outing a person's sexual orientation without their consent; refusing to address homophobic or biphobic bullying; excluding LGBTQ+ students from College activities.

6. Types of Unlawful Discrimination

The Equality Act 2010 prohibits several distinct types of unlawful conduct. EDA College is committed to preventing all of the following (see also Appendix A for detailed definitions):

Type of Conduct	Definition	Example
Direct discrimination	Treating someone less favourably because of a protected characteristic (or perception of a characteristic, or association with someone who has a characteristic)	Refusing to interview a job applicant because she is pregnant; giving a lower mark to a student because of their ethnicity
Indirect discrimination	Applying a provision, criterion or practice (PCP) that is neutral on its face but puts people with a protected characteristic at a particular disadvantage, unless it can be justified as a proportionate means of achieving a legitimate aim	Requiring all students to attend Saturday sessions without considering that this disadvantages students whose religious observance includes Saturday worship
Harassment	Unwanted conduct related to a protected characteristic that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment	A lecturer making racially offensive comments in class; a student subjected to homophobic abuse by fellow students
Victimisation	Treating someone badly because they have made or supported a complaint under the Equality Act 2010, or are suspected of doing so	Marking a student down because they complained about discriminatory treatment; giving a member of staff a negative appraisal because they raised an EDI concern
Failure to make reasonable adjustments	Failing to take steps to remove disadvantage experienced by a disabled person in comparison to a non-disabled person, where this is reasonable	Not providing an alternative format for a student with dyslexia; failing to make a building accessible for a wheelchair user
Pregnancy and maternity discrimination	Treating a woman unfavourably because of her pregnancy or maternity leave	Penalising a student's attendance record for pregnancy-related absences; excluding a pregnant staff member from a promotion process
Gender reassignment discrimination	Treating a trans person less favourably than others, including in relation to absence for gender reassignment treatment	Refusing to update a student's records to reflect their correct name and pronoun; disciplining a trans staff member for absence related to gender reassignment

Any behaviour that constitutes unlawful discrimination, harassment or victimisation under the Equality Act 2010 is also a breach of EDA College's disciplinary rules and may result in disciplinary action up to and including dismissal (for staff) or exclusion (for students). In some cases, unlawful conduct may also give rise to personal liability for the individual responsible.

7. The Public Sector Equality Duty (PSED)

As a higher education provider, EDA College is subject to the Public Sector Equality Duty (PSED) under section 149 of the Equality Act 2010. The PSED requires EDA College to have 'due regard' to the need to:

PSED Limb	What It Requires EDA College to Do
1. Eliminate discrimination, harassment and victimisation	Not merely prohibit these things in policy, but actively take steps to ensure they do not occur in the College's activities, including in the curriculum, in assessment, in recruitment, in the student experience and in the College's culture
2. Advance equality of opportunity	Take positive steps to address disadvantage experienced by people with protected characteristics; consider whether there are steps the College can take to meet different needs; encourage people with protected characteristics to participate in activities where their participation is disproportionately low
3. Foster good relations	Take steps to encourage mutual understanding, respect and positive engagement between people with different protected characteristics; tackle prejudice and promote positive attitudes; address causes of tension or conflict

The PSED is a duty to 'have due regard' — not a duty to achieve a particular outcome. However, having due regard means giving serious consideration to equality in decision-making, not treating it as a tick-box exercise. EDA College will demonstrate due regard through: Equality Impact Assessments (Section 15); the publication of Equality Objectives (Section 16); annual progress reporting; and the EDI monitoring data framework (Appendix D).

7.1 Specific PSED Duties

EDA College will fulfil the specific PSED duties by:

- Publishing Equality Objectives at least every four years and reporting progress annually
- Publishing information to demonstrate compliance with the PSED annually
- Ensuring Equality Impact Assessments are conducted on all significant new or revised policies and practices
- Publishing this Equality, Diversity and Inclusion Policy on the College website

8. Equality in Employment

EDA College is committed to being a fair and inclusive employer. We will ensure that equality is embedded throughout the full employment lifecycle:

8.1 Recruitment and Selection

- All job vacancies will be advertised widely and, in a manner, designed to attract a diverse range of candidates
- Person specifications and job descriptions will be reviewed for inadvertent barriers before advertising
- Shortlisting and interview panels will include at least two members and, wherever possible, will be gender-balanced
- Structured, competency-based interview questions will be used to ensure consistency and reduce unconscious bias
- Reasonable adjustments will be offered to all disabled candidates at every stage of the recruitment process
- Positive action may be used under section 159 of the Equality Act 2010 where two candidates are of equal merit and the College wishes to address under-representation of a group with a protected characteristic
- Anonymised shortlisting will be considered as a measure to reduce unconscious bias in recruitment

