

# New London Educational Trust



## Equality Policy

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New London Educational Trust believes that all people, irrespective of their race, ethnicity, colour, religion, sex, disability or nationality, should have an equal opportunity. Any kind of breach of the Equality Policy is not acceptable to the Trust.

Examples of unacceptable behaviour are:

Harassment may include unwanted physical contact, pressure to obtain sexual favours by threats or inducements, leering and pestering. Sexually explicit remarks and remarks about physical appearance, suggestive jokes and actions, name calling, gossip and the display of 'pin-up' can be equally offensive and adversely affect working relationships.

Harassment and unjustifiable discrimination because of disability will also constitute a breach of NLET policy and legislation (Equality Act 2010).

Failure to follow this policy will be treated as a serious matter. It may also amount to unlawful discrimination and lead to legal proceedings, in which an individual employee /staff /consultant /contractor/learner accused of discrimination may be named as a party to a case. In some cases an individual may be found personally liable.

The NLET Equality Policy is divided into three sections:

- ✓ **NLET Equal Opportunities Policy**
- ✓ **NLET Race Equality Policy**
- ✓ **NLET Disability Policy**

## Equality Policy

Everyone at New London Educational Trust (NLET) - management, staff, learners and employers with whom we work have a personal responsibility to uphold the NLET Equality Policy by treating all current and prospective learners, job applicants, fellow employees, consultants, customers and visitors fairly and impartially. It sits alongside all other Trust policies and serves to ensure that the Trust meets its legal responsibilities as laid down in current legislation (Equality Act 2010). NLET seeks to achieve inclusion by actively celebrating its inherent diversity as a community and ensuring our differences in identity do not reflect a difference in opportunity.

### Terminology

NLET recognises that equality, diversity and inclusion are not identical, but they are reliant on one other to tackle discrimination. For example, we cannot achieve real inclusion unless we embrace equality and diversity. We often use diversity as umbrella term to describe any of our equality, diversity and inclusion initiatives. However, the following definitions are recognised:

- **Equality:** Ensuring people are not treated less favourably; unjustifiably. Specifically on the basis of one or more protected characteristics<sup>1</sup> defined by the Equality Act 2010 and other anti-discrimination legislations (see Equality Act 2010 factsheets).
- **Diversity:** Recognising and valuing the benefits of different perspectives, backgrounds and experiences. Also, identifying and acknowledging under-representation, and taking active steps to address it through initiatives, policies, and systemic change.
- **Inclusion:** Actively embracing people with diverse perspectives, backgrounds and experiences. And creating an environment that enables us all to feel a sense of belonging, and where we can achieve the extraordinary together.
- **Unlawful discrimination:** When a person or group of people is treated less favourably than another person or group of people would be treated based on their protected characteristic or Each of the above, are grounds covered by current anti-discrimination legislation in the UK.
- **Positive action:** When an employer or organisation takes positive steps to help or encourage certain groups to participate in activity or overcome or minimise disadvantages. This measure stops short of allowing preference to be given to less qualified applicants (e.g. employing or promoting an individual solely because they are from an under-represented group regardless of their suitability for the position); this is considered positive discrimination and is unlawful.
- **Occupational Requirement:** There are times when it is fair and lawful to state a preference for a person of a particular sex or a particular ethnic origin. This is when you can prove that it is essential for the purposes of the job to be of a particular sex or to come from a particular ethnic background. This is referred to as an occupational requirement.
- **Reasonable Adjustments:** Under anti-discrimination legislation (e.g. Equality Act 2010) employers are required to make reasonable adjustments for disabled individuals. This means making changes to a disabled person's environment or the way their work/study is structured to mitigate any disadvantages and allows them to engage productively. This may include, removing physical barriers, providing extra support, and providing flexibility.

### Discrimination

NLET does not tolerate any form of discriminatory behaviours or practices from any member of the NLET community – Trustees, Management, Staff or Students. Disciplinary action may be taken against those individuals who perpetrate discriminatory conduct. NLET policies and procedures are regularly reviewed to ensure that they are non-discriminatory in nature.

