

Equality, Diversity and Inclusion Policy

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The Equality, Diversity and Inclusion Policy will be reviewed annually by our Equality, Diversity and Inclusion Committee. Any amendments require the approval of our Board of Directors.

1. Introduction

We are committed to creating and sustaining a positive and mutually supportive environment where all staff and students are equally valued and respected, and encouraged to thrive. We value the diversity within our academic community and the huge range of experience and perspective that this brings. The appreciation of diversity and the equitable treatment of all are among our core values, underpinning our success as a community of scholars.

We are committed to promoting and advancing equality, diversity (and an equal society) and inclusion as key features within all our activities, as we believe this to be ethically right and socially responsible. It is also crucial in the context of our Prevent duties since by treating all equally and making them feel included we are mitigating the risk of radicalisation¹. Equality, diversity and inclusion are essential factors that contribute to the academic and economic strengths of our institution. We therefore strive to look beyond our legal obligations, as set out in the Equality Act 2010, in order to embed equality, diversity and inclusion within our organisational culture for the benefit of staff, students and applicants irrespective of whether or not they share any of the characteristics protected under the Act². In this way we aim to create an equal society that:

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

2. Commitment to equality, diversity and inclusion

Our commitment to the concepts of equality, diversity and inclusion is reflected within our objects, as set out in **Regulation 3(d)** of our Articles of Association as follows:

- to actively promote and apply equality, diversity and inclusion throughout the company, and to promote an inclusive teaching and learning environment

The above object is embedded within the Terms of Reference for all our key decision-making committees.³

Our approach demonstrates that equality considerations are at the heart of everyday activities. We are committed to promoting an equal, diverse and inclusive academic community, as we believe this to be ethically right and socially responsible. Equality, diversity and inclusion are essential tenets that contribute to the academic and economic strength of our institution. We believe that excellence will be achieved through recognising the value of every individual.

We aim to create an environment that respects the diversity of staff and students and enables them to attain their full potential to contribute fully, and to derive maximum benefit and enjoyment from their involvement in the life of our institution. To this end, we acknowledge the following basic rights for all members and prospective members of our community:

- to be treated with respect and dignity;

¹ Our Prevent duties focus on eliminating radicalisation on campus. Inclusion is crucial to minimising radicalisation.

² The protected characteristics are age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership and pregnancy and maternity.

³ Our key decision-making committees include our Board of Directors, Senior Management and Leadership Team, Academic Committee, Quality Assurance and Enhancement Committee, and Course Committees.

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

Committed as we are to treating everyone with dignity and respect, we take a zero-tolerance approach to hate crime or harassment of any kind. This includes displays of antisemitism⁴ or Islamophobia, for example.

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

3. Responsibility

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

In addition, specific responsibilities are assigned to our Board of Directors, our Senior Management Team, our Equality, Diversity and Inclusion Committee, our Head of Governance and Company Secretary, and our Compliance Officer and Equality, Diversity and Inclusion Lead.

3.1 Board of Directors

Our Board of Directors⁵ has overall responsibility for ensuring that we operate within a framework of equality of opportunity. This is clearly articulated in our [Articles of Association](#)⁶ and [Corporate and Academic Governance Framework](#) (CAGF)⁷ with the latter listing the following particular Board responsibilities:

- Approving the Equality, Diversity and Inclusion Policy upon a recommendation of the Equality, Diversity and Inclusion Committee
- Receiving the following for consideration and action:
 - minutes of the Equality, Diversity and Inclusion Committee
 - Equality, Diversity and Inclusion Reports
 - Equality, Diversity and Inclusion Annual Reports

3.2 Senior Management Team

Operational oversight for equality, diversity and inclusion (in terms of facilitating developments and communicating responsibilities to our staff and students) rests with our Senior Management Team who are responsible for:

⁴ We have adopted the [IHRA working definition of antisemitism](#).

