

## **DN COLLEGES GROUP**

# EQUALITY, DIVERSITY AND INCLUSION POLICY

Effective from: April 2023

## 1. Purpose

- 1.1 This policy should be read in conjunction with the Equality and Human Rights Commission Guidance document “What equality law means for you as an education provider – further and higher education” at: [Equality Act 2010 | Equality and Human Rights Commission \(equalityhumanrights.com\)](https://equalityhumanrights.com)

DN Colleges Group (DNCG) may also have responsibilities under the Equality Act 2010 as employers, bodies that carry out public functions and as service providers. These obligations are not covered in this guidance and you can find out more at [Equality Act 2010 | Equality and Human Rights Commission \(equalityhumanrights.com\)](https://equalityhumanrights.com)

DNCG is fully committed to all aspects of Equality, Diversity and Inclusion (EDI) as they relate to and impact upon all stakeholders. As a Group we recognise that diversity is a positive attribute and force which brings a multitude of benefits. By placing EDI at the heart of our organisation, we will, as a result, embrace and reflect the many aspects of its diverse workforce and learner population. The aim of this policy is to support that intention by providing a framework for continuous improvement and to ensure we work together towards achieving equality for all. However, we will work to ensure that we move beyond compliance to securing excellence in all areas of our work.

DNCG is committed to ensuring that all forms of prejudice and unfair discrimination are unacceptable and challenged. Continuous Professional Development (CPD) and awareness-raising of these standards will be ongoing. Marketing materials, promotional messages and information aim to support equality of access and opportunity to the local communities served by DNCG.

The purpose of the EDI Policy is to demonstrate DNCG’s commitment to The Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017.

The EDI Policy also demonstrates the Group’s commitment to ensuring all learners, staff, volunteers, visitors and other stakeholders are treated fairly and that EDI is valued across the College community.

## 2 Scope

- 2.1 This policy relates to:

- all members of the Governing Body
- **all** staff (*prospective and*
- former learners (*in some limited circumstances*)
- **all** learners (*prospective and current*)
- former learners (*in some circumstances*)
- disabled people who are not learners at the institution but who hold or have applied for qualifications conferred by the institution
- all contractors, partners and third-party providers
- all visitors and volunteers

The governing body carries the ultimate responsibility, under the law for ensuring DNCG meets the requirements of **The Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017**.

In particular, the Chief People Officer will set and maintain the strategic direction of EDI and monitor performance and targets through regular reports.

**2.2** In relation to staff, this policy applies to (but is not limited to) advertising of jobs, safer recruitment and selection, training and development, opportunities for promotion, conditions of service, reward, facilities, health and safety, personal and professional conduct, including conduct on social media, grievance and disciplinary procedures and termination of employment (and beyond where provision of employment references are required). Every member of staff and volunteer is responsible for upholding this policy and the law. Every job role has an EDI component and all staff thus have a responsibility to:

- Apply and integrate the vision and values of the policy in their work and roles
- Support and enable students/apprentices and visitors to abide by the policy
- Take a zero-tolerance approach and considered and immediate action in the event of allegations of bullying, harassment, victimisation and any other forms of discrimination and alert appropriate their director or the Director of Safeguarding, Prevent and Inclusion.

**2.3** In relation to learners this policy applies to (*but is not limited to*) admissions, teaching, learning and assessment, work placements, funding awards under the College's control, learner support, facilities, health and safety, personal conduct, references, complaints and disciplinary procedures. Learners have a responsibility to support our commitment to EDI and comply with this policy by:

- Treating everyone with respect, fairness and understanding
- Abiding by the law
- Using language carefully, without swearing, saying rude, hurtful or disrespectful things about others
- Behaving in a fair and respectful way at all times
- Reporting any concerns they have for themselves or others to staff immediately
- Resolving difficulties and disagreements amicably

**2.4** In relation to contractors, partners and third-party providers this policy applies to work and services provided on behalf of DNCG. Contractors/sub-contractors who are delivering training, or who are undertaking building, maintenance or repair work in any of our buildings/estate are obliged to comply with this policy.

