

# Equality and Diversity Policies and Procedures

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## Foreword

Ravensbourne University London is committed to equality of opportunity for all staff and students. The university wishes to foster a proactive and inclusive approach to all aspects of equality, supporting and encouraging under-represented groups, promoting a culture of inclusivity, and valuing diversity.

The equality and diversity policy, underpinned by its supporting policies, have a major impact on all aspects of the life of the university and are a demonstration of its commitment to meeting these responsibilities in full.

We recognise that we need such policies within which the university's intention is clearly stated. The framework is explicit in defining how the university intends to implement the policies and emphasises the responsibility of all staff to ensure that both the letter and spirit are integrated into the daily life of the university.

We look to all staff and students to understand and interpret how these policies affect their own role and how they will contribute to their success.

Andy Cook  
Vice Chancellor

# Equality and Diversity Policy – Overview

## 1 Introduction and Context

- 1.1** Ravensbourne aims to, “provide high quality, specialist education in design and communication, meeting the needs of the regional, national and international communities that it serves.” Ravensbourne recognises and accepts that it has a legal and moral obligation for the prevention and elimination of discrimination in any form.
- 1.2** The management, staff and students of Ravensbourne are committed to developing a community which continually strives to achieve equality of opportunity. Ravensbourne aims to promote good relations among its staff and students and to create a learning environment within which all members of the community can fully realise their individual potential.
- 1.3** Ravensbourne wishes to ensure that all staff and students work in a climate free from unfair treatment, harassment or abusive behaviour. Ravensbourne recognises that discrimination can manifest itself in different ways and that its effect is destructive both to those who experience it and to those who cause it.
- 1.4** Ravensbourne acknowledges and accepts its legal responsibility to protect and enhance the rights of students and staff in the promotion of equality of opportunity. It will take positive steps to raise awareness about equality of opportunity on its courses and amongst employees by providing training and through the dissemination of information. In its policies and decisions Ravensbourne seeks to ensure that it covers all the protected characteristics in the Equality Act 2010 and that no-one is unlawfully discriminated against on the basis of gender, sexual orientation, marital or civil partner status, gender reassignment, race, religion or belief, colour, nationality, ethnic or national origin, disability or age, pregnancy or maternity or on the basis of trade union membership or the fact that they are a part-time worker or a fixed-term employee.
- 1.5** Ravensbourne’s staff and applicants for employment shall not be disadvantaged by any policies or conditions of service which cannot be justified as necessary for operational purposes. Ravensbourne will continue to strive to work within legislative requirements as well as promoting best practice.

- 1.6** This policy has been reviewed in line with the Equality Act, which was introduced in October 2010. This covers all protected characteristics under the one Act. This policy is therefore presented as a single document, and includes separate policies on each of the strands.

## **2 Scope**

- 2.1** Ravensbourne will continue to strive to ensure that equality of opportunity is embedded in the delivery of all educational activities and related services. Ravensbourne will also continue to ensure that all Human Resources policies and practices adhere to the principles of equality of opportunity.
- 2.2** Ravensbourne aims to ensure that those students with the potential to benefit from higher and further education have the opportunity to do so, whatever their background. This means providing for the needs of a growing group of independent learners with a broad variety of life and educational experiences. We understand that students may return to study within an educational environment on more than one occasion across their lifetime in order to refresh their knowledge, upgrade their skills and sustain their employability and that Ravensbourne needs to be able to respond to the changing needs of these learners.
- 2.3** Ravensbourne will continue its programme of outreach work to raise awareness of what it can offer and to develop bespoke routes of access in partnership with schools, further education colleges and voluntary-sector organisations. This programme will continue to focus on increasing representation among students from families who would not previously have considered Higher Education, those from minority ethnic backgrounds, part time learners and those with disabilities. We will work in close co-operation with partners in the creative industries to demonstrate the vocational outcomes of higher and further education and to assist industry partners in meeting their own objectives of inclusivity and diversity.

## **3 Diversity**

- 3.1** Ravensbourne will encourage all staff and students to recognise, value and reflect positively the contributions of individuals of different social backgrounds, cultures, religions, abilities, and ages. Through training they will be encouraged to see diversity as a strength and something that adds value to Ravensbourne. Staff and students must be made to

feel that their culture is respected within the Institution. Our core statements about diversity are that Ravensbourne will:

- 3.1.1** Continue to raise levels of participation on courses achieving a community that reflects its core commitment to diversity. To do this Ravensbourne will actively encourage participation by under achieving minority groups
- 3.1.2** Seek to make a significant contribution to the diversity of practitioners within the Creative Sectors through increasing the diversity of its learners
- 3.1.3** Seek to equalise access where gender, age or other factors are currently limiting opportunity
- 3.1.4** Work towards supporting flexible working for those with particular needs or circumstances where this is appropriate
- 3.1.5** Seek to raise the achievement of learners who currently underachieve
- 3.1.6** Strive to make the learning experience more inclusive, eliminate unlawful discrimination and promote equality of opportunity for all learners and staff
- 3.1.7** Endeavour to work with external agencies to provide smooth progression routes onto Ravensbourne courses for students who might not normally apply
- 3.1.8** Aim to reflect the communities that it serves in terms of our composition of students and staff
- 3.1.9** Aim to enhance competitiveness by attracting competent members of staff who understand the needs of their clients and respect and value diversity
- 3.1.10** Aim to increase Ravensbourne's market share by attracting a more diverse range of students.
- 3.2** Ravensbourne accepts that its workforce and student population consist of a diverse population of people. Ravensbourne will make every effort to harness these differences, thus creating an environment in which all staff and students feel valued, where their talents are fully utilised, and in which organisational goals are met.

## **4 Responsibilities**

- 4.1** All members of Ravensbourne staff, students and contractors, will be responsible for their actions. It is the duty of all members of staff and every student to avoid discriminatory practices and to actively discourage others who may engage in discriminatory activities.
- 4.2** The following have specific duties and responsibilities:
- 4.2.1** The Vice chancellor has overall responsibility for equal opportunities. The vice chancellor is accountable to the Board of Governors, who are ultimately responsible for ensuring that Ravensbourne complies with its obligations under the relevant legislation
- 4.2.2** All Managers are responsible for the day-to-day implementation of this policy and its delivery (as per the Action Plan) in their area of responsibility
- 4.2.3** The vice chancellor of Human Resources is responsible for all aspects of equal opportunities in employment and staff development matters. This includes all staff related monitoring for ensuring the effectiveness of this policy. This information is then presented in the form of an annual report
- 4.2.4** The university secretary and chief compliance officer has senior management responsibility for progressing the equality agenda in relation to student related matters. The director of HR & OD has senior management responsibility for progressing the equality agenda for all staff related issues. This will include dissemination of information, co-ordination and as appropriate preparation and presentation of student-related reports.
- 4.2.5** All managers are responsible for taking action to ensure that this policy is implemented in the operation and delivery of all academic programmes and related services.
- 4.2.6** Equality Impact Assessments will be conducted as necessary by the Department Heads to determine whether the policy has a differential impact on a particular group. Whilst impact assessments are no longer a legal requirement under the Equality Act 2010, they will still be undertaken for all equality areas as good practice.