### Types of discrimination

- **Direct discrimination** – treating someone unfairly because of their protected characteristic
- **Indirect discrimination** – A practice, policy or rule applied to everyone that may at first appear fair or neutral, but puts people of a particular protected characteristic at a disadvantage
- **Discrimination by association** – a person is treated unfavourably because of another person’s protected characteristic
- **Discrimination by perception** – when someone is treated unfairly because others believe they have a protected characteristic
- **Victimisation** – a person is treated less favourably because they have or is expected to complain about discrimination
- **Harassment** – unwanted conduct that has the purpose or effect of violating a person’s dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.
- **Bullying** – as persistent, offensive, abusive, intimidating or insulting behaviour, abuse of power or unfair sanctions which make the recipient feel upset, threatened, humiliated or vulnerable, which undermines their self-confidence and which may cause them to suffer stress

NLET acknowledges that the terminology associated with aspects of policy can be challenging for many individuals and communities (e.g. ‘race’, BME, BAME etc.). Within the scope of this policy ‘race’ is used to refer to any real or perceived differences that relate to ethnicity, nationality, cultural or linguistic background or heritage or variation in complexion and that ‘disability’ and ‘learning difficulty’ also include a range of neurodiverse and unseen conditions, and as such a persons’ needs may not always be obvious.

NLET advocates for the social model of disability, where disabled people themselves can determine the adjustments they need in order to work and lead independent and autonomous lives. The social model sees the person first and identifies the barriers that can make it impossible or very difficult for disabled people to access jobs, buildings or services. Removing the barriers is the best way to include millions of disabled people in our society.

### **Implementation of the Policy**

It is the policy of New London Educational Trust that:

1. Equality of opportunity will be offered to all members of the Trust community regardless of real or perceived race, gender (male, female and transgender), age, religion (including those with non-atheistic or agnostic beliefs), sexual orientation, disability (To include unseen disabilities and mental health/learning difficulties), family status, political views or ethnic background.
2. Everyone will be treated with respect, trying to give a prompt and efficient service, always adopting a business-like, helpful and courteous manner not showing favour or disfavour to any individual or group of people (in contravention of Equal Opportunities Policy or Legislation).
3. No-one will be denied opportunity by any form of direct or indirect discrimination on grounds of race, gender, age, culture, sexual orientation, disability or background. Using derogatory remarks, even 'in fun' is offensive and sours working relationships. The use of insulting language can take the form of writing graffiti or slogans, making abusive remarks, or circulating offensive material. All are equally offensive and unacceptable.
4. Access to and participation in education will be actively promoted.
5. The curriculum will develop and support the principal of equality of opportunity.
6. Marketing, publicity and public relations will take account of and promote good practice in equal opportunities.
7. The selection, recruitment and promotion of staff will be in accordance with equal opportunities legislation and good practice.
8. Staff development will support and facilitate good practice in equal opportunities.

- 9.** All forms of harassment are unacceptable and will be the subject of disciplinary action.
- 10.** Good practice in equal opportunities will be promoted and disseminated with the community.
- 11.** All aspects of equal opportunities will be monitored, reviewed and evaluated by the Board of Trustees in accordance with the current legislation.
- 12.** Equal opportunities will be co-ordinated across the Trust in all its activities and locations, including work-place based learning such as apprenticeships.

The Equal Opportunities Policy as stated will be implemented in the following way:

- 1.** Equality of opportunity will be offered to all members of the Trusts community regardless of race, gender, age, culture, sexual orientation, disability or background.
  - 1.1.** The Trust will create an environment where all members of the Trust community feel accepted and valued regardless of race, gender, age, culture, sexual orientation, disability or background.
  - 1.2.** The Trust will encourage the participation of all members of the Trust community in all aspects of Trust life.
- 2.** No-one will be denied opportunity by any form of direct or indirect discrimination on grounds of a protected characteristic.
  - 2.1.** Trust practice in terms of equal opportunities will be disseminated, monitored and reviewed.
  - 2.2.** Positive action will be taken to ensure that no unlawful discrimination occurs.
  - 2.3.** In complying with the requirements of the Disability Discrimination Act the Trust will make readily available to all disabled learners a Disability Statement which comprehensively covers information specified by the DFE.
- 3.** Access to and participation in education will be actively promoted.
  - 3.1.** The Trust will actively promote, encourage and facilitate the participation of underrepresented groups.
  - 3.2.** Appropriate advice, guidance and education support will be provided to meet individual need.
  - 3.3.** All areas of the Trust would be made accessible to all members of the Trust community.
  - 3.4.** Open Access and Continuing Education will be promoted.
  - 3.5.** The Trust programme will take into account and reflect the needs of the local community. The Trust will research the needs of the local community.
  - 3.6.** All staff involved in the admission and enrolment of Learners will be trained in good practice in equal opportunities.
- 4.** The Curriculum design, content and delivery will develop and support the principle of equality of opportunity.
  - 4.1.** The curriculum will be designed to develop the potential of all individuals. It will take account of prior learning and experience, and provide opportunity for progression.
  - 4.2.** The Trust will facilitate the integration of Learners with disabilities. It will support Learners with learning difficulties by offering individualised programmes of study.
  - 4.3.** Courses in English as a second language will be developed to meet local needs.
  - 4.4.** All learners will be provided with appropriate support.
  - 4.5.** Resource materials that are used will be monitored to ensure that they are consistent with good equal opportunities practice.
  - 4.6.** The curriculum offered will develop positive attitudes and values in terms of equal opportunities.
  - 4.7.** The curriculum offer will promote an awareness of cultural diversity.
  - 4.8.** The Staff involved in teaching and learning will:

- 4.8.1.** Aim to ensure that there is an appropriate range of programmes that cater for all potential Learners.
  - 4.8.2.** Aim to ensure that programmes are sufficiently flexible to accommodate learners with domestic responsibilities.
  - 4.8.3.** Ensure that course teams audit their materials to ensure balance and appropriateness of content.
  - 4.8.4.** Ensure that assignments do not discriminate.
  - 4.8.5.** Challenge the use of discriminatory language or behaviour by staff and by learners.
  - 4.8.6.** Ensure the availability of appropriate learning materials for all learners.
  - 4.8.7.** Ensure that organisations with which the Trust has collaborative arrangements pursue the notion of equal opportunities.
  - 4.8.8.** Ensure tutorial support is available to all learners.
  - 4.8.9.** Ensure that staff are aware of the need to accommodate Learners with varying abilities within a group and address differentiation through schemes of work, lesson plans.
  - 4.8.10.** Ensure staff fully utilise learning support systems for their learners, where appropriate.
  - 4.8.11.** Through a termly Course Review Process, monitor and report upon:
    - Age, disability, ethnicity and gender recruitment data on all programmes and, where appropriate, devise strategies to address imbalance.
    - Attendance, retention, achievements, withdrawals and destinations in light of background, age, gender, disability or ethnicity and, where appropriate, devise strategies to address imbalances.
    - Number of Learners with disabilities and/or difficulties on local mainstream programmes.
- 5.** Marketing, publicity and public relations will take account of and promote good practice in equal opportunities.
- 5.1.** Trust publicity and marketing materials will be developed to inform and attract all potential learners.
  - 5.2.** Trust publicity and marketing materials will actively promote positive images of all groups in the community.
  - 5.3.** Liaison with local industry, community groups, religious and voluntary organisations, other educational institutions will be created, developed and maintained to encourage participation in education.
  - 5.4.** The Trust commitment to equal opportunities will be included in relevant publicity, marketing and liaison materials.
  - 5.5.** All persons involved in marketing and promoting the services of the Trust, will:
    - 5.5.1.** Ensure that all marketing materials reflect the NLET Equality statement and are made available in public places throughout the community.
    - 5.5.2.** Devise strategies for marketing and targeting under-represented groups to encourage learning.
    - 5.5.3.** Ensure appropriate ethnic minority or community outlets are used to promote the Trust's programmes.
    - 5.5.4.** Ensure reference to the NLET Equality Policy is made in all publicity materials and that publicity materials are in an appropriate language and media.
    - 5.5.5.** Ensure the appropriateness of posters and other visual displays as well as encouraging those that challenge stereotypes and promote positive and non-stereotypical role models.
- 6.** The selection, recruitment and promotion of staff will be in accordance with equal opportunities legislation and good practice.
- 6.1.** Recruitment for all positions within the Trust will be conducted in a manner consistent with good equal opportunities practice.
  - 6.2.** Applicants for posts will be provided with clear and accurate information about posts through advertisements, supplementary materials, job descriptions and interviews.