<https://www.holocaustremembrance.com/resources/working-definitions-charters/working-definition-antisemitism>

⁵ All Directors on the Board are required under **Regulation 44** of our Articles of Association to “have a positive commitment to embrace and comply with the company’s Equality, Diversity and Inclusion Policy.”

⁶ <https://www.bil.ac.uk/qem/section-1/>

⁷ <https://www.bil.ac.uk/qem/section-1/>

- Receiving Equality, Diversity and Inclusion Committee minutes for consideration where a matter has been referred to the Senior Management Team (otherwise they will be made available online for information only)
- Receiving Equality, Diversity and Inclusion Reports for consideration
- Receiving the Annual Equality, Diversity and Inclusion Report for consideration

3.3 Equality, Diversity and Inclusion Committee

In order to ensure that we continue to operate with equality, diversity and inclusion at the heart of our activities, we have established an Equality, Diversity and Inclusion Committee (EDIC), comprising staff and student representation. See **Appendix A** for details of its Terms of Reference. Designated members of the committee also provide staff and students with a confidential forum for them to raise any equality and diversity issues or concerns they might have. See Appendix B for details. In addition, we have made the Equality, Diversity and Inclusion Policy one of the core compulsory documents that staff are required to read upon joining our organisation. The same is also true of our [Dignity and Respect Policy](#) and our [Harassment and Sexual Misconduct Policy](#).⁸ Equality, diversity and inclusion issues are also covered in the Student Charter which is circulated to all students at the start of their course.

It is our Equality, Diversity and Inclusion Committee (EDIC) that is responsible for reviewing this policy and presenting any amendments to the Board of Directors for approval. The EDIC will, from time to time, supplement this policy with codes of practice or guidelines on behaviour (e.g. our Unconscious Bias Guidance Notes which are also one of the key company documents all staff are required to read).

4. Head of Governance and Company Secretary

Our Head of Governance and Company Secretary (who reports directly to the Managing Director and Academic Principal) is responsible for overseeing the equality, diversity and inclusion agenda. This involves promoting, applying, and ensuring compliance with the Equality Act 2010 and the Institute's Equality, Diversity and Inclusion Policy, and making a full and positive contribution to the implementation, evolution and enhancement of the Institute's Inclusive Learning Environment

5. Implementation and enforcement

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

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

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

This Equality, Diversity and Inclusion Policy is available to our staff and students (and potential staff and students) both in hard copy and electronic copy. If you require this document in an alternative format, please contact our Disability and Wellbeing Office at disability@bil.ac.uk or call +44(0) 207 078 8796.

6. Discrimination

Under the Equality Act 2010, it is unlawful to discriminate, harass or victimise someone because they have or are perceived to have a 'protected characteristic' or are associated with someone who has a

⁸ <https://www.bil.ac.uk/qem/policies/>

protected characteristic. There are a number of different types of discrimination⁹.

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

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

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

Failing to make reasonable adjustments: this means failing to remove or minimise disadvantages experienced by people with a disability when it would have been reasonable to do so.

Harassment: this is unwanted behaviour related to a protected characteristic which has the purpose or effect of violating someone's dignity or which creates a hostile, degrading, humiliating or offensive environment. Unwanted behaviour could include: spoken or written abuse; offensive emails; tweets or comments on websites and social media; images and graffiti; physical gestures; facial expressions; banter that is offensive to the person at whom it is directed.

Victimisation: is treating someone unfavourably because they have taken some form of action relating to the Equality Act 2010, e.g. made a complaint under the Act or supported someone who is doing so, such as appearing as a witness.

