

LUMINATE FE EQUALITY, DIVERSITY AND INCLUSION POLICY 2023-25

APPROVED BY (Group Board) ON (July 2024)

Applies to:	
Harrogate College	X
Keighley College	X
Leeds City College	X
Leeds Conservatoire	
Leeds Sixth Form College / Pudsey Sixth Form College	X
Luminate Group Services	X
University Centre Leeds	

CHANGE CONTROL

Version:	5.3	
Approval route		
Approval committee (ELT, SELT, Board)	Date approved	Version
SELT	June 2024	5.3
Group Board	July 2024	5.3
Name of author:	Naveed Hussain (with updates by Central EDI Team)	
Name of responsible committee:	Equality, Diversity and Inclusion Committee	
Related policies and guidance:	• Anti-Harassment and Bullying Policy (Dignity at Work) Preventing Bullying and Harassment Policy/Safeguarding Policy • Disability Statement • SEND Policy 2022/23 • Promoting Positive Relationships and Supporting Behaviour Policy • Staff Discipline, Grievance Procedures • EDI Objectives • Anti-Poverty Strategy 2023 • Safer Recruitment & Selection Policy	
Related legislation:	• Equality Act (2010) • SEND Code of Practice • Carer's Leave Act 2024 • Human Rights Act 1998 • Gender Recognition Act 2004 (applicable to over 18s) • Children and Families Act 2014 • Education Act 1996	
Equality impact assessment completed	Date: 20/06/2024	

	Assessment type ☒ Full ☐ Part ☐ Not required	
Environmental Impact Assessment Completed	Date:	
	☐ Yes ☐ No ☒ Not required	
Policy will be communicated via:	• Group Websites • Intranet • Staff and Student Induction and training • Employee Handbook • Contracts and Service Specifications • Staff Equality Forums	
Next review date:	March 2025	

1. POLICY STATEMENT	5
2. POLICY AIMS/OBJECTIVES	5
3. GROUP MISSION AND VALUES	6
4. LEGISLATION AND RELATED POLICIES	6
5. KEY PRINCIPLES	7
5.1 Curriculum, Teaching and Learning	8
5.2 Employment	8
5.3 Supporting Learners and Learner Voice	9
5.4 External Partners and Stakeholders	10
5.5 Visitors, Contractors and Subcontractors	10
5.6 Responsibilities (see Appendix 1 for further details)	10
6. IMPLEMENTATION	11
7. REVIEW	11
8. COMPLAINTS	11
9. APPENDICES	12
9.1 Appendix 1 – Roles and Responsibilities	12
9.2 Appendix 2 – Key Definitions	15

1. POLICY STATEMENT

Luminate Education Group is committed to upholding Equality, Diversity and Inclusion (EDI) across our Further Educational institutions, workplaces and communities within Luminate Education Group.

We aim to provide an inclusive environment where all individuals are treated with dignity and respect, and there is equality of opportunity for students and staff to learn, work and reach their full potential.

Luminate Education Group has a zero-tolerance approach towards any form of discrimination, harassment or victimisation. We will actively challenge inequality and take prompt action against any incidents of discrimination that arise.

This policy upholds principles central to fostering an inclusive environment, including those of democracy, legal requirements, individual freedoms, mutual respect, and tolerance. These guiding principles serve as the cornerstone of our commitment to creating an environment where everyone feels valued, respected and has a sense of belonging. These principles are in line with the British values that Luminate Education Group are committed to upholding.

The leadership team and Board are fully committed to embedding the principles of this Policy across all our activities, decision-making and organisational culture. Advancing equality, diversity and inclusion requires the active participation of the entire Luminate community – our learners, staff, partners and stakeholders.

This policy applies to Leeds City College, Harrogate College and Keighley College, including Leeds Sixth Form College and Pudsey Sixth Form Centre and their stakeholders. The policy also applies to volunteers, external contractors, employers and other partners on all sites and premises, and in any digital presence.