- 4.2.7** All staff and students are responsible for ensuring that at no time do any of their actions or omissions constitute an act of unlawful discrimination, harassment or victimisation. Individuals may be held personally accountable via Ravensbourne's Grievance and Disciplinary Policies and Procedures.
- 4.2.8** Contractors, Visitors, Clients and Suppliers of Goods and Services as well as people not employed directly by Ravensbourne, who play a part in the delivery of Ravensbourne services, are required to operate within the scope of this policy or to evidence their commitment to equality of opportunity through their own equal opportunities policy. Business Incubatees are also required to demonstrate their commitment to equality of opportunities and operate within the scope of this policy.

## **5 Implementation**

### **5.1 Student Enrolment, Selection and Progression**

- 5.1.1** Ravensbourne welcomes applicants with particular learning and support needs and will seek to ensure that all individuals have equal opportunity to fulfil their potential. Ravensbourne will continue to improve access to its facilities and to make speedy responses to identified needs.

Ravensbourne invites all potential applicants to discuss the details of their requirements with staff and will endeavour to make all reasonable efforts to enable the applicant to benefit from and succeed within Ravensbourne.

It is Ravensbourne's policy to make decisions regarding student recruitment and selection wholly on the basis of the individual's potential to benefit from and succeed within Ravensbourne's mission to deliver high quality, specialist education. Judgements about student achievement and progression are made on the basis of objective information and through fair and transparent procedures.

### **5.2 Student Admissions**

- 5.2.1** Whilst pursuing Ravensbourne's mission as a centre of high quality specialist education, it is important that all applications are dealt with efficiently and fairly. In the admission of students, Ravensbourne is committed to ensuring that:

**5.2.1.1** No one receives less favourable treatment on grounds of gender, sexual orientation, marital or civil partner status, gender reassignment, race, religion or belief, colour, nationality, ethnic or national origin, disability or age, pregnancy or maternity or socio-economic background;

**5.2.1.2** Applications from people with disabilities, learning difficulties and particular learning needs are welcomed;

**5.2.1.3** Selection criteria and procedures are kept under review so as to ensure that individuals are selected and treated solely on the basis of their relevant merits and abilities.

**5.2.1.4** The university secretary and chief compliance officer will monitor application and enrolment statistics on these matters to ensure that Ravensbourne's equal opportunities commitments are being met.

### **5.3** Curriculum and Course Monitoring.

**5.3.1** The Learning, Teaching and Student Experience Committee is the body responsible for taking into account issues of diversity, inclusivity and equal opportunities in the design and delivery of the curriculum and in teaching, learning and assessment methodologies.

**5.3.2** Course teams are responsible for implementing the equal opportunities policy on a day-to-day basis.

**5.3.3** Boards of Studies and the Curriculum and Programmes Board are responsible for monitoring equal opportunities through termly meetings and the Annual Course Monitoring (ACM) process, reflecting on student feedback.

**5.3.4** ACM will include analysis of statistical information in relation to the characteristics of applicants and selection and enrolment of students.

**5.3.5** Students are encouraged to make comments on equality of opportunity as part of this process.

**5.3.6** Course Leaders will address any identified areas of individual learning needs in liaison with the Student Services department. Staff development sessions will be planned in response to any recurring areas of identified learning needs. These will be discussed at the Learning, Teaching and Student Experience Committee.

- 5.3.7** Any general issues from this monitoring will be highlighted in annual monitoring report(s) to the Academic Board.
- 5.4** Counselling, Advice and Guidance for Students.
- 5.4.1** In organising and resourcing its support services, Ravensbourne is committed to providing a professional, fully confidential counselling service to all students. It will make every effort to meet the needs of students who may have particular difficulties related to their work or other aspects of their lives in Ravensbourne.
- 5.4.2** Ravensbourne will provide counselling, health, financial and housing advice to students on an individual basis, and a system of tutorial advice, guidance and support at course level.
- 5.4.3** Ravensbourne is committed to supporting the spiritual and worship needs of all members of Ravensbourne where a room is provided for any religious group that wishes to meet or for any individual who needs private space to worship.
- 5.5** Staff Recruitment and on-going Professional Development
- 5.5.1** The recruitment and appointment of staff is made on the basis of relevant ability and potential. All staff have equal access to training and professional development support and activities. Positive efforts are made to raise awareness among staff of equal opportunities issues that affect their role and to be responsive to the needs of staff and of the Institution. A positive approach will be adopted by all staff and students involved in the process of recruitment, to ensure that unlawful discrimination which might deter potential staff and students does not occur.
- 5.5.2** The director of human resources and organisational development will be responsible for monitoring equal opportunities in employment generally and prepare make an annual report.
- 5.5.3** Ravensbourne is committed to staff development opportunities, training and education for staff to raise awareness about equality of opportunity policies and practices.
- 5.5.4** The director of human resources and organisaitonal development and the university secretary and chief compliance officer will be

responsible overseeing the implementation, monitoring of legal requirements and for disseminating information.

- 5.5.5** The induction package for new members of staff will include an introduction to Ravensbourne's Equality and Diversity Policy.
- 5.5.6** Ravensbourne is committed to equal opportunities in staff development and wishes to ensure that all its staff are provided with the provision of appropriate opportunities to keep abreast of developments affecting the way they work. All staff will have equal access to funds for staff development through agreed disbursement procedures devised by the director of human resources and organisational development.
- 5.5.7** Line managers' are required to ensure through the Annual Performance Review and Development (APRD) process that their staff are offered appropriate training and development opportunities in accordance with Ravensbourne's Staff Development Policy. This includes in-house and external training and professional development.

## **6 Monitoring and Evaluation**

- 6.1** Ravensbourne is committed to monitoring and evaluation through carrying out impact assessments in order to provide essential statistical information in relation to the effectiveness of its policies in practice.
- 6.2** People making applications to Ravensbourne for employment will be requested to indicate their equalities information as perceived by themselves.
- 6.3** As part of the registration process, students will be requested to indicate their equalities information as perceived by themselves.
- 6.4** In keeping with best practice, Ravensbourne will monitor, by racial group:
- Student admission and progress; and
  - Staff recruitment and career progress.
- 6.5** Ravensbourne will monitor all aspects which relate to equality of opportunity including age, disability, gender, marital status, racial group, religious belief and sexual orientation using Ravensbourne impact assessment policy and process. Statistical monitoring will form

part of Course reviews, Registry reporting and Human Resource reporting.