8.2 Pay and Benefits

- EDA College is committed to equal pay: all staff performing work of equal value will receive equal pay, regardless of any protected characteristic
- A pay structure that is transparent and based on objective criteria will be maintained
- EDA College will monitor its gender pay gap and take steps to address any significant gap
- The College will monitor pay by other protected characteristics (particularly ethnicity) as data quality improves

8.3 Training, Development and Promotion

- All training and development opportunities will be made available to all staff on an equitable basis
- EDA College will monitor participation in training and development by protected characteristic and take steps to address any significant under-representation
- Promotion and progression decisions will be based solely on merit, assessed against objective criteria
- The College will monitor promotion and progression outcomes by protected characteristic and investigate any significant disparities

8.4 Flexible and Supportive Working

- EDA College supports flexible working arrangements where this is operationally practicable, recognising that flexible working supports staff with caring responsibilities, disabilities and other needs linked to protected characteristics
- EDA College will ensure that policies on maternity, paternity, adoption, shared parental leave, and other parental rights are implemented consistently and fairly
- Reasonable adjustments to working arrangements will be considered promptly for disabled staff or staff experiencing circumstances linked to a protected characteristic

8.5 Preventing Workplace Discrimination and Harassment

- EDA College will not tolerate discrimination, harassment or victimisation of any member of staff in the workplace or in any work-related context
- All allegations of workplace discrimination or harassment will be investigated promptly, confidentially and fairly under the Disciplinary and Grievance Procedure
- Staff who raise concerns about discrimination or harassment in good faith will not be subjected to any detriment as a result

9. Equality in Education and Student Life

EDA College is committed to ensuring that every student, regardless of their protected characteristics, has an equal opportunity to access, succeed in and progress from their studies. We will address inequality at every stage of the student lifecycle:

9.1 Admissions

- EDA College's admissions process will be fair, transparent and free from discrimination on the basis of any protected characteristic
- The College's Admissions Policy will include contextual admissions provisions to recognise the achievements of applicants from disadvantaged backgrounds
- EDA College will monitor admissions outcomes by protected characteristic and investigate any significant disparities
- Reasonable adjustments will be made for disabled applicants at every stage of the admissions process

9.2 Teaching, Learning and Assessment

- The curriculum will be reviewed to ensure it is inclusive, free from stereotyping and reflective of diverse perspectives and experiences
- Assessment methods will be reviewed to ensure they do not inadvertently disadvantage students with particular protected characteristics
- Teaching staff will receive training in inclusive pedagogy and culturally responsive teaching
- Academic feedback will be constructive, consistent and free from bias
- The College will monitor assessment outcomes by protected characteristic and investigate and address any significant attainment gaps

9.3 Student Support and Wellbeing

- Student support services will be accessible to all students, with specific outreach to groups that are less likely to seek support
- Wellbeing services will be culturally sensitive and responsive to the diverse needs of EDA College's student community
- EDA College will ensure that students with disabilities receive appropriate support, including reasonable adjustments, in a timely manner
- The College will develop specific support provision for students with caring responsibilities, mature students, and students from low-income households

9.4 Student Experience and Representation

- EDA College will ensure that students from all backgrounds are represented in the Student Guild and in College decision-making processes
- The College will actively seek feedback from students from underrepresented groups on their experience of studying at EDA College
- Cultural, religious and social events and activities will be planned with the diversity of the student community in mind
- The College will mark significant dates in the EDI calendar (e.g. Black History Month, Disability History Month, Pride Month, Islamophobia Awareness Month) with meaningful activity, not merely tokenistic gestures

10. Accessibility and Reasonable Adjustments

10.1 Disability and Reasonable Adjustments

Under the Equality Act 2010, EDA College has a duty to make reasonable adjustments for disabled students and staff to remove substantial disadvantage. The duty to make adjustments is anticipatory — the College must consider what adjustments may be needed by disabled people in general and put these in place proactively, not wait until a specific disabled person requests them.