2. POLICY AIMS/OBJECTIVES

The Equality, Diversity and Inclusion Policy sets out the principles on which the Luminate Education Group aims to provide an inclusive and supportive environment, where all individuals are treated with dignity and respect. This promotes equality of opportunity across our Further Education institutions within the Luminate Education Group and celebrates the diversity of our community.

We seek to eliminate all forms of discrimination both in definition according to the Equality Act (2010), and other minority groups that experience systemic challenges, but do not have legally protected characteristics (examples of these include, but are not limited to, individuals from low-socio economic backgrounds, individuals with caring responsibilities and individuals who are experiencing menopause). This is in accordance with Luminate Education Group's [EDI Objectives 2021-2026](#), and our moral commitment to this. We aim to take an intersectional approach that considers the relationships between different protected characteristics, and work to foster positive relations with every member within our community.

Other aims are to comply with equality legislation and meet our public sector duty, to proactively tackle barriers, bias and discrimination, and to empower and support staff and

students to challenge inequality.

We also aim to set equality objectives which must be reviewed frequently, report on our progress annually, and implement initiatives to address any inequalities identified. This Policy's purpose is to uphold Equality, Diversity and Inclusion across our Further Education institutions within Luminate Education Group, workplaces and communities.

3. GROUP MISSION AND VALUES

Luminate Education Group's purpose is to collectively transform lives through inspirational education, training and support.

Restorative practice is at the heart of what we do, promoting challenging conversations and education, when necessary, with the aim of nurturing a culture of mutual respect. This approach enables us to work with our diverse community to ask 'why', with the goal of learning and personal growth from negative situations.

We aim to benchmark all practices against the Equality, Diversity and Inclusion Objectives:

- Celebrate diversity
- Champion disability, neurodiversity and improve accessibility
- Challenge discrimination and foster inclusion
- Invest in the Race Equality Roadmap
- Amplify voice and influence
- Promote social mobility

These objectives will be reviewed every four years, and a strategic action plan will be developed to guide our progress toward meeting these objectives. We will publish an annual equality, diversity and inclusion report on our progress.

4. LEGISLATION AND RELATED POLICIES

The Equality, Diversity and Inclusion Policy is governed by the Equality Act 2010, which makes it unlawful to discriminate against someone because of one or more of the following protected characteristics:

- Age
- Disability
- Sex
- Gender reassignment
- Race
- Religion or belief
- Sexual orientation
- Pregnancy and maternity
- Marriage and civil partnership

The Public Equality Sector Duty stipulates that all public institutions must carry out their

functions while considering the aims specified in the Equality Act of 2010. These aims include the following:

- Eliminating any instances of discrimination, harassment, victimisation, or any other inappropriate conduct.
- Advancing equality and diversity between individuals who possess a relevant protected characteristic and those who do not.
- Nurturing harmonious relations between individuals who possess a relevant protected characteristic and those who do not.

Alongside the Equality Act (2010), this policy is compliant with, and is influenced by, the following pieces of legislation:

- SEND Code of Practice
- Human Rights Act 1998
- Gender Recognition Act 2004 (applicable to over 18s)
- Children and Families Act 2014
- Education Act 1996
- Carer's Leave Act 2024

5. KEY PRINCIPLES

Luminate Education Group expects all members of its community, including staff, students, and visitors, to treat each other with dignity, respect, and courtesy. We support the rights of individuals and groups to hold their own beliefs and values but hold high expectations of the Luminate Education Group community regarding conduct, respect and tolerance.

We fully support the right of individuals and groups to hold their own beliefs and values. Where beliefs and values do differ between individuals and groups, we uphold that no cultural or religious practice may supersede UK law or encroach on the rights and freedoms of others.

Luminate Education Group strives to nurture an inclusive environment that celebrates diversity, challenges prejudice, intolerance and discrimination, and supports positive relationships between diverse groups and individuals. This reflects our commitment to individual freedom, mutual respect, and tolerance. We aim to promote openness, knowledge sharing and dialogue while confronting and challenging prejudice.

Luminate Education Group commits to ensuring fair and equitable treatment and opportunity for all our students, staff, applicants, and visitors. We will not tolerate discrimination, harassment, or victimisation on any grounds, including those covered by the Equality Act 2010.