7. Application of the policy: staff

7.1 Recruitment and selection

Detailed information on how we apply our commitment to equality and diversity to the recruitment and development of staff can be found in our [Staff Recruitment and Development Policy](#)¹⁰. However, the key areas to note from the policy are as follows:

- Posts will be advertised in such media that are appropriate to the audience, that are likely to produce the best candidates (subject to budget considerations) and that will encourage applications from all sectors of the community, thereby reflecting our commitment to equality and diversity. All adverts will include the following statement: We are committed to being an equal opportunities employer. Some advertisements may also reference that we are under-represented in particular groups of individuals in specific areas of our Institute.
- Job Descriptions, Person Specifications and recruitment advertisements will be written on the basis of the essential and justifiable requirements of the position. Our Disability and Wellbeing Manager will review Job Descriptions and Person Specifications before finalisation in order to identify and address any issues that might prevent or deter a person with a disability from applying for the job. The Disability and Wellbeing Manager's contact details are also provided at the end of the Job Description should anyone need the documentation in a different format, to ask for support or to discuss any issues around reasonable adjustments.

⁹ These definitions are provided by a guidance note issued by ACAS.

¹⁰ <https://www.bil.ac.uk/qem/policies/>

- Shortlisting, appointment and rejection decisions will be transparent and justifiable and will be supported by written comments. To avoid any unintended or unconscious bias, shortlisting will be carried out by at least two people and one of these will normally be the Line Manager to which the successful applicant will report. In addition, members of all shortlisting and interview Panels will be required to re-read our Unconscious Bias Guidance Notes¹¹. When determining shortlisting (and selection) panels, due consideration will also be given to the promotion of equality and diversity.
- If an applicant with a disability meets the essential criteria for the job (as set out within the Person Specification), they will be provided with the opportunity to demonstrate their abilities at an interview under our Guaranteed Interview Scheme.
- Subject to the provisions within our Staff Recruitment and Development Policy, we will not deny an applicant the opportunity to better their life through employment on the grounds that the applicant has a criminal conviction. The following is the only exception to this:
 - Some posts may involve frequent working with students with a disability, specific learning difficulty and/or long-term health condition, to provide them with advice and support. For this category of post, if an offer of employment is made, this offer will be made conditional on providing an enhanced Disclosure and Barring Service (DBS) certificate. If any convictions are disclosed on the certificate, we would make an assessment to determine whether the convictions are such that, from a safeguarding perspective, the applicant could put the wellbeing of our students in danger. If such a certificate is required, we will refund the certificate fee to the applicant. We will make clear in any job description and advertisement whether this exception applies. Currently, this only applies to the post of Disability and Wellbeing Manager, and Disability and Wellbeing Advisor.

The principles of dignity and respect at the heart of our Equality, Diversity and Inclusion Policy are embraced within our [Dignity and Respect Policy](#) and our [Harassment and Sexual Misconduct Policy](#).¹² [These policies, like the Equality, Diversity and Inclusion Policy, and our Unconscious Bias Guidance Notes are two of the key company documents that all staff are required to read.] Both policies acknowledge a number of basic rights and responsibilities for all members and prospective members of our academic community including a right to be treated with respect and dignity, as well as a right to be treated fairly and without discrimination.

Dignity and respect is a theme revisited in our [Ethics Policy](#).¹³ The latter states very simply that there is a requirement to “treat all people with dignity and respect and ensure that nobody is treated less favourably because of a protected characteristic, or because of their social or economic background, or for any other reason.” In addition, articulated within the policy is a requirement for our academic community to work to “promote and achieve a culture free of discrimination”.

7.2 Support mechanisms

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

For confidential information and advice on support options, staff can book an appointment with a member of staff in the Disability and Wellbeing Office by emailing disability@bil.ac.uk.

¹¹ Members of Complaints Panels, Disciplinary Panels etc will also be required to re-read the Unconscious Bias Guidance Notes in the interest of equitable treatment.

¹² <https://www.bil.ac.uk/qem/policies/>

¹³ <https://www.bil.ac.uk/qem/policies/>

Information on benefits available to those with parental or dependant duties can be found in our Leave Policy (available from HR Online¹⁴).

All staff members have access to the Health Assured Employee Assistance Programme (available free of charge through Perkbox). Health Assured is a confidential employee benefit designed to help staff deal with any personal and work-related issues they might be facing. Information on the scheme can be found in our Staff Benefits document available from HR Online.