- 6.3.** Shortlists are drawn up and appointments made according to pre-set, objective criteria, focused solely upon the suitability of the candidate for the post.
  - 6.4.** Recruitment materials will be written and reviewed regularly to ensure that they encourage a broad range of applicants.
  - 6.5.** Application forms will be written and reviewed regularly to ensure that they conform to good equal opportunities practice.
  - 6.6.** Recruitment and selection training will be part of staff development on equal opportunities issues. All staff involved in recruitment and selection will be trained in good practice in equal opportunities.
  - 6.7.** All Trust's policies will be designed to promote equality of employment opportunity to all staff.
  - 6.8.** All staff responsible for the recruitment and induction of Learners will:
    - 6.8.1.** Ensure the Trust's admission systems are free from bias.
    - 6.8.2.** Ensure pre-course guidance is available to all learners to ensure appropriateness of provision.
    - 6.8.3.** Ensure initial assessment procedures fully take into account the various experience and backgrounds of learners.
    - 6.8.4.** Ensure advice is provided to learners potentially eligible for financial help from the Trust.
    - 6.8.5.** Ensure that diversity data is used to review applications and admissions and to identify trends that may become established.
    - 6.8.6.** Ensure that learners undergo an induction process in which they are made aware of the full range of support available, the location of the welfare services, their rights and responsibilities under the NLET Equality Policy.
    - 6.8.7.** Ensure that the learner experience both with NLET and with employers for work-based learning (e.g. apprenticeships) is fully compliant with all aspects of the equality policy.
    - 6.8.8.** Regularly review and report on:-
      - Application by gender, age, disability, ethnicity.
      - Enrolments by gender, age, disability, ethnicity.
- 7.** Staff development will support and facilitate good practice in equal opportunities.
- 7.1.** Staff development will provide training in good practice in equal opportunities.
  - 7.2.** Access to training opportunities and associated publicity materials will be monitored to ensure that this is consistent with NLET Equality Policy.
  - 7.3.** Information and publicity concerning training opportunities will be available to all staff.
  - 7.4.** The NLET Administration Team will:
    - 7.4.1.** Ensure that training opportunities (in particular Equality of Opportunity) are provided for staff so that staff are able to fulfil all requirements of their positions and to recognise learners' differing needs, in order to encourage the highest level of achievement.
    - 7.4.2.** Ensure that the advice given to staff on the choice of training courses and career development opportunities explores all possibilities, based upon the individual's abilities, without regard to traditional stereotypes.
    - 7.4.3.** Ensure adequate staff development programmes are available to provide staff with guidance on handling areas such as multicultural education, harassment, stereotyping etc.
    - 7.4.4.** Evaluate the number of staff undergoing training as well as capturing and evaluating Equal Opportunities data and present an annual report to the Board on attendance by gender, age, disability, and ethnicity.
- 8.** All forms of harassment are unacceptable and will be the subject of disciplinary action
- 8.1.** The Trust will create an ethos where all forms of harassment and their effects are recognised and understood.
  - 8.2.** The Trust will monitor procedures for dealing with harassment of any kind.
  - 8.3.** All members of the Trust community will be informed of these procedures.

- 9.** Good practice in equal opportunities will be promoted and disseminated within the community.
  - 9.1.** Good practice in equal opportunities will be actively promoted with the clients and partners of the Trust.
  - 9.2.** Work experience will be organised, monitored and reviewed in terms of good practice in equal opportunities.
  - 9.3.** In the implementation of work-based learning and work experience the Trust will be proactive in promoting equal opportunities and will promote good practice to employers
  
- 10.** All aspects of equal opportunities will be monitored, reviewed and evaluated in accordance with the NLET Quality Policy.
  - 10.1.** Equal opportunities will be an integral part of the planning, monitoring and review process within the NLET Quality Management process.
  - 10.2.** Equal opportunities policy and practice will be subject to the review process.
  
- 11.** Equal opportunities will be co-ordinated across the Trust in all its activities and locations.
  - 11.1.** A member of the senior Management team will have specific responsibility for co-ordinating equal opportunities as a cross-Trust function.
  - 11.2.** An Equal Opportunities Committee will be established to implement, monitor and develop Equal Opportunities Policy and practice.
  - 11.3.** It is the responsibility of every member of the Trust community to implement the Equal Opportunities Policy as appropriate.
  - 11.4.** NLET recognises that apprentices in particular, will need to be equipped with this support at both NLET sites and at their employers. NLET will work with employers to ensure that apprentices have access to equality of opportunity within their employment contexts.
  - 11.5.** NLET will also work with employers to support entrance of apprentices from under-represented backgrounds successfully engage with apprenticeships at the employers.