Luminate Education Group aims to promote its commitment to Equality, Diversity and Inclusion in all internal and external communications, including recruitment materials, handbooks, policies, websites and social media. We will portray the diversity of our educational institutions within Luminate Education Group community positively in publicity materials.

Luminate Education Group will actively consult and engage with staff, students, unions, and partners on Equality, Diversity and Inclusion issues. We will support activities and campaigns that celebrate diversity and promote inclusion.

We will carry out Equality Impact Assessments to determine the implications of policies, processes, events and large-scale change on the individuals and groups within our community and introduce positive action initiatives where inequalities exist.

Luminate Education Group will promote an inclusive culture where staff and students feel confident to disclose disabilities, health conditions, or other needs relating to protected characteristics. We will make reasonable adjustments and ensure individuals are not disadvantaged on these grounds.

Any data on protected characteristics will be gathered and stored appropriately in line with GDPR legislation and policy.

Complaint procedures will be accessible to any staff or students who feel they have experienced or witnessed either, or a combination of, discrimination, harassment and victimisation. All complaints will be promptly and sensitively investigated.

5.1 Curriculum, Teaching and Learning

- Luminate Education Group recognises its responsibility under the Equality Act 2010 to eliminate discrimination, advance equality of opportunity, and foster good relations across all protected characteristics.
- Luminate Education Group aims to ensure equality, diversity, inclusion and belonging will be embedded throughout curriculum design, content, delivery methods, and assessment. This applies to all subjects, levels, and modes of study.
- Teaching staff will be empowered to utilise inclusive pedagogies, resources, and activities that enable equal participation and recognise the diversity of learners' backgrounds and needs.
- The curriculum will ensure it reflects the diversity of the learner community and supports intercultural awareness and understanding. The curriculum will be reviewed periodically to assess opportunities for strengthening diversity and representation.
- All new learners will receive induction information on equality, diversity, inclusion and belonging, including this Policy, their rights and responsibilities, reporting procedures, and our shared values.
- Enrichment activities will further explore diversity, promote intercultural exchange, challenge prejudice, and encourage community cohesion.
- Work-based learners will be empowered through training and resources to recognise and challenge discriminatory practices in their workplace environments.
- Teaching staff will undertake regular EDI training to continuously develop their inclusive teaching competence and foster welcoming, supportive learning environments where all learners can thrive.

5.2 Employment

- Luminate Education Group is committed to building a diverse workforce that reflects and represents the communities it serves.
- Recruitment, selection, and promotion processes will be free from bias. Candidates will be assessed solely on merit, potential, and professional competence. Where data highlights existing or emerging trends, we will actively encourage applicants from under-represented groups as part of our commitment to positive action.
- As part of the dedication to the “Disability Confident” scheme all candidates who declare a disability and who meet the essential criteria will be automatically shortlisted for interview during the application process. Additionally, all candidates who declare a disability will be contacted to establish if there is a need to make reasonable adjustments.
- Reasonable adjustments can be made throughout the employee lifecycle if requested and a disability has been disclosed. This includes recruitment, onboarding, training, performance management, and development activities. This ensures equal access and participation for disabled staff.
- All staff will undertake mandatory EDI training on commencement of their employment and through continuous professional development. This will promote an inclusive culture and equip staff with the skills to embed equality and inclusive practices in their roles.
- Employee data across all protected characteristics will be monitored to identify any underrepresentation. Positive action will be taken to improve representation, participation, and progression.
- Flexible working opportunities will be made available to all staff consistent with business needs and operational requirements.
- Staff Equality networks will be developed to support and empower under-represented groups and enable every employee to thrive.
- Policies, processes and practices will be regularly reviewed to ensure they promote equality, value diversity and remove barriers to inclusion. Stakeholder consultation will be requested during policy reviews and the development of new policies.
- Any form of discrimination, harassment or victimisation will be addressed swiftly and proportionately under relevant conduct policies and procedures, with restorative practice in mind.

