

Equality, Diversity and Inclusion (EDI) Policy 2026-2027

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1. Purpose

The purpose of this EDI policy is to ensure that no individual student or member of staff at the college is disadvantaged by the following factors: race, religion and belief, gender, gender reassignment, sexual orientation, age, additional caring responsibilities, pregnancy and maternity, marriage (including civil partnerships), socio-economic background or disability.

This policy describes:

- The college's vision and commitment to equality, diversity and inclusion (EDI)
- Legal Duties under the requirements of The Equality Act 2010 in employment, facilities, goods and services and admission and treatment of students
- The general equality duty to eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010, advance equality of opportunity between people from different groups; and foster good relations between people from different groups
- Practical steps for implementation of the policy.

2. Scope

Employees and students working or studying at, and visitors to, the college are required to support and uphold the EDI Policy and Procedure, as are employers who work with apprentices and/or provide industry placements to students. Furthermore, the college will only work with partners and key stakeholders that support and uphold the EDI Policy and Procedure.

The college's Board of Corporation - governors - are also required to support and uphold the EDI Policy and Procedure, ensuring that the college remains inclusive in its character and is free from discrimination, harassment and/or victimisation such that all individuals have equal opportunities to work, learn and, ultimately, reach their full potential.

Governors require the college to:

- ensure that relevant EDI policies are in place, up to date and effectively implemented
- promote equality of opportunity and inclusion and celebrate diversity
- not discriminate on the grounds of any protected characteristic, in any aspect of its work
- make reasonable adjustments for disabled people
- listen to student and stakeholder voices and make improvements to support equality of opportunity, diversity and inclusion

3. Responsibility

The college will publish Equality Objectives each year, as required by the specific duties of the Public Sector Equality Duty and will also publish information to demonstrate compliance with the specific duties of the Public Sector Equality Duty. Equality Objectives will be embedded into the college's overarching development plan and progress towards their achievement monitored through the associated, cyclical updates.

Responsibility for the monitoring of staff compliance lies with the Director of Human Resources (HR). The Director of HR will publish information on: recruitment and promotion, pay and remuneration, training, appraisals, disciplinary actions, dismissals and other reasons for leaving.

Responsibility for the monitoring of student compliance lies with the Vice Principal for Quality and MIS.

The Vice Principal for Quality and MIS will also coordinate the authoring (with others) and publication of the college's annual EDI report which will include information regarding:

- Leadership and management of EDI
- Student, staff and governor EDI profiles
- Progress towards EDI Objectives 2024-25
- EDI achievement data
- Other key achievements
- Refreshed EDI Objectives for the next year (2025-26)

EDI is everybody's responsibility. However, operational responsibility for the implementation of the EDI Policy, Procedures and guidelines is led by the Director of Student Support and Inclusion and is implemented by the college's management team. Overall responsibility for the implementation of the EDI Policy lies with the Principal and CEO.

4. Our Vision: EDI Statement

The college is committed to fostering an environment free from all forms of discrimination, actively promoting inclusion, equality of opportunity and celebrating diversity. Under no circumstances will the college condone an act of unlawful discrimination.

The college will ensure that its Equality Objectives are reviewed and refreshed, where necessary, on an annual basis and will engage staff, students and key stakeholders in their development and achievement, such that the college exceeds statutory responsibilities.

5. Procedure

The Equality Act came into force in 2010 covering specific equality strands or protected characteristics: age, disability, gender, gender identity, race, religion or belief, and sexual orientation, pregnancy and maternity, marriage (including civil partnerships).

The single public sector Equality Duty (April 2011) requires public authorities to eliminate discrimination, harassment and victimisation by:

- advancing equality of opportunity.
 - fostering good relationships between people with different characteristics.
- Employment: The college will not discriminate directly or indirectly in recruitment or employment between people with different characteristics specified in the Equality Act 2010.
- Equal Pay: The college has a structured pay system and conducts pay audits following the Equal Pay Code. Any equalities in pay will be tackled through equal pay action plans.
- Reasonable adjustments are provided for staff, students and other college stakeholders who may be experiencing barriers due to disability, including alternative formats for other relevant protected characteristics.
- The recruitment, retention, achievement and progression of students are monitored by protected characteristics to determine trends, gaps in achievement etc. and enable the college to provide focused support where it may be needed.
- The Admissions Policy for the college supports equal access and equality of opportunity for all, providing suitable support for students to access all services and facilities at the college's campuses or online.
- For children and young people whose circumstances have made them vulnerable to underachievement, the college provides support to enhance their participation and improve their achievement.
- All forms of oppressive behaviour / bullying / harassment are challenged by staff and students at all times in accordance with the college's Anti-Bullying Policy and Dignity at Work Policy. Training will be available to staff to support them in this activity.
- Contemplation rooms will be available for multi-faith worship.
- Student induction and tutorial resources been developed to support the college approach to EDI and British Values.
- A range of activities will be used to identify student perceptions of the college environment and the quality of their experience, including; surveys, focus groups, course rep and Student Council meetings.