EDA College's approach to reasonable adjustments includes:

- Publishing clear information about the process for requesting adjustments and the support available
- Ensuring that students disclose disability at the earliest opportunity so that adjustments can be put in place before assessments
- Reviewing assessment arrangements (e.g. extra time, alternative formats, rest breaks) on a case-by-case basis in consultation with the student
- Ensuring that teaching materials are available in accessible formats on request
- Reviewing and improving the physical accessibility of College premises on an ongoing basis
- Ensuring that the College's digital systems and website are accessible to people with disabilities (WCAG 2.1 AA)
- Ensuring that staff who work with disabled students receive appropriate training

10.2 Anticipatory Adjustments

EDA College will proactively review its estate, teaching arrangements, assessment practices and communications to identify and remove barriers to participation by disabled people, without waiting for individual requests. This may include:

- Ensuring all teaching rooms are step-free accessible
- Providing captioning or transcription for online teaching and recorded content
- Offering alternative assessment formats as a standard option for all modules
- Reviewing font sizes, colour contrast and document formats used in College communications

10.3 Digital Accessibility

EDA College is committed to ensuring that its website, VLE (Moodle) and all digital content meet the requirements of the Public Sector Bodies Accessibility Regulations 2018 (WCAG 2.1 AA). An Accessibility Statement will be published on the College website and updated annually.

11. Harassment, Bullying and Victimisation

11.1 Zero Tolerance

EDA College has a zero-tolerance approach to harassment, bullying and victimisation. Any behaviour that violates the dignity of a member of the College community, whether related to a protected characteristic or not, is unacceptable and will be treated as a serious matter.

11.2 What Constitutes Harassment

Harassment under the Equality Act 2010 is unwanted conduct related to a protected characteristic that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment. EDA College also prohibits bullying — which is persistent, offensive, abusive or intimidating behaviour that may not be related to a protected characteristic but which undermines, humiliates or injures a person.

Examples of harassment and bullying include:

- Racial or ethnic abuse, slurs, or derogatory comments, including in the classroom, in the workplace, or online
- Sexual harassment, including unwanted physical contact, sexual comments, or sexual messages
- Homophobic, biphobic or transphobic language or behaviour
- Disability-related mockery or unkind comments
- Religious ridicule or intolerance
- Online or social media harassment related to any protected characteristic
- Isolation, exclusion or deliberate targeting of a person because of a protected characteristic

11.3 Reporting and Response

- Any person who experiences or witnesses harassment, bullying or victimisation should report it as soon as possible
- Students should report concerns to the **Manager of Student Services** or the Academic Registrar
- Staff should report concerns to their line manager or the **Manager of Finance / HR**
- All reports will be treated confidentially and investigated promptly and fairly
- Investigators will be independent of both the complainant and the respondent
- The complainant will be kept informed of progress and outcome
- Substantiated complaints will result in disciplinary action, which may include dismissal or exclusion
- No person who reports a concern in good faith will be subjected to any detriment

11.4 Third-Party Harassment

EDA College will take reasonable steps to protect its staff and students from harassment by third parties, including visiting speakers, contractors, employers and members of the public. Where third-party harassment is reported, the College will take appropriate action, which may include terminating or restricting the individual's access to College premises or activities.

12. Positive Action

EDA College recognises that, in some cases, treating everyone the same is not sufficient to achieve genuine equality. The College will use positive action measures to address underrepresentation and disadvantage where this is permitted and appropriate under the Equality Act 2010.

Positive action is not the same as positive discrimination. Positive discrimination (treating someone more favourably solely because of a protected characteristic) is unlawful in most circumstances. Positive action involves taking targeted, proportionate steps to help people from disadvantaged groups compete on an equal footing.

Examples of positive action EDA College may use:

- Targeted outreach to communities that are underrepresented in higher education
- Mentoring programmes for students from BAME, low-income or other underrepresented backgrounds
- Contextual admissions arrangements that take account of an applicant's educational context
- Targeted careers support for students whose graduate employment outcomes are below average

- Encouraging applications from underrepresented groups for staff vacancies through targeted advertising
- Using the tie-break provision under section 159 of the Equality Act 2010 in recruitment, where two candidates are of equal merit and one belongs to an underrepresented group

13. EDI in Procurement and External Relationships

EDA College is committed to ensuring that its commitment to EDI extends beyond its own operations to its relationships with suppliers, partners and other external organisations. The College will:

- Include EDI requirements in procurement specifications and contracts where relevant, particularly for suppliers of student-facing services
- Assess the EDI policies and track record of significant new suppliers as part of the due diligence process
- Encourage and support suppliers to improve their EDI practices
- Ensure that employer partners are aware of EDA College's EDI commitments and that placements and work experience opportunities are delivered in a manner consistent with this policy
- Consider the EDI implications of new partnerships and academic collaborations
- Work with Birmingham Newman University and other academic partners to share good EDI practice and to align approaches where possible