5.3 Supporting Learners and Learner Voice

- The learner voice will proactively seek participation from underrepresented groups to ensure diverse representation across all protected characteristics.
- Luminate Education Group recognises that low socioeconomic challenges intersect with other inequalities covered by this Policy. We are committed to tackling barriers created by poverty, lack of social mobility and limited access to opportunity. Our Anti-Poverty Strategy and research on the impacts of austerity provide an evidence base to advance equality, diversity and inclusion across our institutions.

- Targeted academic, financial, and wellbeing support services will be made available to disadvantaged or vulnerable learner groups such as care leavers, young parents, estranged students, those with mental health conditions, etc.
- Reasonable adjustments, assistive technologies, inclusive teaching practices, and robust wellbeing programs will enable all learners to fully participate and succeed in their studies and experience at educational institutions within Luminate Education Group.
- Learner attainment data will be analysed by protected characteristic to identify any outcome disparities. Where disparities are recognised, personalised support programmes will be put in place.
- Learners will have clear reporting procedures and support available if they experience or witness discrimination, bullying, harassment or victimisation.

5.4 External Partners and Stakeholders

- All external partners should have appropriate EDI policies and training in place, in line with legislative duties and good practice. Compliance will be validated through procurement and partner selection processes.
- Contracts and service specifications will reinforce partners' responsibilities to promote equality, value diversity, prevent discrimination and comply with the Equality Act 2010.
- Collaboration with community partners and stakeholders will involve co-creating EDI goals, initiatives and sharing good practice to maximise impact.

5.5 Visitors, Contractors and Subcontractors

- All visitors, contractors and subcontractors should be made aware of Luminate Education Group's EDI Policy and their obligation to comply with it while on campus or undertaking work on behalf of the Group.
- Standard contractor terms and conditions will include EDI compliance clauses. Procurement processes will assess commitment to equality and inclusion.
- Staff liaising with visitors and contractors will be responsible for briefing them on relevant aspects of the EDI Policy and monitoring compliance on site.
- Any incident or breach related to equality, discrimination or unacceptable behaviour by visitors or contractors will be addressed promptly.

5.6 Responsibilities (see Appendix 1 for further details)

- A successful equality and diversity policy requires the active support of the entire Luminate community. Whilst there is a collective responsibility to ensure this Policy is successfully implemented, there are also specific responsibilities as set out in the table in Appendix 1.

6. IMPLEMENTATION

Luminate Education Group will ensure that:

- This Policy is effectively communicated to employees, job applicants, contractors, and all individuals affiliated with Luminate Education Group, including students and prospective students at educational institutions within Luminate Education Group.
- Staff and students receive appropriate EDI training and guidance, both at induction stage but also throughout their employment/enrolment.
- Job descriptions and work objectives for staff members incorporate specific and relevant responsibilities for implementing the Equality, Diversity, and Inclusion Policy.
- Swift action is taken to address any allegations of discrimination, harassment or victimisation through our restorative practice approach and/or complaints procedure.
- External contractors, subcontractors, and agencies are informed of their responsibilities regarding equality and diversity, and a commitment to these principles is expected.

7. REVIEW

The Equality, Diversity and Inclusion Committee will:

- Regularly examine equality data concerning staff and learners on a termly basis and agree on measures to address any identified inequalities.
- Work collaboratively to support the delivery and embedding of Luminate Education Group's EDI objectives.
- Annually publish a two-part report detailing the progress of the EDI objectives and associated actions, and an analysis of key workforce and learner data.
- Conduct an annual review of the equality objectives, setting new objectives every four years.
- Extend support to staff and learner voice initiatives and solicit feedback from entities such as the Students' Union, Trade Unions, staff and learner equality forums, and other engagement mechanisms.
- Review and update the Equality, Diversity and Inclusion Policy to ensure best practice either every 3 years or if there is significant change to national equality legislation.
- Regularly report on equality, diversity and inclusion matters to the Board of Governors, Luminate Education Group leadership teams through regular EDI Committee meetings.