### **3 Responsibilities**

- a) The Corporation designates the Chief Executive Officer as having overall responsibility for EDI
- b) The DNCG Senior Leadership Team and the Director of Safeguarding, Prevent and Inclusion have accountability for overseeing the implementation and promotion of the EDI Policy and for ensuring that an annual report is made to the Corporation and that DNCG publishes information to demonstrate compliance with the duty imposed by The Equality Act at least annually by 30 March and sets equality objectives at least every four years (to be published annually by 30 March) which are specific and measurable
- c) All DNCG staff and volunteers have a duty to implement this strategy
- d) All DNCG staff and volunteers have a contractual obligation to be committed to the EDI Policy and be proactive in its promotion and implementation

- e) All learners, sub-contractors and visitors have a responsibility to comply with those elements of the policy that relate to behaviour and conduct.
- f) DNCG's EDI Group:
- drives the implementation of the EDI Quality Improvement Plan by on-going monitoring of performance and achievement of objectives
  - identifies emerging issues and develops remedial actions
  - considers and implements best practice
- g) The Director of Safeguarding, Prevent and Inclusion is responsible for ensuring the EDI Policy is meeting its commitments by monitoring its implementation.
- h) DNCG's Director of Safeguarding, Prevent and Inclusion in consultation with all other relevant managed areas will produce and present a report(s) to the Board of Governors as summarised below on an annual basis, highlighting areas of improvement and priorities arising for the following academic year to identify:
- Progress against the Equality Objectives as identified in its Annual Inclusion Report, published annually by 30 March.
  - Performance analysis of third-party deliverers, including trainers.
  - Use of inclusive statements and representative images across all aspects of DNCG communication to promote our commitment to advancing equality of opportunity, tackling discrimination, and fostering good relations among all groups of people.
  - Summary of progress to narrow learner equality achievement gaps.
  - Summary of adjustments made for individuals to enable equal access to education resources and services.
  - Summary of complaints/grievances received in year from learners.
  - Staff and learner demographic profiles with comparisons drawn against the local community census data.
  - Gender Pay Gap Reporting.

## 4 Definitions and/or Relevant Legislation

4.1 The Equality Act 2010 consolidates protection against discrimination on the grounds of:

### Age

Where this is referred to, it refers to a person belonging to a particular age or range of ages.

### Disability (This also includes learning disability or difficulty, long-term health condition and neurodiverse conditions)

A person has a disability if they have a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities. Under the Act a claimant does not have to show that their impairment affects a particular capacity such as mobility, speech, hearing or eyesight.

### Gender reassignment (Transitioning)

The process of transitioning from one gender to another. The definition has changed so that people no longer have to be under medical supervision to be protected by the law. Gender Reassignment continues to cover those who intend to live permanently in a gender other than the one assigned at birth.

## **Marriage and civil partnership**

In England and Wales marriage is no longer restricted to a union between a man and a woman but now includes a marriage between a same-sex couple. Same-sex couples can also have their relationships legally recognised as 'civil partnerships'. Civil partners must not be treated less favourably than married couples (except where permitted by The Equality Act).

## **Pregnancy and maternity**

Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

## **Race**

Refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.

## **Religion and belief**

Religion has the meaning usually given to it, but belief includes religious and philosophical beliefs including lack of belief (e.g., Atheism). Generally, a belief should affect your life choices or the way you live for it to be included in the definition.

## **Sex**

The word 'gender' is often used in place of the word 'sex' in equality issues. 'Gender' does not appear in legislation (except for 'gender re-assignment' - see above) but 'sex discrimination' and 'gender discrimination' are generally interchangeable.

## **Sexual orientation**

Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes. Assumptions and perceptions of a person's sexuality are also covered by law.

## **4.2 Compliance with The Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017**

The Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017 replaces previous anti-discrimination legislation with a single act. It aims to simplify the law, remove inconsistencies and make it easier to understand and comply with. It also aims to strengthen the law and to help tackle discrimination and inequality. The majority of The Equality Act came into force on 1 October 2010.

The Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017 Came into force in March 2017 to ensure all public bodies help to make society fairer by tackling discrimination and providing equality of opportunity for all.