**6.6** Reporting figures are monitored so as to test:

**6.6.1** Levels of participation in Ravensbourne – under or over representation of people from a particular racial group and consequent impact;

**6.6.2** Levels of quality – whether or not all community groups receive an equally good service;

**6.6.3** Levels of relevance – whether the policies, initiatives and services provided by Ravensbourne address the real needs of specific community groups;

**6.6.4** That the numbers, types and outcomes of complaints of race discrimination and/or racial harassment made by members of staff and students in different parts of Ravensbourne are monitored; and

**6.6.5** Levels of appropriateness – whether the policies, initiatives or services provided by Ravensbourne are delivered and received in a way that is culturally sensitive and respectful. Where, as the result of the monitoring process, it is demonstrated that policies and procedures give rise to an adverse impact or a differential impact on members of minority racial groups.

**6.6.6** Once established, monitoring will continue to be conducted and kept under review (please see Equality Action Plan for more detail on monitoring for race equality).

## **7 Legal Authority**

**7.1** Ravensbourne has a legal responsibility for ensuring compliance of all of the appropriate sections of the following Acts, Regulations and Reports:

- Disability Discrimination Act 2005
- Public Order Act, 1986
- Rehabilitation of Offenders Act, 1974
- Data Protection Act, 1998
- The Human Rights Act, 1998
- Equality Act 2006
- The MacPherson Report (The Stephen Lawrence Inquiry) 1999
- Equality Act 2010

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## **8 Responding to Feedback / Complaints**

- 8.1** Ravensbourne will respond positively to constructive criticism and to any complaint that relates to harassment, discrimination and equality of opportunity.
- 8.2** Ravensbourne will seek to provide a supportive environment for those who wish to make complaints of harassment and discrimination.
- 8.3** Ravensbourne has a Complaints procedure for students and a Grievance procedure for staff that apply to those complaints that occur in relation to this policy and that cannot be resolved informally.

## **9 Race Equality Policy**

- 9.1** Ravensbourne is committed to promoting race equality and tackling race discrimination. This policy is a fundamental part of that commitment. Through its implementation Ravensbourne aims to ensure that the promotion of good race relations and the elimination of race discrimination continues to remain central to its activities and permeates its ethos. This policy forms part of Ravensbourne's overall Equality and Diversity Policy that seeks to provide a holistic approach to achieving equality of opportunity for staff and students.
- 9.2** The Equality Act replaces and consolidates all existing equality legislation including the Race Relations Act 1976 (as amended by the Race Relations (Amendment) Act 2000), which sought to eliminate discrimination on the grounds of race. The Equality Act continues to protect people against discrimination on the grounds of their race, which includes colour, nationality, ethnic or national origin.

## **10 Scope**

- 10.1** There is no formal requirement in the Equality Act for an employer to put in place an equality policy, however a systematic approach to developing and maintaining good practice is the best way of showing an organisation is taking its legal responsibilities seriously. Ravensbourne will therefore have in place arrangements to:
- 10.1.1** Assess the impact of its policies on students and staff of different racial groups;
  - 10.1.2** Monitor, by reference to those racial groups, the admission and progress of students and the recruitment and career progress of staff; and
  - 10.1.3** Publish its race equality policy and the results of its assessment and monitoring.
- 10.2** These duties will support Ravensbourne in ensuring it complies with best practice. Throughout this policy and procedure reference to a racial group conforms to the definition contained in the Equality Act 2010 i.e. a group of people defined by colour, ethnicity, race, nationality, national or ethnic origins.

- 10.3** This document aims to fulfil Ravensbourne’s duty in relation to the publication of a policy. Ravensbourne recognises that the publication of a policy alone is not enough to ensure it meets best practice standards and that it has an obligation to continue to ensure that the policy is translated into practice and everyday life at Ravensbourne. In order to enable the policy to continue to remain common institutional practice, Ravensbourne will continue, through training, to raise the awareness of every student, member of staff and service provider of the value of cultural diversity. Ravensbourne will also ensure that all complaints of race discrimination are dealt with swiftly and effectively. The policy is linked with the other strands of equality policy to ensure that race equality is appropriately mainstreamed.
- 10.4** Mainstreaming race equality into the ethos and everyday life of Ravensbourne will include a periodic evaluation of all of Ravensbourne’s functions with the aim of identifying those which have race equality relevance. The implementation of policies and procedures compliant with the best practice and statutory requirements. Distribution of the policy to all staff and students and appropriate service providers, implementing staff awareness and training programmes. Investigation of any complaint of racial discrimination using the disciplinary / complaints procedure as appropriate and the integration of race equality issues and actions into an annual monitoring and review process.
- 10.5** Ravensbourne also recognises that as a matter of best practice an impact assessment must be undertaken on this policy. The policy and impact assessment will be reviewed as necessary by the HR Officer in order to assess and evaluate progress against the stated equality targets in the Equality Action Plan.

## **11 Background**

- 11.1** Ravensbourne relocated to the Greenwich Peninsula in September 2010, which forms part of the Royal London Borough of Greenwich. The demographic profile of the Royal London Borough of Greenwich varies considerably from that of Bromley, where the Institution was previously based. Greenwich has one of the largest minority populations in the southeast – a factor that currently informs the context for Ravensbourne’s recruitment strategy.
- 11.2** Greenwich is a racially diverse borough; 52.3% of the population are white and other ethnic groups (BME) make up 47.7% of the population (2011 Census).

- 11.3** Ravensbourne is a small university-sector Institution, primarily engaged in the delivery of professionally oriented honours degree, sub-degree and taught postgraduate programmes in Design, Media and Communication. The Institution in 2015-16 had a total of 2,570 students, offering 51 courses across Further and Higher Education. The Institution attracts students from a varied range of cultures and backgrounds and includes representation from 95 countries. For 2015-16, the Institution's overseas students made up 4% (97) of the total student population. Students from other European Union Countries made up 4% (100) of the full-time student body.
- 11.4** As at 31<sup>st</sup> August 2016, Ravensbourne employed a total of 216 staff comprising 94 academic staff and 122 support roles. A further 185 hourly-paid lecturers were also engaged across 2015-16. The ethnic origin of staff shows that black and other ethnic groups comprise 23% of staff. In this respect, Ravensbourne's ethnic profile is below the ethnic groups of people who reside in Greenwich, however this is an increase of 7% from 2014-15, showing that the Institution is starting to reflect the local equality profile.