14. EDI in Governance

EDA College's Academic Board is committed to leading by example on EDI. The governance arrangements relating to EDI are:

- The EDI Group (a committee of the Board) provides oversight of EDA College's EDI strategy and performance, and reports to the Board twice yearly
- The Board receives an annual EDI report, including disaggregated student and staff data and progress against Equality Objectives
- The Academic Board is committed to improving its own diversity, with the aim of ensuring that the composition of the Board reflects the diversity of the communities EDA College serves
- The Remuneration Committee will monitor Board diversity data and take active steps to address imbalance in Board composition
- All governors will receive EDI training on appointment and annually thereafter
- Equality Impact Assessments will be conducted on all significant governance decisions where equality implications exist
- EDA College will publish Board diversity data as part of its annual transparency reporting

15. Equality Impact Assessments

An Equality Impact Assessment (EIA) is a structured process for identifying and addressing the equality implications of a proposed or existing policy, procedure, practice or significant decision. EDA College will conduct an EIA for:

- All new or significantly revised policies and procedures
- Significant changes to the curriculum or assessment arrangements
- Significant changes to student support services
- Significant changes to staffing or HR arrangements
- Capital projects or significant changes to College premises
- Any other decision identified by the **EDI lead** as warranting an EIA

The EIA process involves:

1. Identifying the policy or decision to be assessed and the population it affects
2. Gathering evidence about the likely differential impact on groups with protected characteristics
3. Identifying any potential for adverse impact or unlawful discrimination
4. Identifying steps to mitigate adverse impacts or enhance positive impacts
5. Recording the assessment and the decisions taken

6. Monitoring the implemented policy or decision and reviewing the EIA if circumstances change

An EIA template is provided at Appendix B. Completed EIAs will be reviewed by the **EDI lead** before a policy is finalised, and will be made available to the EDI Group and the Board. Significant EIAs will be published on the College website.

16. Equality Objectives 2026–2030

In accordance with the specific duties under the Equality Act 2010 (Public Sector Equality Duty), EDA College will publish and pursue a set of Equality Objectives covering the period 2026–2030. These objectives have been developed with reference to the College's equality monitoring data, student outcome data, staff experience and the priorities of the Access and Participation Plan.

Objective	Focus Area	Target Group(s)	Target Date	Success Measure
1. Close the BAME attainment gap	Reduce the gap in continuation, completion and progression rates between BAME and White students	Black, Asian and ethnic minority students	2030	BAME attainment gap reduced by at least 50% against 2026/27 baseline
2. Improve disabled student outcomes	Increase the continuation and completion rates of declared disabled students to at or above the College average	Disabled students	2029	No significant continuation gap between disabled and non-disabled students
3. Increase Black academic staff representation	Increase the proportion of academic staff from Black backgrounds to better reflect the student community	Black staff	2030	Increase in Black academic staff representation (baseline to be established 2026/27)
4. Eliminate the gender pay gap	Identify and address the drivers of any gender pay gap in academic and professional services staff	All staff	2028	Gender pay gap reduced to below 5% (or eliminated where feasible)
5. Improve support for students with caring responsibilities	Develop and implement targeted support for students who have caring responsibilities, to reduce withdrawal rates	Students with caring responsibilities	2028	Withdrawal rate for students with caring responsibilities reduced to College average
6. Achieve full digital accessibility	Ensure all College digital content meets WCAG 2.1 AA accessibility standards	Disabled students and staff	2027	Accessibility Statement published; all key digital content WCAG 2.1 AA compliant
7. Improve staff EDI experience	Improve staff survey results on EDI, inclusion and belonging	All staff, particularly those from underrepresented groups	2028	EDI satisfaction ratings in annual staff survey above 80%
8. Develop inclusive curriculum	Review and update all programme curricula to ensure inclusive, diverse and non-stereotyping content	All students	2028	All programme specifications reviewed; inclusive curriculum commitments embedded

A full Equality Objectives Action Plan, with named leads, milestones and resource commitments, is set out in Appendix C.

17. Monitoring, Data and Reporting

17.1 Equality Monitoring Data

EDA College will collect, analyse and publish data on the experience and outcomes of students and staff disaggregated by protected characteristic. This data is essential for identifying inequality, targeting interventions and demonstrating PSED compliance.