8. COMPLAINTS

Complaints are taken very seriously by Luminate Education Group. Any staff or student found to have acted in breach of the Anti-Harassment and Bullying Policy will be subject to either restorative practice approaches or disciplinary investigation, whichever is most proportionate and appropriate.

Members of staff who have experienced any form of discrimination, harassment or victimisation are encouraged to raise the matter through the appropriate grievance

procedure. A copy of the grievance procedure is available through the staff Policy portal or in hard copy on request from the Human Resources Department.

Students who have experienced any form of discrimination, harassment or victimisation are encouraged to raise the matter through the complaint's procedure. A copy of this procedure is available through the student zone or in hard copy on request from the Quality Team.

Staff who are victims of racist incidents, hate incidents or hate crimes from other staff or students are encouraged to also report the incident to the police, if they wish to do so. Where the incident is from another staff member, it should be reported to their line manager. Where the incident is from a student, it should be reported to the Head of Department of that student. Staff can access wellbeing support through the employer assistance program (EAP) if they have been impacted. Students can access wellbeing support through the relevant Wellbeing Team interventions.

Every effort will be made to ensure that any person making a complaint will not be victimised and will be supported throughout the complaints process. All complaints of discrimination, harassment or victimisation will be dealt with promptly and confidentially in accordance with the Anti-Harassment and Bullying Policy.

Luminate Education Group takes all allegations of discrimination, harassment or victimisation seriously. If on investigation, it is established that discrimination, harassment or victimisation has occurred, disciplinary action will be taken, using restorative approaches to repair harm and support inclusive practice. In extreme cases, this may result in dismissal or exclusion.

9. APPENDICES

9.1 Appendix 1 – Roles and Responsibilities

Role	EDI Responsibilities & Expectations
Board of Governors	• Luminate Education Group is compliant with equality legislation and the codes of practice supporting it. • The Board proactively considers equality, diversity and inclusion as part of their decision-making process. • The Equality, Diversity and Inclusion Policy, Equality, Diversity and Inclusion Objectives and supporting strategic action plans are developed and implemented effectively. • The membership of the Board reflects the diversity of the communities served by Luminate Education Group. • Equality, diversity and inclusion is fully integrated into Luminate Education Group Strategic and Operational Development Plan. • The Board receives termly updates that monitor progress on the Equality, Diversity and Inclusion Objectives. • Attend and participate in regular EDI learning and development.
EDI Committee	• Overseeing the continuing application and development of the Equality, Diversity and Inclusion Policy in line with legislation and Luminate Education Group strategic objectives.

	• Shaping, monitoring and reviewing the Equality Objectives and Action Plan. • Reporting progress on equality issues to the Board of Governors. • Advising on the formulation of policies, procedures and resources.
CEO/Principal and Senior Leadership Team	• Providing leadership and acting as champions and sponsors to promote equality, diversity and inclusion across Luminate Education Group's community. • Actively supporting and empowering employees to integrate and embed equality, diversity and inclusion across the Luminate Education Group. • Communicating the EDI Policy, internally and externally. • Working with the Board of Governors and Senior Managers to ensure that the Policy, Equality Diversity and Inclusion Objectives and related action plans are developed and implemented effectively. • Ensuring that appropriate action is taken against individuals working on behalf of the college who do not act in accordance with the Policy. • Undertake mandatory EDI training. • Ensure direct reports and their teams' mandatory EDI training is up-to-date.
Heads of Departments and Managers	• Ensuring that staff have a clear vision and shared understanding of what Luminate Education Group is aiming to achieve through the Policy. • Implementing the Policy as part of their day-to day management of staff and in applying employment Policies and practices in a fair and equitable way. • Actively supporting and empowering employees to integrate and embed equality, diversity and inclusion across the Luminate Education Group. • Ensuring that equality, diversity and inclusion is built into all quality assurance plans and cycles. • Ensuring equality, diversity and inclusion is a key area of accountability in performance reviews, self-assessment reports and quality improvement plans. • Ensuring all staff act in accordance with the Policy providing support and direction where necessary. • Effectively managing and dealing promptly when investigating issues relating to potential discrimination, bullying or harassment. • Ensuring that all policies, processes and decisions that will positively or negatively impact provisions, practices or policies and affect the workforce or learners are subject to an Equality Impact Assessment. • Taking the lead in creating a positive, inclusive ethos that challenges inappropriate language and behaviour and celebrates diversity. • Undertake mandatory EDI training. • Ensure direct reports and their teams' mandatory EDI training is up-to-date.