6. The Quality of Provision

Effective Teaching, Training and Learning

- Admissions processes and initial assessment prior to courses beginning are used to personalise support for students, including those with additional support needs.
- Curriculum intent and implementation reflect and promote EDI in context. Curriculum teams design adaptive learning experiences in order to expose students to different ideas, perspectives and information and provide them

with the opportunity to see a successful future for themselves. Lessons and workshops are personalised to make sure that students see themselves represented in the curriculum and the resources used.

- Support is made available for English for Speakers of Other Languages (ESOL) students who need it to secure their achievement.
- Educational technology and AI are used to help our students to reach their full potential, to give them the chance to engage in a number of different ways and to identify tools that help them understand and be understood.
- Assistive technology is used to give our students improved choice and power over their own learning and to enable them to remove barriers for themselves e.g. what they need to do their best work, where and how to work, how to display, present or share their learning.
- All students who require assistive technology resources can access support appropriate to their needs
- Every opportunity is given throughout each academic year for students to disclose any disabilities such that students feel able and confident to disclose and to see disclosure as the right course of action. The college provides reasonable adjustments in response to such disclosures and will never disadvantage students on the basis of such needs.
- Opportunities to celebrate diversity and to share experiences and knowledge are offered through curriculum enhancement and cross-college enrichment. The college supports student-led development of students' networks e.g. Lesbian Gay Bisexual Transgender Questioning (LGBTQ+) group and the Student Disability Forum and will ensure that best practice from these groups is shared.
- Teachers adjust their teaching strategies, resources, and levels of support to meet the diverse needs of all students in the classroom. This adaptive and responsive teaching approach involves flexibly responding to student needs in real-time to ensure high expectations and inclusive progress for everyone.

7. Student Guidance and Support

- Information, advice and guidance will be delivered such that it is accessible to different groups with protected characteristics and in ways that challenge stereotypes and equip students to defend their rights to fair treatment.
- Support services will meet the needs of students from diverse backgrounds and communities.

8. Consultation and Participation

The college will consult staff, governors, students and other stakeholders through the annual cycle of planning to ensure the its EDI Policy and Procedures reflect best practice, are 'lived' and the college's Equality Objectives are achieved.

9. Training and Development

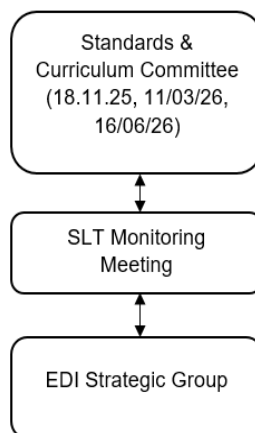
In conjunction with this policy, EDI training is offered to staff, governors and college stakeholders to support the Equality Objectives, raise knowledge of equality legislation, develop EDI competencies and tackle discriminatory practice and behaviour. Attendance at training events will be monitored by the college.

10. Complaints

The college has a number of ways in which staff and students may raise concerns in relation to any breach of this Policy, e.g. the Compliments and Complaints Policy, the Anti-Bullying and Harassment Policy, the Staff Grievance Procedure. The Staff Disciplinary Procedure and the Student Disciplinary and Positive Behaviour Management Procedure will be followed where necessary.

11. Monitoring

The effectiveness of this Policy will be monitored through the college's EDI Strategy group, progress against the college's Equality Objectives and the college's annual EDI Report. Monitoring reports are submitted to the college's Senior Leadership Team (SLT) Monitoring meeting and Board of Corporation meetings.



12. Other Legal Duties

In putting this Policy into practice, the college will work to meet all other duties introduced under the following laws and regulations and is ready to implement future legislation in this area:

- The Equality Act 2010.
- Rehabilitation of Offenders Act 1974
- The Protection from Harassment Act 1997
- Human Rights Act 1998
- Supreme Court judgement on gender identity 2025 (further guidance anticipated, not yet published)

13. Equality Objectives

Equality Objectives for Warrington & Vale Royal College 2025-2027

1. Focus on SEND reforms (published white paper), their impact and aspects to be enshrined in equality objectives.
2. Focus on the destinations of protected groups and students who face other barriers to their learning and/or wellbeing, particularly high needs and 16-18 cohorts.
3. Focus on the achievement of protected groups and students who face other barriers to their learning and/or wellbeing, particularly high needs and 16-18 cohorts.
4. Focus on a better workplace experience for staff with SEND.