17.2 Student Data

EDA College will monitor and publish the following student data by protected characteristic (at minimum: ethnicity, disability, sex and age):

- Applications and admissions rates
- Enrolment and continuation rates
- Assessment outcomes and attainment
- Completion and award rates
- Progression to employment and further study
- Student satisfaction (NSS-equivalent survey results)
- Complaints, appeals and disciplinary outcomes
- Access to student support services

17.3 Staff Data

EDA College will monitor and publish the following staff data by protected characteristic:

- Workforce composition (headcount and FTE by grade and role)
- Recruitment and selection outcomes
- Pay and grading
- Training and development participation
- Promotion and progression outcomes
- Disciplinary and grievance outcomes
- Absence and turnover rates

17.4 Governance Data

EDA College will monitor and publish data on the diversity of its Academic Board and committees, including data on sex, ethnicity and disability.

17.5 Reporting

Report	Audience	Frequency	Content
Annual EDI Report	Academic Board	Annual	Disaggregated student and staff data; progress against Equality Objectives; EIA summary; actions for the coming year
Equality Objectives Progress Report	EDI College; Board; Published on website	Annual	Progress against each Equality Objective; updated targets and actions
PSED Compliance Statement	Published on website	Annual	Statement of compliance with the PSED specific duties
Student outcome data (disaggregated)	Academic Committee; Quality Board; Published	Termly (internally); annually (published)	Continuation, completion and progression data by protected characteristic
Workforce diversity data	Remuneration Committee; Board	Annual	Workforce composition by protected characteristic; pay gap data
OfS/HESA statutory returns	OfS; HESA	Annual (or as required)	Student and staff data as required by OfS and HESA

18. Responsibilities

Role	EDI Responsibilities
Academic Board	Ultimate accountability for EDA College's compliance with equality legislation and the PSED. Approve this policy and the Equality Objectives. Receive annual EDI report. Ensure Board composition reflects diversity commitments. Champion EDI through personal conduct and governance decisions.
EDI Group (Board Committee)	Oversee implementation of the EDI Policy and Equality Objectives. Review disaggregated student and staff data. Monitor progress against targets. Report to Board twice yearly. Advise the Board on EDI risks and opportunities.
Principal	Lead institution-wide EDI culture and strategy. Ensure this policy is implemented effectively across all College activities. Appoint an EDI lead. Report EDI performance to the Board. Model inclusive leadership.
EDI Lead	Day-to-day management of EDA College's EDI agenda. Coordinate Equality Impact Assessments. Maintain the Equality Objectives Action Plan. Lead EDI training. Support the EDI Group. Maintain EDI monitoring data. Advise staff, students and governors on EDI matters.
Vice Principal (Academic)	Ensure equality is embedded in the curriculum, assessment, teaching practice and student experience. Monitor academic outcome data by protected characteristic. Lead on inclusive curriculum development. Support academic staff in inclusive pedagogy.
Manager of Student Services	Ensure equality and accessibility in all student support services. Lead on disability support and reasonable adjustments. Monitor student wellbeing data by protected characteristic. Ensure student-facing staff are trained in EDI.
Manager of Finance / HR	Ensure equality in all employment practices. Monitor workforce diversity data. Oversee the gender pay gap report. Ensure EDI is embedded in recruitment, appraisal and development processes.
All managers	Apply this policy consistently in their areas of responsibility. Complete EDI training. Conduct EIAs where relevant. Challenge discriminatory behaviour. Support team members who raise EDI concerns.
All academic staff	Deliver inclusive teaching and learning. Apply fair and consistent assessment. Model respectful and inclusive behaviour. Complete EDI training. Report discriminatory behaviour.
All staff	Act in accordance with this policy at all times. Complete mandatory EDI training. Treat all colleagues, students and visitors with dignity and respect. Report discrimination, harassment or victimisation.
Students	Act in accordance with this policy in all College activities. Treat fellow students, staff and visitors with dignity and respect. Report discrimination or harassment they experience or witness.