## **12 Responsibilities**

- 12.1** The Board of Governors is ultimately responsible for ensuring that Ravensbourne complies with its obligations under the relevant legislation and with the commitments set out in this policy. The university secretary and chief compliance officer will prepare a report on the implementation, progress and achievements (by reference to identified targets).
- 12.2** The vice chancellor may delegate their responsibilities under this policy to another manager, of sufficient status to decide and implement the policy.
- 12.3** All staff will be responsible for:
- 12.3.1** The delivery and implementation of this Policy;
  - 12.3.2** Promoting racial equality and good race relations and not discriminating because of race;
  - 12.3.3** Keeping abreast of race relations legislation by attending training and information opportunities;

- 12.3.4** Familiarising themselves with all amendments and updates to the policies or procedures of which they might be notified by Human Resources from time to time; and
- 12.3.5** Ensuring that all new members of staff receive a copy of this policy and codes of practice and achieve an understanding and appreciation of its central role in informing Ravensbourne's operations.

**12.4** All students have a legal and moral responsibility for:

- 12.4.1** Adhering to the standards of behaviour expected by Ravensbourne through this Race Equality Policy and supporting Codes of Practice;
- 12.4.2** Ensuring that at no time do any of their actions or omissions constitute an act of discrimination, harassment and ultimately victimisation;
- 12.4.3** Promoting understanding, empathy and respect for all cultures, encouraging an appreciation and understanding of a range of beliefs and religious convictions as they relate to race equality; and
- 12.4.4** Identifying any possible barriers to race equality and assisting Ravensbourne in the removal of those barriers.

## **13 Assessing the Impact of Policies**

- 13.1** Ravensbourne has a duty to assess the impact of its policies (including the Race Equality strand of the Equality and Diversity Policy) on students and staff from different racial groups. For this purpose, the term "policies" includes not only formal written policies but also informal and unwritten policies, practices and decision-making processes and functions which qualify as being race equality relevant and which may have an impact on members of different racial groups.

## **14 Publication**

- 14.1** The Race Equality strand of the Equality and Diversity Policy will be reviewed annually.
- 14.2** Following the annual review, digital copies will be made available to all staff and service providers.
- 14.3** Ravensbourne will publish the results of its assessments and monitoring under this policy annually.

- 14.4** The material will be accessible on Ravensbourne’s intranet site at <http://intranet.rave.ac.uk/>. A copy of it will also be available in printed form and if requested, be made available in alternative formats, for example Braille disk, audio cassette and minority languages. These can be obtained by contacting Human Resources.

## **15 Compliance, Complaints and Links with other Policies**

- 15.1** This policy complements Ravensbourne’s Equal Opportunities Policy, Bullying and Harassment Code of Practice, and staff and student complaints/grievance and disciplinary procedures. Any act or omission by any member of staff or student or service provider which is not compatible with Ravensbourne’s duties to promote good race relations, eliminate race discrimination and to promote equality of opportunity, will be treated very seriously by Ravensbourne and may lead to disciplinary action up to dismissal/ exclusion from Ravensbourne. In the case of service providers this may lead to termination of the service contract.
- 15.2** The Macpherson Report defines a racist incident as: ‘any incident which is perceived to be racist by the victim or any other person’.
- 15.3** It is clear from the Macpherson Report that the consequences of a failure to adopt transparent and robust equality policies and procedures can be divisive, wide ranging and render the functioning of Ravensbourne impossible.
- 15.4** Direct Discrimination means treating one person less favourably than another because of race. This type of behaviour can occur because of the individual’s race, the individual’s perceived race or the individual’s association with another person of a particular race. Direct Discrimination is unlawful under the Equality Act 2010.
- 15.5** Indirect Discrimination means that a rule or condition that is applied equally to everyone can be met by a considerably smaller proportion of people from a particular racial group; the rule is to their disadvantage; and the condition or rule cannot be justified on non-racial grounds. All three conditions must apply.
- 15.6** Bullying and harassment may take many forms. For example: derogatory comments, undermining of status or authority - whether by direct or indirect means, or whether physically or mentally. It may take place via e-mail, face-to-face, and over a long or short period of time.

## **15.7 Staff, students and service providers:**

**15.7.1** Must be assured that if they have any concerns (however trivial or seemingly inconsequential) about any individual incident or ongoing or established practice or procedure they must feel encouraged to raise these immediately. It should be clearly understood that it is the individual responsibility of everyone to work towards eliminating racial discrimination and to promote equal opportunities and good relations between people of different racial groups.

**15.7.2** Will be provided with clear avenues of complaint and processes and redress in the Student Contract Handbook and the Equal Opportunities Complaints Procedure at the back of this document. Any individual who believes that they have been subjected to racial discrimination and / or harassment will be advised to follow the Staff Complaints Procedure contained within the Equal Opportunities Policy and Codes of Practice / Student Complaints Procedures detailed in the Student Contract Handbook.

## **16 Training and Policy Dissemination**

### **16.1 Ravensbourne will ensure that:**

**16.1.1** The Board of Governors have access to the E-learning equality modules which address race equality issues;

**16.1.2** All new members of staff and students receive induction training in relation to Ravensbourne's commitment to the promotion of good race relations and the elimination of racial discrimination and in relation to the implementation of this policy;

**16.1.3** All staff receive appropriate 'refresher' training at least once every three years; and

**16.1.4** Those responsible for the appointment and supervision of short term temporary staff give appropriate information and training in Ravensbourne's Equal Opportunities policy and procedures.

## **17 Consultation on the Policy**

**17.1** In revising the Race Equality strand of the Equality and Diversity Policy, Ravensbourne will consult with staff via departments and

Schools as well as members of staff and students from different racial and community groups.

## **18 Disability Policy & Procedure**

### **Introduction**

- 18.1** Ravensbourne recognises and is committed to meeting its responsibilities towards its staff and the community at large to ensure that disabled people are afforded equal opportunities to enter employment and progress within the Institution.
- 18.2** Ravensbourne aims to be recognised by the community as an employer which provides good employment opportunities for disabled people, and we wish individuals who apply to us for employment to know that they will receive fair treatment and be considered solely on their ability to do the job.
- 18.3** If an employee becomes disabled during the course of their employment with the Institution, all reasonable steps will be taken to accommodate the individual's disability by making reasonable adjustments to working practices, physical features and arrangements, or by offering auxiliary aids, redeployment and/or appropriate retraining to enable them to remain in employment with the Institution wherever that is possible.
- 18.4** All staffing policies have been reviewed to ensure that Ravensbourne's policies, procedures and practices are supportive both of disabled staff at the Institution and of its disability management process.
- 18.5** Ravensbourne aims to continue to raise awareness of disability throughout the organisation in order to promote equality and positive attitudes towards disabled people. For example, the Institution will continue to endeavour to provide staff training on disability awareness for all staff involved in recruitment and selection processes.
- 18.6** This policy applies to all members of staff, but is non-contractual and Ravensbourne reserves the right to amend this policy without prior notice.