Further detail on the Equality Objectives, including the rational and KPIs, can be found in [Appendix A](#)

The EDI Policy and Equality Objectives link closely with the college's Inclusion Strategy and Plan which is available on request.

14. Types of Discrimination

Direct Discrimination

This occurs when someone is treated less favourably than another person because of a protected characteristic.

Associative Discrimination

This is direct discrimination against an individual because they associate with another person who possesses a protected characteristic (for example, a mother of a disabled child).

Perceptive Discrimination

This is direct discrimination against an individual because others think they possess a particular protected characteristic. It applies even if the person does not actually possess that characteristic.

Indirect Discrimination

Indirect discrimination can occur when employers and learning providers have a condition, rule, policy or a practice in the company that applies to everyone but which particularly disadvantages people who share a protected characteristic. Indirect discrimination can be justified if employers and learning providers can show they acted reasonably in managing their business.

Harassment

Harassment is “unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating an individual’s dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual”. Staff and students will now be able to complain about behaviour that they find offensive even if it is not directed at them, and the complainant need not possess the relevant characteristic themselves. Staff and students are also protected from harassment because of perception and association.

Third Party Harassment

The Equality Act makes employers and learning providers potentially liable for harassment of their staff or students by people (third parties) who are not employees of the company, such as customers, subcontractors or guest speakers. Employers and learning providers will only be liable when harassment has occurred on at least two previous occasions and they were aware that it has taken place but did not take reasonable steps to prevent it from happening again.

Victimisation

Victimisation occurs when a member of staff or a student is treated badly because they have made or supported a complaint, or raised a grievance under the Equality Act, or because they are suspected of doing so. A member of staff or student is not protected from victimisation if they have maliciously made or supported an untrue complaint or raised a grievance under the Equality Act; or because they are suspected of doing so. There is no longer a need to compare treatment of a complainant with that of a person who has not made or supported a complaint under the Act.

Discrimination arising from disability

- Treating disabled people unfavourably when using their services for a reason connected with disability.
- Where a provision, criterion or practice puts disabled people at a substantial disadvantage compared with those who are not disabled, to take reasonable steps to avoid that disadvantage.
- Where a physical feature puts disabled people at a substantial disadvantage compared with people who are not disabled to avoid that disadvantage or adopt a reasonable alternative method of providing the service or exercising the function.
- Where not providing an auxiliary aid puts disabled people at a substantial disadvantage compared with people who are not disabled, to provide that auxiliary aid.

Failure to make reasonable adjustments

The duty to make reasonable adjustments comprises three requirements for service providers and those exercising public functions, these requirements are:

- Where a provision, criterion or practice puts disabled people at a substantial disadvantage compared with those who are not disabled, to take reasonable steps to avoid that disadvantage.
- Where a physical feature puts disabled people at a substantial disadvantage compared with people who are not disabled to avoid that disadvantage or adopt a reasonable alternative method of providing the service or exercising the function.
- Where not providing an auxiliary aid puts disabled people at a substantial disadvantage compared with people who are not disabled, to provide that auxiliary aid.

Appendix A – EDI Objectives 2026 - 2028

Equality Objectives 2026-28		
EDI No.	Equality Objective (s) and KPIs	Rationale & KPIs
EO1	<i>Focus on SEND reforms (published white paper), their impact and aspects to be enshrined in equality objectives.</i> • Review process surrounding SEND students in light of Every Child Achieving and Thriving • Continue to develop a diverse offer of transition opportunities to support those with SEND. • Continue to develop a diverse programme of interventions to support those with SEND, including; literacy, numeracy, personal development, welfare and preparation for adulthood. • Continue to ensure teachers and support staff have access to CPD to support development of knowledge and strategies in order to support students with SEN • Continue to ensure that those with SEN attend and achieve in line with their peers	Rationale: Raising the profile and intended impact of the newly published SEND white paper. KPIs: Attendance for students with an EHCP and those with SEND is in line with their peers. Retention for students with an EHCP and those with SEND is in line with their peers. Achievement for students with an EHCP and those with SEND is in line with their peers.