19. Complaints and Enforcement

19.1 Students

Students who believe they have been subjected to discrimination, harassment or victimisation on the basis of a protected characteristic may raise a complaint through EDA College's Student Complaints and Academic Appeals Procedure. Where the matter involves alleged unlawful discrimination, students may also:

- Contact the Equality and Human Rights Commission (EHRC) for advice and support
- Bring a claim in the county court under the Equality Act 2010
- Contact the Office for Students where the concern relates to compliance with OfS conditions

19.2 Staff

Members of staff who believe they have been subjected to discrimination, harassment or victimisation may raise the matter through the College's Disciplinary and Grievance Procedure. If the matter is not resolved internally, staff may:

- Bring a claim to an Employment Tribunal under the Equality Act 2010 (normally within 3 months of the act complained of)
- Contact the Equality and Human Rights Commission for advice
- Raise the matter as a whistleblowing concern under the College’s Whistleblowing Policy, where the concern is in the public interest

19.3 Sanctions

Any staff member, student or governor found to have engaged in unlawful discrimination, harassment or victimisation will be subject to disciplinary action. The severity of the sanction will reflect the seriousness of the conduct and may include:

- A formal written warning
- Mandatory EDI training and a period of review
- Demotion or change of role (for staff)
- Suspension or exclusion from College premises
- Dismissal from employment or exclusion from the College
- Referral to the police where the conduct may constitute a criminal offence (e.g. racially or religiously aggravated harassment)

20. Training and Awareness

EDA College is committed to ensuring that all members of the College community have the knowledge and skills to contribute to an inclusive environment. The following training and awareness activities will be delivered:

Training Activity	Audience	Frequency	Lead
EDI induction (mandatory)	All new staff and governors	On joining	EDI lead / HR
Annual EDI refresher	All staff and governors	Annually	EDI lead
Unconscious bias training	All staff involved in recruitment, assessment or student support decisions	On taking up the role; refreshed every 3 years	EDI lead / External provider
Inclusive pedagogy and culturally responsive teaching	All academic staff	On joining; refreshed every 2 years	Vice Principal (Academic) / EDI lead
Disability awareness and reasonable adjustments	All staff; enhanced training for student-facing staff	On joining; refreshed every 2 years	Manager of Student Services / EDI lead
EDI for governors	All governors	On appointment; annually	EDI lead / Principal
Harassment and bullying prevention	All staff and students	At induction; annually via student communications	EDI lead / Manager of Student Services
Equality Impact Assessment training	All staff who conduct EIAs (managers and policy leads)	Before conducting first EIA; refreshed when required	EDI lead

Training completion is recorded and reported to the EDI Group and the Board annually. Mandatory training not completed within the required timeframe may result in restricted access to relevant responsibilities until training is complete.

21. Related Policies

Policy	Relationship to This Policy
Access and Participation Plan	Sets out specific commitments and targets for improving outcomes for underrepresented groups; the APP and this EDI Policy must be read and implemented together

Student Complaints and Academic Appeals Procedure	Provides the route for students to raise complaints about discrimination or unfair treatment
Disciplinary and Grievance Procedure (Staff)	Provides the route for staff to raise EDI-related grievances and for the College to address EDI-related misconduct
Student Terms and Conditions	Sets out EDA College’s commitment to equality and the student’s right to an inclusive environment
Data Protection and Privacy Policy	Governs how EDA College collects, uses and publishes equality monitoring data
Freedom of Speech and Academic Freedom Policy	Establishes the relationship between free speech rights and the duty to protect people from harassment and discrimination
Governance Framework	Sets out the Board’s EDI responsibilities and the role of the EDI Group
Health and Safety Policy	Addresses physical safety, which intersects with disability access and equality
Staff Recruitment and Selection Policy	Implements EDA College’s commitment to fair and inclusive recruitment practices
Safeguarding Policy	Protects vulnerable individuals, including those at risk because of protected characteristics

22. Monitoring, Review and Governance

This policy will be reviewed annually by the EDI lead in consultation with the Principal and EDI College, and updated as necessary to reflect changes in legislation, OfS guidance, or the College’s circumstances. Material changes require approval by the Academic Board.

Governance Activity	Lead	Frequency
Annual policy review and update	EDI lead	Annual (August)
Board approval of material changes	Academic Board	As required
Annual EDI Report to Board	EDI lead / Principal	Annual
Equality Objectives progress report to Board	EDI lead	Annual; published on website
EDI Group meeting and report to Board	EDI Group Chair	Twice yearly (minimum)
Publication of PSED compliance statement	EDI lead / Academic Registrar	Annual (on website)
Equality Impact Assessments	EDI lead + Policy Leads	As new policies/decisions arise
Staff EDI training completion report	EDI lead / HR	Annual (to EDI Group and Board)
Disaggregated student outcome data review	Academic Quality Committee	Termly
Workforce diversity data review	Remuneration Committee	Annual
External EDI benchmarking	EDI lead	Every 2 years

Appendix A: Definitions of Unlawful Conduct Under the Equality Act 2010

This appendix provides detailed definitions of each type of unlawful conduct prohibited under the Equality Act 2010, for reference by staff, students and governors.