### **19 Scope**

- 19.1** Direct disability discrimination can occur where an individual is treated less favourably than another person would be treated in the same circumstances because of disability. This type of behaviour can occur because of the individual's disability, the individual's perceived

disability or the individual's association with someone who has a disability.

**19.2** Indirect disability discrimination can occur where there is a rule, policy or practice which seems to apply equally to everyone, actually puts disabled people at a particular disadvantage compared with people who do not share that disability and the rule, policy or practice cannot be objectively justified.

**19.3** Actions and behaviour considered to be unacceptable include the following, although the list should not be considered exhaustive:

**19.3.1** unwelcome and persistent attention drawn to a person's disability, which the harasser may perceive as being helpful or kind but which results in the individual feeling targeted and harassed;

**19.3.2** inappropriate behaviour whether in the form of offensive or intimidating comments or gestures or insensitive jokes or pranks, which targets an individual's disability, even if not deliberately made to hurt the individual targeted;

**19.3.3** Ignoring or shunning a colleague, for example, by deliberately excluding them from a conversation or workplace social activity because of their disability;

**19.3.4** The use of derogatory language towards or relating to disabled individuals whether oral or written, for example during lectures, tutorials, meetings or interviews; and

**19.3.5** Harassment of disabled individuals.

## **20 Recruitment and Selection**

**20.1** The HR team, in consultation with the relevant line managers will seek to ensure that:

**20.1.1** All disabled candidates who meet the essential criteria detailed in the person specification will be invited for interview.

**20.1.2** Candidates are told clearly how the selection process will operate and will be asked whether they would like any adjustments to assist them in the recruitment process.

- 20.1.3** Disabled applicants receive full and fair consideration for all types of vacancies, as well as for training, career development and promotion through the consistent application of the appropriate procedures;
- 20.1.4** The Institution's equality of opportunity statement and disability strap-line will be incorporated into job adverts; and
- 20.1.5** Appropriate action will be taken to encourage applications from disabled people.
- 20.2** The HR team is responsible for maintaining close contact with:
- 20.2.1** Disability Rights UK (an externally contracted service) to promote and publicise job vacancies on behalf of the Institution, with the various external disability recruitment organisations; and
- 20.2.2** The Disability Symbol Co-ordinator at the local Jobcentre Plus, who will continue to advise the Institution in respect of further developments that may be appropriate relating to the recruitment and retention of disabled people.

## **21 Employment with Ravensbourne**

- 21.1** A risk assessment will be undertaken before the disabled employee begins work. A copy of the risk assessment will be kept in their personnel file. Where appropriate, a personal emergency evacuation plan will also be completed in consultation with the individual. This plan may need to be shared with relevant members of staff, including Institution fire wardens.
- 21.2** The Institution will make adjustments where this is reasonable and practical, to the working environment, to working practices and where possible, to terms and conditions of employment in order to ensure that a disabled member of staff is not placed at a disadvantage compared to other staff.
- 21.3** Where adaptation of the Institution's premises is required to enable a disabled staff member to take up employment, HR will liaise with the relevant internal and external individuals to facilitate the appropriate reasonable adjustments.
- 21.4** HR will be responsible for ensuring that the Reasonable Adjustment Request Form is completed in respect of each disabled employee. Before decisions are taken about whether adjustments can be made,

HR will ensure that they have been fully investigated, including carrying out a consultation with the employee concerned, and taking appropriate internal and external advice. Having taken advice as appropriate, HR will be responsible for deciding whether or not the provision of an adjustment will be possible and/or reasonable and for communicating that decision to the individual concerned.

- 21.5** Where advice is needed on a medical condition or on the safety implications of recruiting a disabled employee, HR Officer who will work with the Health Safety Environmental and Quality Manager will contact the Employment Medical Advisory Service for guidance.
- 21.6** The induction programme is important to the successful integration of a new employee into a new job. Following a job offer, HR will organise a meeting to discuss the individual requirements before the employee starts work so that the necessary provision(s) is / are in place on their first day of work. Where reasonable adjustments cannot be made before the agreed start date, the Institution will consider whether the employee may commence work in any event or whether it may be appropriate for the employee to be given special paid leave until they can start work.
- 21.7** Ravensbourne will take specific steps to ensure that disabled staff have the same opportunities as other staff for career development and training, in order that they may achieve their full potential within the Institution.

## **22 Disabilities Arising During Employment**

- 22.1** Ravensbourne is committed to retaining staff who become disabled whilst employed wherever possible.
- 22.2** It is well known that acquiring a disability or experiencing gradual loss of a function can lead to uncertainty, insecurity, and loss of confidence. The Institution aims to ensure that a flexible, understanding and supportive approach to the management of disabled staff will enable them to continue to effectively contribute to their department / cluster and the Institution.
- 22.3** The Institution understands that staff may be reluctant to disclose their disability for many reasons including a fear of discrimination. It is within this context that the Institution will strive to ensure that it continues to cultivate positive attitudes towards disabled people and disability related issues. In time, this will hopefully encourage greater

openness amongst staff, who might, at some point during their career at the Institution, become disabled and wish to declare it so that they can receive any required support.

- 22.4** With the agreement of the member of staff concerned, a referral will be made for them to see the Institution's occupational health provider, with a view to providing HR with a better understanding of the individual's disability and work-related requirements.

## **23 Disclosing disabilities to Ravensbourne**

- 23.1** It is widely understood that most disabled people acquire their disability or health condition during their working lives. In order that the Institution can be aware of which employees are disabled and require specific management or support related to their disability or health condition, all staff will be given an opportunity, during their staff appraisal meetings, to disclose:

**23.1.1** If they have acquired a disability or long term impairment since their last appraisal meeting;

**23.1.2** Whether there has been any change in the effect of an existing disability or health condition;

**23.1.3** If any existing reasonable adjustments are sufficient; and

**23.1.4** If they would like to discuss the provision of (additional) reasonable adjustments.

**23.2** Where a member of staff informs their line manager of their disability or health condition, the line manager will seek to reassure them that:

**23.2.1** Ravensbourne will be supportive and that its aim is to help them stay in work by making reasonable adjustments to meet their needs. This will, amongst other things, involve the staff member and line manager, in conjunction with HR, discussing what can be done to accommodate changes to working practices to enable the member of staff to continue working effectively; and

**23.2.2** This process is confidential

## 24 Grievances

**24.1** Ravensbourne is committed to ensuring that staff feel able to raise any concerns they have about their treatment in a safe environment. If any disabled employee considers that they have been treated in a way that is contrary to this policy, the issue should be raised with their line manager or directly with HR if it is not possible or appropriate to raise it with their line manager. Every effort will be made to secure a satisfactory resolution, either through informal measures or formally through the Institution's grievance procedure.