- The above legislation requires public bodies to consider all individuals when carrying out their day-to-day work in shaping policy, service delivery and in relation to their own employees. It replaces the 3 previous public sector equality duties for race, disability and gender and covers the following protected characteristics that are recognised within

The Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017, namely:

- Age
- Disability
- Gender Reassignment
- Pregnancy and Maternity
- Race (including ethnic or national origins, colour or nationality)
- Religion or belief (including lack of religion or belief)
- Sex
- Sexual orientation
- Marriage and Civil Partnership

The legislation also applies to marriage and civil partnership, but only in respect of the requirement to have due regard to the need to eliminate discrimination.

Public bodies, when carrying out their activities, to have due regard to the need to:

- Eliminate unlawful discrimination, bullying, harassment, victimisation and other conduct prohibited by the Equality Act (2010)
- Advance equality of opportunity between people from different groups This involves covering the need to:
- Remove or minimise disadvantages experienced by people on account of their protected characteristics
- Meet the needs of people who share the characteristics and people who do not share them
- Encourage people who share the characteristics to participate in DNCG life or in other activities within the College where their participation is low
- Foster good relations among people from different groups. This involves tackling discrimination and promoting understanding across the Group community

#### **4.3 The Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017**

- The Equality Act 2010 also put in place a single public sector equality duty, which gives public authorities a legal responsibility to provide this protection and make decisions which are fair and transparent, including the allocation of public money
- The Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017 enable public bodies to perform the this more effectively. They are obliged to:
- publish information to demonstrate compliance with the duty imposed by Section 149 (1) of The Equality Act at least annually (by 30 March)
- Set equality objectives at least every four years (to be published annually by 30 March) which are specific and measurable

The information a public authority publishes must include, in particular, anonymised information relating to persons who share a relevant protected characteristic who are its employees and other persons affected by its policies and practices.

#### **4.4 Other Relevant Legislation**

DNCG recognises its compliance in respect of the following associated legislation alongside associated codes of practice:

- The Human Rights Act 1998

- The Counter-Terrorism and Border Security Act 2019
- GDPR 2018
- 2014 amendments to the Rehabilitation of Offenders Act 1974
- Freedom of Information Act 2000
- Keeping Children Safe in Education September 2022
- Safer Recruitment
- Prevent Duty 2015 and revised Prevent Guidance 2021

## 5 The Policy

### 5.1 Policy Summary

- a) In order to realise the commitment outlined above every effort will be made to:
- challenge inequality, prejudice and discrimination
  - promote diversity in all its aspects, including employing a workforce and recruiting learners to reflect the community the Group serves
  - treat all people with respect and dignity
  - provide an environment free from prejudice, harassment, discrimination (direct/indirect), discrimination arising from disability and victimisation.
  - where it is reasonable to do so make adjustments to enable equal access to DNCG resources and services ensuring that none are treated less favourably
  - ensure that EDI are integrated into all policies, procedures and charters.
  - ensure that all policies, strategies and procedures have undergone an assessment of the effect on equality (*new documents when written and current documents during review*) to ensure that, where appropriate, they promote equality and do not unlawfully discriminate
  - work in partnership with recognised trade unions to ensure that staff and volunteers are committed to the policy and that it is fully effective.
  - inform all staff, volunteers, students, apprentices and visitors about our commitment to EDI.
  - ensure that the learner experience raises awareness of EDI issues.
  - ensure that staff are working to narrow achievement gaps between different groups of learners
  - ensure EDI are promoted through teaching and learning
  - promote our commitment to EDI through positive statements and representative images in marketing and communications activities
  - ensure that any organisation that delivers services on behalf of DNCG (or works in partnership with DNCG) understands our commitment to EDI and to eliminate discrimination.
  - develop, publish and implement annual reports which set out how we will fulfil our statutory duties regarding promoting equality and tackling discrimination.
  - seek to develop partnerships with external groups and organisations to develop best practice and widen the scope of our diversity activities in the community
  - staff or learners who are in breach of the EDI Policy and/or relevant legislation will be dealt with through formal disciplinary procedures

### 5.2 Measuring Impact

- DNCG is committed to the collection and analysis of data in order to assess performance, identify emerging issues, areas of success and measure the impact of corrective actions.