### **Primary grounds**

NLET does not have separate policies to cover different areas of diversity. It has a primary but not exclusive focus on the following grounds, an increasing number of which are supported by guidance documents for staff. These are referred to in brief below:

#### **1. Age**

We believe it is positive to have a workforce of different generations and ages and to encourage the contributions of persons of different ages. We also believe there is much to gain from an intergenerational approach within the learning environment, where people are encouraged to learn from those with different life experience. Chronological age should not be used as a criterion, either directly or implicitly, where this is not justified. Our guidance on Menopause in NLET addresses some intersections between age and gender.

#### **2. Disability**

We recognise disability as a broad concept that includes physical, sensory, learning and mental health issues and long-standing and fluctuating health conditions e.g., HIV/AIDS and cancer. We strive for disability inclusion, recognising the skills and expertise many disabled people hold and the richness of experience this brings to our work and to the learning environment. We are committed to addressing unjustified discrimination against and promoting the inclusion of disabled people in our student body and workforce at every level. We aspire to address this by consciously identifying and removing barriers, making reasonable adjustments and promoting the social model of disability alongside the recognition of other empowering and rights-based models and increasing awareness of interacting factors.

#### **3. Gender**

We are committed to tackling gender-based discrimination. Whilst much of the focus is naturally on



equity of opportunity and inclusion for women and girls as an underrepresented group, we also recognise that there are some areas where men and boys are likewise underrepresented. We seek to ensure that our policies and practices recognise and acknowledge these discrepancies, but actively work towards ensuring that no gender identity is disadvantaged by, or underrepresented and excluded from, the work that we do. This also extends to pregnancy - maternity, paternity, adoption and leave for fertility treatment. We further seek to eradicate unjustified discrimination that people are subjected to based on gender reassignment, or perceived gender reassignment, or because they are intersex, or hold a non-binary gender identity which may include being gender fluid. We include preferred pronouns on all email signatures to acknowledge this.

#### **4. Race / Ethnicity and Culture**

Racial discrimination includes less favourable treatment based on nationality, ethnic and national origins, skin colour and other physical markers. It interacts with religion and culture and includes caste identities. We believe that our work is enriched by the different racial / ethnic, cultural communities we engage with and that cultural relations has an important role to play in mutual understanding and positive social development. We know that conflict based on ethnic, cultural and other factors, including stateless people, asylum seeker and refugee status, continues to exist and undermines inclusion. We are committed to ensuring no discrimination on grounds of race / ethnicity or culture takes place at NLET and to promote positive, inclusive and equitable organisational culture. Language can be an important contributor to reinforcing power structures. We should ensure that the language used at NLET, in our materials and on our programmes enable people to feel connected and informed rather than isolated or excluded.

#### **5. Religion and Belief**

We value and respect the different religions / beliefs held by staff and the external contacts and communities in which we operate, including those who hold no religion or belief. We try to ensure that religious / belief needs, and preferences, are met and we support and promote good practice as well as it acting as a helpful reference point when issues emerge. Where existing work requirements conflict with particular cultural and religious needs, we carefully consider whether it is reasonably practical to vary or adapt such requirements to enable them to be met. Requests for the accumulation of annual leave or unpaid leave to undertake pilgrimage; or to take unpaid leave or exchange public holidays for other Holy Days require constructive consideration. Such consideration should pay due attention to the intersection of socioeconomic background. We hold that developing a better understanding of other people's religions and beliefs will contribute to improved cultural relations.

#### **6. Sexual Orientation**

We are committed to supporting people of diverse sexual identities including lesbian, gay, bisexual, questioning, asexual, heterosexual and others to feel included and valued and to tackling discrimination and harassment based on sexual orientation. We believe all members of the NLET community have the right to be themselves without having to be concerned about sharing aspects of who they are. We actively strive to remove homophobia and heterosexism from NLET's policies, procedures and resources.

#### **7. Socio-economic background**

Employment, education, the quality and nature of health care, housing, access to international opportunities and our services, for example, are all significantly determined by socio-economic background. Socio-economic inequality leads to discrimination, marginalisation and reduced opportunities. As part of our commitment to demonstrating the social value of our work, we aim to increase opportunities for people from socially disadvantaged backgrounds, as well as opportunities to participate in our programmes, events, classes and activities wherever possible.