## 25 Confidentiality

**25.1** If a member of staff discloses that they have a disability or health condition, they may want this information to remain confidential. If a reasonable adjustment is needed, as the line manager, you will need to know that an adjustment to work is required. However, neither you nor other colleagues in the department / school need to be told the precise reasons for the adjustment, if the disabled staff member prefers that it remains confidential.

**25.2** Where a disabled member of staff needs the support of colleagues so that the implementation of adjustments can be successful, you should communicate this and try to encourage them to be open about the disability or health condition or about what they need to help them in their job. If the member of staff still wants the information to remain confidential their view must be respected.

## 26 Disability Management Process

**26.1** When managing a disability or health condition that is affecting a member of staff's attendance and / or performance at work, as the line manager, you should arrange a meeting with them at the earliest opportunity in order to:

**26.1.1** State your concerns regarding performance and / or attendance. It is important to stress that the reason for the meeting is to understand whether the difficulties being experienced are as a result of their disability and for you to know what, if any, adjustments can be made to help them. You will need to bear in mind that the member of staff may not be comfortable discussing a disability or health issue and they may initially point to other reasons to explain changes in performance or attendance;

- 26.1.2** Aim to reach an agreement with the member of staff about their current level of performance and/or attendance and why it is happening and agree specific actions to address the performance and / or attendance issues, together with any additional support or resources that are required;
- 26.1.3** Explain to the member of staff that you will organise regular meetings for the two of you to ensure that there is an on-going review and feedback to them. The review process should continue when performance begins to improve. You should not assume that any poor performance was unrelated to disability if there is a quick improvement. In some instances, having had performance issues raised, the member of staff may be working harder than they should at that time to cover up the effects of a disability and this may have serious longer-term consequences for them and the Institution;
- 26.1.4** Where the issue is concerned with behaviour, rather than performance, you will need to talk about specific behaviour and its effects, rather than to make general observations about the individual. The discussion with the member of staff should however result in the same outcomes as for issues related to performance, i.e. aiming to reach agreement about how their behaviour will be treated; and
- 26.1.5** Identify and record adjustments to help the employee improve, as appropriate their performance / attendance and agree targets for improvement, to reduce the number or length of absences, or to allow for occasional, planned absences. Please use the Reasonable Adjustments Request Form at the end of this document.

## **27 Reasonable adjustments**

- 27.1** The list below is intended as a guide. It is not exhaustive but provides examples of reasonable adjustments that may be appropriate in particular instances:
- 27.1.1** Providing equipment or altering working arrangements as the member of staff's work space may be aggravating the condition and contributing to their level of absence;
- 27.1.2** Reallocating, temporarily (or permanently) some of the member of staff's tasks to other colleagues, particularly where they are absent from the Institution, and tasks that are urgent cannot wait until the member of staff returns to work;

- 27.1.3** Restructuring the member of staff's job role. This could involve doing the job differently or to a different schedule (flexible working);
- 27.1.4** Based on the job description, dividing the tasks into essential and marginal functions with a view to establishing which tasks may offer scope for restructuring by, for example, assigning particular tasks to other colleagues or a temporary or permanent basis or swapping tasks;
- 27.1.5** Additional breaks during the working day that are accommodated by an extended working day; or
- 27.1.6** Help from Access to Work with for example, taxi fares if this is something which is required by the member of staff.
- 27.2** Ravensbourne will make every effort to arrange reasonable adjustments that can take place within the resources available. However, if Ravensbourne cannot fund the adjustments within its resources, the employee, with the support of HR, can apply to the Access to Work scheme led by the Department for Work and Pensions. Further information can be found on the DWP website.
- 27.3** A Form has been designed to help Ravensbourne determine the nature of the reasonable adjustment(s) sought and decide whether the adjustment(s) requested is reasonable. The form is available from the HR pages on the Intranet. Once completed it will be held on the individual's confidential Personnel File and will only be shown to their line manager.
- 27.4** Further information may be needed from the individual and/or the line manager, and expert advice and/or an assessment may be sought where necessary. The views of other colleagues may also be sought where appropriate, and in accordance with the signed employee consent form.
- 27.5** The form should be completed by the employee, with the help of HR, and then be submitted for consideration to the director of human resources and organisational development. A formal letter will be sent to the employee informing them of the outcome.
- 27.6** Where reasonable adjustments are provided with the approval of the member of staff concerned, as the line manager, you may need to brief colleagues within the department / school about the nature and purpose of the adjustments, especially where there may be a

perception or favoured treatment because of, for example, reduced working hours or the provision or specialised equipment.

**27.7** Where it is anticipated that the individual will be absent from the Institution for a long period of time the following factors should be taken into consideration:

**27.7.1** Whether and for how long other staff can cover the absent staff member's workload;

**27.7.2** The potential disruption that may be caused by the member of staff's absence;

**27.7.3** Whether or not a temporary replacement can be recruited and how much this will cost; and

**27.7.4** The size and resources of the Institution and its ability to absorb the cost.

## **28 Disability Rehabilitation**

**28.1** Where a member of staff's disability has necessitated a period of absence from the Institution, depending on the length of absence, a process of disability rehabilitation may be necessary.

**28.2** Disability rehabilitation is a process that starts with an assessment of the employee's work potential and the adaptations that can be made to enable the employee to remain in their job. Once it has been decided the employee can return to their present job (or move to another), a programme of rehabilitation and retraining may be necessary.

**28.3** It will be the responsibility of HR to liaise with the line manager and member of staff so make an informed decision on the way forward, during which time, the employee's job is protected. Part of the discussion might, for example, include whether a phased return to work is appropriate.

## **29 Redeployment / suitable alternative employment**

**29.1** If, after adjustments have been made and / or restructuring of the employee's role has been considered, retention in their current job is not practical, redeployment or suitable alternative employment may be appropriate where suitable job opportunities exist.