- The EDI Report and Quality Improvement Plan and any subsequent update will detail how we will implement the EDI Policy.
- Specific targets for improvement will be set, regularly monitored via the EDI Group and an annual report on progress, success and key issues presented to the Board of Governors.

### **5.3 Positive Action**

DNCG will, where appropriate and agreed and for a specific time period, consider positive action measures to alleviate disadvantage experienced by people who share a protected characteristic, reduce their underrepresentation in relation to particular activities or meet their particular needs. DNCG will ensure that when using positive action, it falls within the law.

### **5.4 Integrating Equality, Diversity and Inclusion across DNCG**

DNCG is committed to providing equal opportunities and celebrating diversity in all aspects of its work and to avoiding unlawful discrimination, harassment and victimisation to staff, students and customers. DNCG is committed to advancing equality of opportunity between people from different groups.

Diversity is recognising that individuals and groups of people are different and that it is important to value and celebrate difference.

### **5.5 What is unlawful discrimination?**

Unlawful discrimination is defined in the Act as:

- Direct discrimination (including discrimination based on perception or association).
- Indirect discrimination.
- Discrimination arising from disability.
- Pregnancy and maternity discrimination.
- Failure to make reasonable adjustments (for disabled people).

#### **What else is unlawful under the Equality Act?**

### **5.6 Harassment**

The Equality Act 2010 also prohibits further and higher education institutions from harassing students covered by the education provisions. Harassment is defined as unwanted behaviour related to a protected characteristic, or which is of a sexual nature, that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment.

#### **Victimisation**

The Equality Act 2010 also prohibits further and higher education institutions from victimising students covered by the education provisions.

Harassment is unwanted conduct related to a protected characteristic that has the purpose or effect of violating an employee's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual.

### **5.7 Victimisation**



Victimisation is defined in The Equality Act as:

Treating someone badly because they have done a 'protected act' (or because the College believes that a person has or is going to carry out a protected act).

A 'protected act' is:

- Making a claim or complaint of discrimination (under The Equality Act).
- Helping someone else to make a claim by giving evidence or information.
- Making an allegation that the College or someone else has breached The Equality Act.
- Doing anything else in connection with The Equality Act.

Victimisation is where an individual is subjected to a detriment because they make, or are suspected of making, or supporting a complaint or grievance under the Equality Act 2010. (No protection if a complaint has been maliciously made or supported an untrue complaint).

## **5.8 Direct Discrimination**

Direct discrimination occurs when you treat someone less favourably than you treat (or would treat) someone else because of a protected characteristic.

For example: A further education college rejects an application from a man for a childcare course as they do not think it is appropriate for a man to be working with children. This would be unlawful direct sex discrimination.

## **5.9 Discrimination by association**

Direct discrimination also occurs when you treat someone less favourably because of their association with another person who has a protected characteristic (other than pregnancy and maternity).

This might occur when you treat a someone less favourably because their sibling, parent, carer or friend has a protected characteristic.

## **5.10 Discrimination by perception**

Direct discrimination also occurs when you treat someone less favourably because you mistakenly think that they have a protected characteristic (other than pregnancy and maternity).

## **5.11 Indirect discrimination will occur if the following four conditions are met:**

- You apply (or would apply) the provision, criterion or practice equally to all relevant people, including a particular person who has a protected characteristic and
- The provision, criterion or practice puts or would put people who share a protected characteristic at a particular disadvantage compared to relevant people who do not share that characteristic, and
- The provision, criteria, practice or rule puts or would put the particular person at that disadvantage, and
- You cannot show that the provision, criteria or practice is justified as a 'proportionate means of achieving a legitimate aim'.

Third Party Discrimination protects employees who are harassed by clients, contractors of the employer/provider. An employer is liable if the conduct has occurred on at least two previous

occasions, is aware it had taken place and had not taken reasonable steps to prevent it occurring.