7.3 Grading and promotion

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

7.4 Staff development

All staff will have equal access to induction, personal and career development opportunities and facilities. A Staff Induction Checklist is followed for each new appointee to ensure that all staff receive the information they need to support them in their respective roles and career development. In addition, each full-time permanent staff member has an annual allowance of £500 to cover continuing professional development needs. A pro-rata allowance is available for part-time staff. Sessional lecturers also receive an allowance based on the number of their teaching hours. An additional research allowance is payable to research-active staff.

All staff members are required to complete the following online training courses within their first month of employment with Bloomsbury Institute (and every year thereafter):

- Equality and Diversity
- Bullying and Harassment
- Unconscious Bias

In addition, all staff members are required to complete online disability training within one month of joining Bloomsbury Institute.

7.5 Performance management

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

7.6 Discipline and grievance

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

Disciplinary and grievance procedures will be applied fairly and transparently for all staff.

Allegations of discrimination, harassment, sexual misconduct or inappropriate behaviour will be dealt with under the appropriate disciplinary procedures for staff.

¹⁴ HR Online is Bloomsbury Institute's internal Human Resources website, which can be accessed, under a personal username and password, at https://bil.breathehr.com/employees/sign_in.

8. Application of the policy: students

8.1 Recruitment, selection and admission

We welcome applications from people with disabilities and those with long-term medical conditions and specific learning difficulties, and are committed as far as possible to providing them with the support they need to realise their potential and succeed. This commitment is articulated in detail within our [Disability Policy](#)¹⁵.

We will not deny an applicant the opportunity to better their life through education on the grounds that the applicant has a criminal conviction. Consequently, in the interest of social justice and in order not to deter an applicant with a criminal conviction from making an application, we do not require the disclosure of criminal convictions. The decision about whether or not to make an applicant an offer of a place on one of our courses will therefore not be influenced by an applicant's criminal convictions.

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

8.2 Support mechanisms

Staff within our Disability and Wellbeing Office are available to provide students with any reasonable support that they might need. Detailed information on the reasonable adjustments a student could expect us to provide can be found in our [Disability Policy](#)¹⁶ and our [Mental Health and Wellbeing Policy](#)¹⁷. Alternatively, students can book an appointment with a staff member in the Disability and Wellbeing Office by emailing disability@bil.ac.uk. Any requests for support will be treated in strict confidence.

8.3 Assessment

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

8.4 Career planning and engagement

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

8.5 Discipline and student complaints

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

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

Allegations of harassment or discrimination will be dealt with under our [Student Disciplinary Policy and Procedure](#).¹⁸

9. Related regulations, policies and procedures

- Admissions Policy

¹⁵ <https://www.bil.ac.uk/qem/policies/>

¹⁶ <https://www.bil.ac.uk/qem/policies/>

¹⁷ <https://www.bil.ac.uk/qem/policies/>

- Dignity and Respect Policy
- Disability Policy
- Email Acceptable Use Policy
- Ethics Policy
- Harassment and Sexual Misconduct Policy
- Internet Acceptable Use Policy
- Mental Health and Wellbeing Policy
- Prevent Policy
- Staff Disciplinary Procedure
- Staff Grievance Procedures
- Staff Recruitment and Development Policy
- Student Complaints Policy and Procedures
- Student Disciplinary Policy and Procedures
- Unconscious Bias Guidance Notes

10. Review of Equality, Diversity and Inclusion Policy

The Equality, Diversity and Inclusion Policy will be reviewed annually by our Equality, Diversity and Inclusion Committee. Any amendments require the approval of our Board of Directors.

Appendix A: Equality, Diversity and Inclusion Committee

In accordance with **Regulation 15(e)** of the Articles, an Equality, Diversity and Inclusion Committee is established that shall be responsible for, *inter alia*, determining the company's strategic direction in relation to equality, diversity and inclusion, and ensuring this is articulated within the company's Equality, Diversity and Inclusion Policy, and reflected within all other policies and procedures.