Type	Legal Definition (simplified)	Key Points
Direct discrimination (s.13)	Treating person A less favourably than person B because of a protected characteristic	Includes discrimination by association (because A is associated with someone who has the characteristic) and by perception (because A is wrongly perceived to have the characteristic). No justification is possible for direct discrimination based on most characteristics (exception: age).
Indirect discrimination (s.19)	Applying a PCP to everyone that puts persons with a protected characteristic at a particular disadvantage, which cannot be justified as a proportionate means of achieving a legitimate aim	The PCP need not be intentional. The key question is effect. Justification is possible if the PCP serves a legitimate aim and the means are proportionate.
Harassment (s.26)	Unwanted conduct related to a protected characteristic that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment	Also covers sexual harassment and conduct of a sexual nature. Third-party harassment is also covered in certain circumstances. The test is partly subjective (effect on the recipient).
Victimisation (s.27)	Subjecting a person to a detriment because they have done, or are suspected of doing, a 'protected act' (e.g. making a discrimination complaint, giving evidence in a discrimination case)	Does not require a protected characteristic. A person can be victimised even if their original discrimination complaint was unsuccessful.
Failure to make reasonable adjustments (ss.20-21)	Failure to take reasonable steps to avoid a substantial disadvantage experienced by a disabled person in comparison to a non-disabled person	The duty is anticipatory. What is 'reasonable' depends on the nature of the adjustment, its cost and practicability, and the employer's/provider's resources.
Pregnancy / maternity discrimination (ss.17-18)	Unfavourable treatment of a woman because of her pregnancy, pregnancy-related illness, or maternity leave	In employment, the protected period is the duration of pregnancy and maternity leave. In education, it is the period of pregnancy and 26 weeks after the birth. No comparator is needed.
Gender reassignment discrimination (s.16)	Less favourable treatment of a trans person, including in relation to absence for gender reassignment treatment	A person does not need medical treatment to be protected; proposing to undergo gender reassignment is sufficient.

Appendix B: Equality Impact Assessment Template

Complete this template for all new or significantly revised policies, procedures or significant decisions. Submit the completed EIA to the EDI lead for review before the policy is finalised.

SECTION 1: OVERVIEW			
Policy / decision title			
Brief description of the policy / decision			
Who is affected?			
Person completing this EIA			
Date of EIA			
Date of review by EDI Lead			
SECTION 2: EVIDENCE GATHERED			
What data / evidence is available about the impact on different groups?			
What does this evidence tell you about potential differential impact?			
What consultation has been undertaken with affected groups?			
SECTION 3: IMPACT ASSESSMENT BY PROTECTED CHARACTERISTIC			
Characteristic	Potential Adverse Impact?	Potential Positive Impact?	Action Required
Age	Yes / No / Unclear	Yes / No / Unclear	
Disability	Yes / No / Unclear	Yes / No / Unclear	
Gender reassignment	Yes / No / Unclear	Yes / No / Unclear	
Marriage / civil partnership	Yes / No / Unclear	Yes / No / Unclear	
Pregnancy / maternity	Yes / No / Unclear	Yes / No / Unclear	
Race	Yes / No / Unclear	Yes / No / Unclear	
Religion or belief	Yes / No / Unclear	Yes / No / Unclear	
Sex	Yes / No / Unclear	Yes / No / Unclear	
Sexual orientation	Yes / No / Unclear	Yes / No / Unclear	
SECTION 4: MITIGATION AND ENHANCEMENTS			
What steps will be taken to mitigate any adverse impacts?			
What steps will be taken to enhance positive impacts?			
Are there any residual risks that cannot be fully mitigated?			