The policy is intended to assist DNCG to put this commitment into practice. Compliance with this policy should also ensure that employees do not commit unlawful acts of discrimination.

DNCG strive to ensure that the work and learning environment is free of harassment and bullying and that everyone is treated with dignity and respect. DNCG has a separate Anti-Harassment and Anti-Bullying Policies which deal with these issues.

DNCG aims to provide a service that meets the needs of all its staff and learners. It anticipates and welcomes its responsibility to plan ahead and to try to meet the needs of all its stakeholders and will consider and make changes to policies and procedures deemed or found to impact negatively.

DNCG will provide additional support and equipment where required and will communicate these intentions in a variety of formats. Staff will be supported through a variety of CPD measures to achieve this objective.

The following key principles will be embedded across DNCG:

### **Age equality**

- The Act defines age by reference to a person's age group and when it refers to people who share the protected characteristic of age, it means they are in the same age group.

Promoted and valued through:

- recognising the benefits of a mixed-age workforce and learner community
- challenging age stereotypes

An age group can:

- mean people of the same age or a range of ages
- be wide such as 'people under 50'
- be narrow such as 'people in their mid-50s' or people born in a particular year
- be relative, such as 'older than me' or 'older than us'
- be linked to actual or assumed physical appearance which may bear little relation to chronological age such as 'the grey workforce'.

A person could therefore belong to various age groups: a 19 year old could, for example, belong to groups that include 'young adults', 'teenagers', 'under 50s', 'under 25s' or '19 year olds'.

### **Disability equality**

A person has a disability (someone who has the protected characteristic of disability) if they have a physical and/or mental impairment which has what the law calls 'a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities'.

There is no need for a person to have a medically diagnosed cause for their impairment; what matters is the effect of the impairment not the cause.

In relation to physical impairment:

- Conditions that affect the body such as arthritis, hearing or sight impairment (unless this is correctable by glasses or contact lenses), diabetes, asthma, epilepsy, conditions such as HIV infection, cancer and multiple sclerosis, as well as loss of limbs or the use of limbs are covered.
- HIV infection, cancer and multiple sclerosis are covered from the point of diagnosis.
- Severe disfigurement (such as scarring) is covered even if it has no physical impact on the person with the disfigurement, provided the long-term requirement is met (see below).
- People who are registered as blind or partially sighted, or who are certified as being blind or partially sighted by a consultant ophthalmologist, are automatically treated as having a disability under the Act.

Neurodiversity includes conditions such as dyslexia and autism as well as learning disabilities such as Down's syndrome and mental health conditions such as depression and schizophrenia.

The other criteria to decide if someone has the protected characteristic of disability are:

- The length the effect of the condition has lasted or will continue: it must be long term. 'Long term' means that an impairment is likely to last for the rest of the person's life or has lasted at least 12 months or where the total period for which it lasts is likely to be at least 12 months. If the person no longer has the condition but it is likely to recur or if the person no longer has the condition, they will be considered to be a disabled person.
- Whether the effect of the impairment is to make it more difficult and/or time-consuming for a person to carry out an activity compared to someone who does not have the impairment, and this causes more than minor or trivial inconvenience. If the activities that are made more difficult are 'normal day-to-day activities' at work or at home.
- Whether the condition has this impact without taking into account the effect of any medication the person is taking or any aids or assistance or adaptations they have, like a wheelchair, walking stick, assistance dog or special software on their computer. The exception to this is the wearing of glasses or contact lenses where it is the effect while the person is wearing the glasses or contact lenses, which is taken into account.

The abilities of people who have disabilities are valued through:

- encouraging staff and learners to disclose a disability, learning difficulty or long-term health condition, or neurodiverse condition
- make reasonable adjustments to support everyone to achieve their full potential
- challenging stereotypes about people who have disabilities

### **Gender reassignment equality (transitioning)**

Gender reassignment is a personal process (rather than a medical process) which involves a person expressing their gender in a way that differs from or is inconsistent with the physical sex they were born with.

This personal process may include undergoing medical procedures or, as is more likely for young people, it may simply include choosing to dress in a different way as part of the personal process of change.