**29.2** This would require the line manager to:

**29.2.1** Establish what transferable skills the member of staff has that can be used effectively in another role;

**29.2.2** Define the member of staff's range of skills, experience and ability, linked to career aspirations; and

**29.2.3** Identify any training or adjustments that could expand that range of skills.

## **30 Termination of Employment**

### **30.1 Capability**

**30.1.1** Where a member of staff's performance falls to an unacceptably low standard through deterioration in their health caused by a disability, HR, together with the line manager and the member of staff will:

- Explore the possibility of restructuring the job to allow for the continuation of employment; and
- Consider alternative employment and any other reasonable adjustments which could be made to improve performance to acceptable levels

**30.1.2** If, after considering the above options, it is apparent that the member of staff cannot realistically continue in employment, Ravensbourne may have no option but to bring their contract of employment to an end. In these circumstances the appropriate policies / procedures will be followed.

### **30.2 Redundancy**

**30.2.1** In a redundancy situation, the particular circumstances of a disabled employee will be given appropriate consideration. Reasonable adjustments will be made to the selection criteria and the procedure followed throughout in order to prevent a disabled employee from being disadvantaged by methods used to implement redundancies, including selection criteria and scoring.

## **31 Gender Policy**

**31.1** This document is a summary statement and should be read in conjunction with the Gender Action Plan. Ravensbourne is committed to gender equality and eliminating sex discrimination.

**31.2** Direct sex discrimination occurs where a person is treated less favourably, because of gender, than another person would be in similar circumstances. This type of behaviour can occur because of the individual's gender, the individual's perceived gender or the individual's association with a particular gender.

**31.3** Indirect sex discrimination can occur where a requirement or condition applied equally to men and women discriminates indirectly because the proportion of one sex which can comply with it is much smaller than the proportion of the other sex which can comply with it; the rule is to their disadvantage; and the condition or rule cannot be justified on grounds unrelated to gender. All three conditions must apply.

**31.4** Actions and behaviour considered to be unacceptable include the following, although the list should not be considered exhaustive:

**31.4.1** Unwanted physical conduct or "horseplay". Physical conduct ranges from touching, pinching, pushing or brushing past someone or invading their personal space, to grabbing, shoving, punching and more serious forms of physical or sexual assault.

**31.4.2** unwelcome sexual behaviour, which the harasser may perceive as harmless flirting, and which may involve unwanted suggestions, advances, propositions or pressure for sexual activity suggestions that sexual favours may further an employee's career or that refusal of sexual favours may hinder it;

**31.4.3** Continued suggestions for social activity within or outside the workplace after it has been made clear that such suggestions are unwelcome;

**31.4.4** Inappropriate behaviour whether in the form of offensive or intimidating comments or gestures or insensitive jokes or pranks;

**31.4.5** The sending or displaying of material that is pornographic or obscene or that some individuals or groups may find offensive (including e-

mails, text messages, video clips and photographs taken or sent using mobile phones or via the internet); and

**31.4.6** Ignoring or shunning a colleague, for example, by deliberately excluding them from a conversation or a workplace social activity.

## **32 Sexual Orientation Policy**

- 32.1** Ravensbourne is committed to sexual orientation equality and eliminating sexual orientation discrimination.
- 32.2** Direct sexual orientation Discrimination occurs when an individual is treated less favourably than another person would be in similar circumstances because of sexual orientation. This type of behaviour can occur because of the individual's sexual orientation, the individual's perceived sexual orientation or the individual's association with a particular sexual orientation.
- 32.3** Indirect sexual orientation discrimination can occur where a requirement or condition applied equally to those of different sexual orientation discriminates indirectly because the proportion of one sexual orientation which can comply with it is much smaller than the proportion of the other sexual orientation which can comply with it; the rule is to their disadvantage; and the condition or rule cannot be justified on grounds unrelated to sexual orientation. All three conditions must apply.
- 32.4** Actions and behaviour considered to be unacceptable include the following (although this list is not exhaustive):
- 32.4.1** The use of anti-gay and anti-lesbian language, comment or innuendo, whether oral or written, for example during lectures, tutorials, meetings or interviews;
- 32.4.2** Harassment of gay, lesbian, bisexual or heterosexual individuals; and
- 32.4.3** Bringing and/or disseminating discriminatory material such as leaflets or magazines in Ravensbourne.
- 32.4.4** All incidents involving students will be investigated by a senior academic. In the case of a member of staff they will be investigated by a senior member of staff. Where found to be of substance, allegations will be dealt with through Ravensbourne's Grievance and/or Disciplinary Procedures.

### **33 Age Policy**

- 33.1** The provisions of the Equality Act 2010 prohibit discrimination and harassment on the grounds of age in recruitment, employment, termination of employment and post-employment. There is no minimum or maximum age under the Regulations and as such, all individuals whether younger or older are protected against unlawful age discrimination.
- 33.2** Both as an employer and educational Institution, Ravensbourne is opposed to unlawful ageism and its manifestations. Through the provision of Equal Opportunities training Ravensbourne aims to raise awareness of and prevent ageism amongst staff.
- 33.3** In its policies and procedures, Ravensbourne wishes to establish and maintain non-discriminatory practices within Ravensbourne in relation to ageism.
- 33.4** Both direct discrimination (less favourable treatment because of age) and indirect discrimination (a provision, criterion or practice applied to all but which disadvantages a particular age group) may be justified (and therefore not unlawful) if it is a proportionate means of achieving a legitimate aim. Direct discrimination can occur because of the individual's age, the individual's perceived age or the individual's association with a person of a particular age.
- 33.5** The recruitment and appointment of staff is made on the basis of relevant ability and potential. Opportunities for promotion are made known to all staff and are available to all on a fair and equal basis through the Promotion and Salary Increase Policy and Procedure. An individual's age will not be taken into account in any such employment decisions, nor will assumptions be made about an individual's abilities or potential on the basis of their perceived age, whether older or younger, unless this would be justified within the terms of the Regulations.

## **34 Pay and Benefits**

Through a process of periodic pay auditing, Ravensbourne aims to ensure that decisions regarding pay continue to be rooted in a robust job evaluation system.

### **34.1 Retirement and Pensions**

Ravensbourne will work with individuals positively, throughout their career to ensure their needs are met and will consider all Flexible Retirement requests, taking into account the potential benefits for Ravensbourne as well as the individual concerned.

### **34.2 Redundancies**

If redundancies become necessary, the retention of staff will be prioritised by reference to skills and expertise and not to consideration of age or length of service or other unlawful grounds.

### **34.3 Flexible Working**

Ravensbourne considers applications for flexible working from all staff, regardless of circumstances, whether it is a legal right or not. This applies equally to all age groups

### **34.4 Training and Development**

All staff have equal access to the application process for training and professional development support and activities.

### **34.5 Monitoring**

Ravensbourne collects 'date of birth' data which is contained in the Equal Opportunities Monitoring Form. This information is not available for shortlisting panels. The information is retained by HR for annual statistical reporting purposes.