Programme Managers and Curriculum Leaders	- Equality, Diversity and Inclusion is promoted in all learner settings and these principles are actively embedded into all curriculum areas. - Student performance and EDI data (including retention and success rates) are monitored on a termly basis and actions set to address any identified gaps. - Student performance and EDI data is recorded in the Self-Assessment Reviews (SARs) and actions are set to narrow any performance gaps for protected groups. - Student induction programmes and tutorials develop students' understanding of equality, diversity and inclusion. - Undertake mandatory EDI training. - Ensure direct reports and their teams' mandatory EDI training is up-to-date.
Human Resources	- Developing employment policies and strategies embedding equality, diversity and inclusion. - Providing guidance to line managers and staff and supporting managers in mediating or investigating issues relating to equality, diversity and inclusion. - Monitoring and reporting on the workforce equality data to the Equality, Diversity and Inclusion Committee. - Championing and sponsoring equality, diversity and inclusion, internally and externally. - Facilitating learning and development initiatives in relation to Equality, Diversity and Inclusion. - Undertake mandatory EDI training. - Ensure direct reports and their teams' mandatory EDI training is up-to-date.
External Stakeholders	All partners, contractors, and service providers engaging with Luminate Education Group must adhere to the Equality, Diversity, and Inclusion (EDI) Policy guidelines stipulated within agreements or contracts.
All Luminate Education Group Staff	- Have read and understood the Policy. - Implement the Policy in their day-to-day work and model behaviour that reflects the expectations outlined. - Treat people with respect and dignity in all their interactions. - Notify their line manager of any concerns regarding the conduct of other employees, learners, visitors or third parties. - Help to build an inclusive culture where diversity is valued, and people feel confident to bring their authentic selves into the working and learning environment. - Challenge inappropriate and discriminatory language and behaviour by staff, students, placement providers and other users of our services, using a restorative approach where appropriate. - Report any racist incidents, hate incidents or hate crimes experienced from staff to their line manager in the first instance. - Report any racist incidents, hate incidents or hate crimes experienced from students to the Head of Department in the first instance. - Undertake mandatory EDI training.

	Where relevant, ensure direct reports and their teams' mandatory EDI training is up-to-date.
All Luminate Education Group Students	- Adhere to the Student Promoting Positive Relationships and Supporting Behaviour Policy and treat all members of the College community with dignity and respect. - Create and maintain a learning and social environment free from bullying, harassment and discrimination. - Help to build an inclusive culture where diversity is valued, and people feel confident to bring their authentic selves into the working and learning environment. - Challenge inappropriate and discriminatory language and behaviour by staff, students, placement providers and other users of our services, using a restorative approach where appropriate. - Support and promote the Equality, Diversity and Inclusion Policy and procedures. - Treat people with respect and dignity in all their interactions.

9.2 Appendix 2 – Key Definitions

Term	Definition
Hate Crime	A Hate Crime is any criminal offence that is motivated by hostility and prejudice towards a person's identity or perceived identity.
Reasonable Adjustments	The access arrangements an employer or education institution makes to remove or reduce a disadvantage related to someone's disability.
Harassment	Harassment is behaviour that makes someone feel intimidated or offended. Harassment is unlawful under the Equality Act 2010.
Discrimination	Treating an individual less favourable, either directly or indirectly, due to having, or being perceived as having, a protected characteristic.
Victimisation	Negative treatment as a result of being involved with a discrimination or harassment complaint.
Positive Action	A range of measures allowed under the Equality Act 2010 which can be lawfully taken to encourage and train people from under-represented groups to help them overcome disadvantages in competing with other applicants.