A person will be protected because of gender reassignment in any of the following situations:

- when they make their intention known to someone – it does not matter who this is, whether it is someone at college or university or at home or another professional

- once they have decided to transition they are protected, even if they take no further steps or they decide to stop later on
- as soon as there is evidence of an intention to transition even though they have not reached an irrevocable decision to do so
- when they start or continue to dress, behave or live (full-time or part-time) according to the gender they identify with as a person
- when they undergo treatment related to transitioning, such as surgery or hormone therapy
- when they have received gender recognition under the Gender Recognition Act 2004.

It does not matter which of these applies to a person for them to be protected because of the characteristic of gender reassignment.

This guidance uses the term 'transsexual person' to refer to someone who has the protected characteristic of gender reassignment.

The College will ensure people who plan to start, are undergoing or have transitioned are protected against all forms of discrimination and harassment

### **Pregnancy and maternity equality**

The protected characteristic of pregnancy and maternity applies to a person who:

- is or has been pregnant
- has given birth and is treated unfavourably within a period of 26 weeks beginning with the day on which they gave birth
- is breastfeeding and is treated unfavourably within the period of 26 weeks beginning with the day on which they gave birth.

Outside the 26-week period the learner may be protected by the sex discrimination provisions.

They are protected even when their baby is stillborn so long as they were pregnant for at least 24 weeks before the birth.

### **Race equality**

Race means a person's:

- colour, and/or
- nationality (including citizenship), and/or
- ethnic or national origin

A racial group is composed of people who have or share a colour, nationality or ethnic or national origins.

A person has the protected characteristic of race if they belong to a particular racial group, such as 'British people'.

Racial groups can comprise two or more racial groups such as 'British Asians'.

Racial and cultural diversity is represented at all levels within DNCG through:

- challenging racial and cultural stereotypes

- understanding, valuing and respecting different racial and cultural backgrounds
- integrating equality into
- our education and training programmes

### **Religion or belief equality**

The protected characteristic of religion or belief includes any religion and any religious or philosophical belief. It also includes a lack of any such religion or belief.

A religion need not well known to gain protection as a religion. It must, though, be identifiable and have a clear structure and belief system. Denominations or sects within religions may be considered a religion. Cults and new religious movements may also be considered religions or beliefs.

Belief means any religious or philosophical belief and includes a lack of belief.

'Religious belief' goes beyond beliefs about and adherence to a religion or its central articles of faith and may vary from person to person within the same religion.

A belief which is not a religious belief may be a philosophical belief, such as humanism or atheism.

A belief need not include faith or worship of a god or gods but must affect how a person lives their life or perceives the world.

For a belief to be protected by the Equality Act:

- It must be genuinely held.
- It must be a belief and not an opinion or viewpoint based on information available at the moment.
- It must be a belief as to a weighty and substantial aspect of human life and behaviour.
- It must attain a certain level of cogency, seriousness, cohesion and importance.
- It must be worthy of respect in a democratic society.
- It must be compatible with human dignity and not conflict with the fundamental rights of others.

Learners, staff, volunteers and visitors are treated fairly irrespective of their religious belief and practice or political opinions by:

- respecting a persons' freedom of belief and right to protection from intolerance and persecution.
- providing an environment where everyone can raise issues and debate differences

### **Sex equality (gender)**

Across DNCG, everyone is welcome regardless of their gender identity. We will:

- challenge gender stereotypes
- supporting people in balancing work and home life

## **Sexual orientation equality (sexuality)**

DNCG will promote sexual orientation and gender identity equality and take action to:

- challenge discrimination
- promotion of equality for everyone irrespective of their sexuality
- respecting different gender identities and lifestyles

## **Complaints Procedure**

If a person (e.g., student, former student, member of the public, employee, third party staff or partner) believes they have suffered any form of discrimination, bullying, harassment or victimisation such cases will be taken seriously. All complaints (*including those from whistle blowers*) will be dealt with in accordance with the appropriate procedure.