SECTION 5: DECISION AND SIGN-OFF	
Overall impact assessment	Positive / Neutral / Adverse (mitigated) / Adverse (unmitigated)
Decision (proceed / modify / do not proceed)	
Monitoring arrangements (how will impacts be monitored post-implementation?)	
Signature (EDI Lead)	Date:
Principal sign-off (required for significant adverse impact)	Date:

Appendix C: Equality Objectives Action Plan 2026–2030

Objective	Action	Lead	Timeline	Resource	Success Measure
1. Close BAME attainment gap	Establish baseline attainment data disaggregated by ethnicity for all programmes	Academic Registrar	2026/27	Staff time	Baseline report produced
1. Close BAME attainment gap	Introduce peer mentoring programme for Black students	Dir. Student Services	2027/28	Student Services budget	Mentoring programme launched; uptake data collected
1. Close BAME attainment gap	Conduct root cause analysis of BAME attainment gap with students	EDI lead + AQC	2026/27	Staff time	Qualitative research report produced
1. Close BAME attainment gap	Embed culturally responsive teaching across all programmes	VP Academic	2027/28	CPD budget	All academic staff trained; curriculum review completed
2. Improve disabled student outcomes	Audit current reasonable adjustments provision and identify gaps	Dir. Student Services	2026/27	Staff time	Audit report and improvement plan produced
2. Improve disabled student outcomes	Introduce proactive disability disclosure process at application	Academic Registrar	2026/27	Systems time	Disclosure rates tracked; adjustments in place pre-start
3. Increase Black staff representation	Publish workforce diversity data (baseline) for 2026/27	Dir. Finance / HR	2026/27	Staff time	Baseline data published
3. Increase Black staff representation	Review recruitment processes for barriers to Black applicants	EDI lead + HR	2027/28	Staff time + external review	Revised recruitment guidance in place
4. Eliminate gender pay gap	Conduct gender pay gap analysis	Dir. Finance / HR	2026/27	Staff time	Gender pay gap report published
5. Support students with caring responsibilities	Survey to identify size and needs of students with caring responsibilities	Dir. Student Services	2026/27	Staff time	Survey results and support plan produced
6. Digital accessibility	Audit website and VLE against WCAG 2.1 AA	IT Manager	2026/27	IT budget	Accessibility Statement published; remediation plan in place
7. Staff EDI experience	Introduce annual staff EDI survey	EDI lead / HR	2026/27	Staff time	Baseline survey results published; action plan produced
8. Inclusive curriculum	Develop inclusive curriculum review framework	VP Academic + EDI lead	2027/28	Staff time	Framework approved; review cycle commenced

Appendix D: EDI Monitoring Data Framework

This framework sets out the minimum EDI monitoring data that EDA College will collect, analyse and publish. Data will be disaggregated by the protected characteristics listed below, where collection is lawful, ethical and of sufficient quality to be meaningful.

Data Category	Protected Characteristics Monitored	Collected How	Published Where / When
Student applications	Ethnicity, sex, disability, age	UCAS/application form	Annual EDI report
Student admissions / enrolment	Ethnicity, sex, disability, age	Enrolment form	Annual EDI report
Student continuation rates	Ethnicity, sex, disability, age	Student records system	Annual EDI report; OfS return
Student assessment outcomes	Ethnicity, sex, disability, age	Assessment records	Annual EDI report (anonymised)
Student completion and awards	Ethnicity, sex, disability, age	Student records system	Annual EDI report; OfS return
Student progression outcomes	Ethnicity, sex, disability, age	Graduate Outcomes Survey	Annual EDI report; OfS return
Student satisfaction	Ethnicity, sex, disability, age	NSS-equivalent survey	Annual EDI report
Student complaints and appeals	Ethnicity, sex, disability, age (where disclosed)	Complaints log	Annual EDI report (aggregated)
Workforce composition	Ethnicity, sex, disability, age, religion, sexual orientation (voluntary)	HR records / diversity monitoring form	Annual EDI report
Recruitment outcomes	Ethnicity, sex, disability	Shortlisting and appointment records	Annual EDI report (aggregated)
Pay and grading	Sex, ethnicity (where sufficient numbers)	Payroll records	Gender pay gap report; Annual EDI report
Training participation	Sex, ethnicity, disability	Training records	Annual EDI report (aggregated)
Promotion and progression	Sex, ethnicity, disability	HR records	Annual EDI report (aggregated)
Board composition	Sex, ethnicity, disability, age	Governor diversity survey (voluntary)	Annual transparency report; Board EDI report

All equality monitoring data will be collected voluntarily where not already required for other purposes, will be stored and processed in accordance with UK GDPR and the Data Protection and Privacy Policy, and will only be published in anonymised or aggregated form where individual identification is possible. Where data volumes are too small to report (fewer than 5 in a category), data will be suppressed to protect individual confidentiality.

Approved by the Academic Board of EDA College | August 2025

This policy is reviewed annually. The current version is always available on the College website.

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