Terms of Reference [Delegated by the directors]

Subject to the schedule of matters reserved to the Board of Directors (see **Section 2.2.14** above), the Equality, Diversity and Inclusion Committee is responsible for ensuring compliance with the principles set out within the Committee of University Chairs 'Higher Education Code of Governance' and the Office for Students Regulatory Framework, Notices and Advice, and for:

- Determining the company's strategic direction in relation to equality, diversity and inclusion, and ensuring this is articulated within its Equality, Diversity and Inclusion Policy, and reflected within all other policies and procedures
- Actively promoting, applying, and ensuring compliance with the company's Equality, Diversity and Inclusion Policy, and ensuring the Policy is reviewed annually
- Developing, approving, promoting and overseeing the implementation of:
 - o A programme of awareness raising events for staff and students
 - o A programme of events to celebrate equality, diversity and inclusion
 - o An inclusive teaching and learning environment (through the Inclusive Learning Environment Framework)
- Receiving Monitoring Reports on Implementation of the Strategic Measures (i.e. actions) that are included in our Access and Participation Plan, and other relevant reports as deemed relevant by the Access and Participation Committee [for consideration]
- Receiving Equality, Diversity and Inclusion Reports [for consideration and action]
- Approving an Equality, Diversity and Inclusion Annual Report
- Approving the following policies and related procedures, as well as any new policies and related procedures with a specific equality, diversity and inclusion focus:
 - o Dignity and Respect Policy
 - o Disability Policy
 - o Mental Health and Wellbeing Policy
 - o Student Guide to Mental Health and Wellbeing
 - o Pregnancy, Maternity and Parenting Guide
 - o Unconscious Bias Guidance Notes
- Receiving reports that analyse diversity data to highlight any identifiable inequalities to inform the development and enhancement of our Inclusive Learning Environment Framework and other strategies, policies, procedures and practices, to include reports relating to:
 - o Staff profiles

- Student application profiles
- Enrolled student profiles
- Student performance and achievement data
- Promoting and monitoring the use and effectiveness of the guaranteed interview scheme for persons applying for a post
- Ensuring any new legislation, regulations or best practice is reported internally and addressed at an institution level

The EDIC may refer matters for consideration to the following (in which case the EDIC minutes will be provided):

- Board of Directors
- Strategic Leadership Team (SLT)
- Senior Management Team (SMT)
- Academic Committee (AC)
- Quality Assurance and Enhancement Committee (QAEC)
- Health and Safety Committee (HSC)
- Student Staff Consultative Forum (SSCF)

Membership

- Head of Governance and Company Secretary (Chair)
- EDI Lead and Compliance Officer (Deputy Chair)
- Disability and Wellbeing Manager and Advisor
- Up to two academic members of staff
- Up to two members of staff from Professional Services
- Up to six students, who will volunteer to participate as a member of the Committee because of their interest in equality, diversity and inclusion issues

Any member of the Board of Directors has the right to attend meetings of the committee.

The Quality Department provides secretariat services to the committee.

Quorum

No business other than the appointment of a Chair shall be transacted at any meeting of the Equality, Diversity and Inclusion Committee if the persons attending it do not constitute a quorum. Four members must be present to constitute a quorum.

If such a quorum is not present within fifteen minutes from the time appointed for the meeting, the meeting shall stand adjourned.

Appendix B: EDIC Contact Details

If you would like to raise any issues or concerns you might have regarding equality, diversity and inclusion at Bloomsbury Institute, please feel free to contact one of the following members of the Equality, Diversity and Inclusion Committee (EDIC) in confidence:

Name	Role	Email address
Maria Jackson	Head of Governance and Company Secretary (Chair of the Equality, Diversity and Inclusion Committee)	maria.jackson@bil.ac.uk
Nadia Michail	Disability and Wellbeing Manager	nadia.michail@bil.ac.uk