## **Prevent**

There is no place for extremist views of any kind whether originating from internal sources – learners, staff or governors, or external sources (i.e., online or from specific groups or individuals). It is imperative that our learners, staff and third parties (e.g., visitors and partners) see DNCG as a safe place where they can discuss and explore controversial issues safely and in an unbiased way and where relevant organisational processes encourage and facilitate this.

As a Group we recognise that extremism and exposure to extremist materials and influences can lead to poor outcomes for our students. We also recognise that if we fail to challenge extremist views we are failing to protect our community.

Any prejudice, discrimination or extremist views, including derogatory language, displayed by learners, staff, visitors or partners will always be challenged and where appropriate dealt with using the relevant disciplinary procedure. Where deemed necessary, DNCG will alert any concerns about extremism to partner agencies.

## **British Values**

DNCG will actively embrace, promote and practise the British values of democracy, rule of law, individual liberty and mutual respect and tolerance of those of different faiths and beliefs and those without. These values will be placed at the heart of the culture of DNCG.

The embracing and practice of these values underpins our Prevent Strategy as such acceptance and practice increases the resilience of individuals and helps prevent them from developing extremist views and becoming involved in extremist activity.

## **Anti-Semitism**

The former Secretary of State urged higher education providers to adopt the International Holocaust Remembrance Alliance (IHRA) working definition of antisemitism.

Adoption of the IHRA definition makes a clear, demonstrable commitment to our DNCG community to taking a zero-tolerance approach to antisemitism in all its forms.

Adoption of the definition sends an important message that DNCG will not tolerate instances of antisemitism within our institution, whether that be online or on campus.

On 26 May 2016, the Plenary in Bucharest decided to adopt the following non-legally binding working definition of antisemitism:

“Antisemitism is a certain perception of Jews, which may be expressed as hatred toward Jews. Rhetorical and physical manifestations of antisemitism are directed toward Jewish or non-Jewish individuals and/or their property, towards Jewish community institutions and religious facilities.”

Manifestations of anti-Semitism might include the targeting of the state of Israel, conceived as a Jewish collectively. However, criticism of Israel similar to that levelled against any other country cannot be regarded as antisemitic. Antisemitism frequently charges Jews with conspiring to harm humanity, and it is often used to blame Jews for “why things go wrong.” It is expressed in speech, writing, visual forms and action, and employs sinister stereotypes and negative character traits

Criminal acts are antisemitic when the targets of attacks, whether they are people or property – such as buildings, schools, colleges, universities or places of worship and cemeteries – are selected because they are, or are perceived to be, Jewish or linked to Jews.

Antisemitic discrimination is the denial to Jews of opportunities or services available to others and is illegal in many countries

We are urged to ensure that racism and religious hatred of any kind is not tolerated anywhere, including in our universities and colleges.

## **6 Relevant Policies and Procedures**

This policy should also be used in conjunction with the following policies and procedures:

- Safeguarding, Child Protection and Prevent
- Complaints and Compliments
- Prevention of Bullying, Harassment and Victimisation Policies (for staff, volunteers, subcontractors, students and apprentices)
- Human Resources
- On-line safety
- Social Media
- Data Protection and Freedom-of-information
- Freedom of Speech and External Speakers
- Staff code of conduct
- Whistleblowing
- Health and Safety
- Marketing

## **7 Who to contact with queries**

Sally Senior – Director of Safeguarding, Prevent and Inclusion, [sally.senior@don.ac.uk](mailto:sally.senior@don.ac.uk)  
Rachel Maguire - Chief People Officer, [rachel.maguire@northlindsey.ac.uk](mailto:rachel.maguire@northlindsey.ac.uk)  
Neil Lancaster – Head of HR, [neil.lancaster@northlindsey.ac.uk](mailto:neil.lancaster@northlindsey.ac.uk)

## **8 Communication**

This Policy will be available externally via DNCG websites and referred to in key documentation. It will be promoted to all partners via the intranet, internal communications, induction and ongoing teaching and learning and CPD opportunities.

## **9 Authorisation**

Policy Holder: Rachel Maguire

Approval Committee: Corporation Board

Approval Date:

Next Review Date:

**This Policy will be reviewed annually.**