EDI No.	Equality Objective (s) and KPIs	Rationale & KPIs
EO2	<i>Focus on the destinations of protected groups and students who face other barriers to their learning and/or wellbeing, particularly high needs and 16-18 cohorts.</i> • Review curriculum planning to ensure the curriculum is responsive to the needs of disadvantaged learners and the internal progression routes maximise student positive destinations • Review curriculum implementation of work readiness/ work-related skills, particularly at Level 1 and 2, alongside employer partnerships and curriculum design. • Review the extent to which all Curriculum Managers consistently understand and prioritise destination outcomes as equally important as achievement. • Consider how students without a level 2 in English and maths (a disadvantaged group) are supported to increase their progression and destination opportunities. • Review the curriculum plan for tutorial to ensure it is level appropriate and provides strong CEIAG • Consider the wrap around support in relation to next steps and particularly for students that are disadvantaged. • Review and relaunch the enrichment offer, ensuring it includes opportunities for students to extend their preparedness for next steps and adulthood. • Review the At-Risk process to identify and provide early intervention for students at risk of not securing a positive destination.	Rationale: Nationally it is recognised that disadvantaged students do not obtain and retain positive destinations as well as their peers. 2024-25 College data shows that there is a gap of between 4-8% points for students with SEND or those on free college meals. KPI: Destinations for students from a protected group are in line with their peers.



EDI No.	Equality Objective (s) and KPIs	Rationale & KPIs
EO3	<i>Focus on the achievement of protected groups and students who face other barriers to their learning and/or wellbeing, particularly high needs and 16-18 cohorts.</i> • Review curriculum planning to ensure the curriculum is responsive to the needs of disadvantaged learners, including where appropriate a differentiated approach to the curriculum size, length and timetable. • Continue to develop a diverse offer of transition opportunities to support those students from disadvantaged groups into college • Identify timely support needs for students of protected groups and students who face other barriers to their learning and/or wellbeing and review the wrap around support and targeted interventions. • Review and enhance retention strategies; ensure students with early signs of concern are reviewed by Senior Managers to agree swift intervention; be that supportive and/or punitive to confirm the right student is on the right course. • Increase the focus of in year progress and attainment monitoring to enable timely academic intervention for those falling behind. • Ensure the financial support is accessed by all eligible students • Review the At-Risk process to refine and define reasons for at risk of non-achievement. • Further develop staff knowledge and skills of inclusive teaching practice and strategies aligned with the college Teaching and Learning Principles. • Analyse reasons for lower pass rates for students with SEND	Rationale: Nationally it is recognised that disadvantaged students do not achieve as well as their peers. 2024-25 College data shows that there is an achievement gap for students with free college meals (4%) and looked after children (4.5%) due to retention. There is an achievement gap for students with an EHCP (-1.6%), due to lower pass rates. KPI: Achievement for students from a protected group is in line with their peers.

EDI No.	Equality Objective (s) and KPIs	Rationale & KPIs
EO4	<i>Focus on a better workplace experience for staff with SEND.</i> Improve access to workplace adjustments for staff with SEND through: • Increase awareness and confidence across managers through SEN-inclusive management training. • Enhance communication and transparency about support and adjustments for staff with SEND. • Ensure HR policies are accessible to staff with SEND. • Strengthen the organisational culture of disclosure and support for staff with SEND.	Rationale: Increased numbers of staff declaring a disability and accessing suitable workplace adjustments. KPIs: 100% of Leaders & Managers complete SEN-inclusive management training. Year on year improvement of staff perception of leadership understanding and support. 100% of HR policies made available in readable formats, including easy-read and accessible PDF versions. All staff development days (and other training opportunities) to include SEN related sessions.

Equality Impact Assessment

Policy Title:	Equality and Diversity Policy
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Identify the Key Stakeholders:	Staff and students	
What is the impact on the following:	Key Characteristics	Impact
	Age	(1) A positive impact is intended and very likely
	Disability	(1) A positive impact is intended and very likely
	Sex	(1) A positive impact is intended and very likely
	Racial group	(1) A positive impact is intended and very likely
	Religion and belief	(1) A positive impact is intended and very likely
	Sexual orientation	(1) A positive impact is intended and very likely
	Gender re-assignment	(1) A positive impact is intended and very likely
	Pregnancy and maternity	(1) A positive impact is intended and very likely
	Marriage and civil partnership	(1) A positive impact is intended and very likely

	Please tick			
Have any additional safeguarding risks been identified?	Yes	☐	No	☒
Any major changes or adjustments required:	Yes	☐	No	☒
Stop and remove:	Yes	☐	No	☒

**Actions to be addressed:**

Action	To be completed by	Target Date	Completed (Y/N)

Validated by the Equality & Diversity Committee**Date:****If applicable, actions completed and validated by the
Equality & Diversity Committee****Date:**