### **34.6 Medical**

If it necessary for an individual to undergo a medical examination e.g. as a condition of recruitment, no judgments will be made about the person's abilities or fitness for the role on the basis of age.

## **35 Religion or Belief Policy**

- 35.1** Ravensbourne is committed to religion and belief equality and eliminating discrimination because of religion or belief.
- 35.2** Direct religion or belief Discrimination occurs when an individual is treated less favourably than another person would be in similar circumstances because of religion or belief. This type of behaviour can occur because of the individual's religion or belief, the individual's perceived religion or belief or the individual's association with a person of a particular religion or belief.
- 35.3** Indirect discrimination can occur where a requirement or condition applied equally to all staff and students discriminates indirectly because the proportion of individuals with that religion or belief that can comply with it is much smaller than the proportion of individuals without that that religion or belief who can comply; the rule is to their disadvantage; and the condition or rule cannot be justified on grounds unrelated to religion or belief. All three conditions must apply.
- 35.4** Actions and behaviour considered to be unacceptable include the following (although this list is not exhaustive):
- 35.4.1** The use of anti-religious or anti-belief language, comment or innuendo, whether oral or written, for example during lectures, tutorials, meetings or interviews;
- 35.4.2** Harassment of individuals due to their religion, belief, (or lack of belief); and
- 35.4.3** Bringing and/or disseminating discriminatory material such as leaflets or magazines in Ravensbourne.
- 35.5** All incidents involving students will be investigated by a senior academic. In the case of a member of staff they will be investigated by a senior member of staff. Where found to be of substance, allegations will be dealt with through Ravensbourne's Complaints, Grievance and Disciplinary Procedures.

## **36 Marriage and Civil Partnership Policy**

- 36.1** Ravensbourne is committed to marriage and civil partnership equality and eliminating discrimination because of marriage or civil partnership.
- 36.2** Direct of marriage or civil partnership Discrimination occurs when an individual is treated less favourably because they are married or in a civil partnership than a person of a different marital or civil status would be in similar circumstances.
- 36.3** Indirect discrimination can occur where a requirement or condition applied equally to all staff and students discriminates indirectly because the proportion of individuals who are married or in a civil partnership that can comply with it is much smaller than the proportion of individuals who are not married or in a civil partnership who can comply; the rule is to their disadvantage; and the condition or rule cannot be justified on grounds unrelated to marriage or civil partnership. All three conditions must apply.
- 36.4** Actions and behaviour considered to be unacceptable include the following (although this list is not exhaustive):
- 36.4.1** The use of language, comment or innuendo, whether oral or written, for example during lectures, tutorials, meetings or interviews;
- 36.4.2** Harassment of individuals due to their marital or civil partnership status; and
- 36.4.3** Bringing and/or disseminating discriminatory material such as leaflets or magazines in Ravensbourne.
- 36.5** All incidents involving students will be investigated by a senior academic. In the case of a member of staff they will be investigated by an external investigator. Where found to be of substance, allegations will be dealt with through Ravensbourne's Complaints, Grievance and Disciplinary Procedures.

## **37 Gender Re-Assignment Policy**

- 37.1** Ravensbourne is committed to gender re-assignment equality and eliminating discrimination because of gender re-assignment.
- 37.2** Direct gender re-assignment Discrimination occurs when an individual is treated less favourably than another person would be in similar circumstances because of gender reassignment. This type of behaviour can occur because of the individual's gender re-assignment, the individual's perceived gender re-assignment or the individual's association with a person who has undergone or is proposing to undergo gender re-assignment.
- 37.3** Indirect discrimination can occur where a requirement or condition applied equally to all staff and students discriminates indirectly because the proportion of individuals who have undergone gender re-assignment (or are proposing to do so) that can comply with it is much smaller than the proportion of individuals without that protected characteristic who can comply; the rule is to their disadvantage; and the condition or rule cannot be justified on grounds unrelated to gender reassignment. All three conditions must apply.
- 37.4** Actions and behaviour considered to be unacceptable include the following (although this list is not exhaustive):
- 37.4.1** The use of language, comment or innuendo, whether oral or written, for example during lectures, tutorials, meetings or interviews;
- 37.4.2** Harassment of individuals due to their gender status on the grounds of transvestism, transsexualism, intersex conditions or any process of gender reassignment, begun or complete; and
- 37.4.3** Bringing and/or disseminating discriminatory material such as leaflets or magazines in Ravensbourne.
- 37.5** All incidents involving students will be investigated by a senior academic. In the case of a member of staff they will be investigated by an external investigator. Where found to be of substance, allegations will be dealt with through Ravensbourne's Complaints, Grievance and Disciplinary Procedures.

## **38 Pregnancy and Maternity Policy**

- 38.1** Ravensbourne is committed to pregnancy and maternity equality and eliminating discrimination because of pregnancy and maternity.
- 38.2** Discrimination because of pregnancy or maternity is where an individual who is pregnant, suffering from a pregnancy related illness, has exercised or is exercising a right in relation to maternity leave is treated unfavourably because of that fact.
- 38.3** Actions and behaviour considered to be unacceptable include the following (although this list is not exhaustive):
- 38.3.1** The use of language, comment or innuendo, whether oral or written, for example during lectures, tutorials, meetings or interviews;
- 38.3.2** Harassment of individuals due to their biological status or they have taken or are on maternity leave; and
- 38.3.3** Bringing and/or disseminating discriminatory material such as leaflets or magazines in Ravensbourne.
- 38.4** All incidents involving students will be investigated by an external investigator. In the case of a member of staff they will be investigated by a senior member of staff. Where found to be of substance, allegations will be dealt with through Ravensbourne's Complaints, Grievance and Disciplinary Procedures.

## 39 Equal Pay Policy

### Background

- 39.1** Human Resources undertook an Equal Pay Audit with staff in post as at December 2014. Ravensbourne implemented the Framework Agreement using the Hay Evaluation system in October 2006. This was the second Equal Pay Audit undertaken since the successful implementation and was based on gender, ethnicity, disability, age, by academic/support, and by part-time/fulltime status. However, to give such a generic summary does not give an accurate overview and therefore the focus is based on relevant grading's.
- 39.2** Staff have been graded as either Administrator, Co-ordinator, Officer, Lecturer, Manager, Senior Lecturer, Course Leader, Middle Manager or Senior Manager, which is consistent with our internal grading structure, in order to give a more accurate overview.
- 39.3** The results of the audit have identified no significant pay differentials between the groups examined. Any differences that do exist are within the range of expectations for Ravensbourne which has been able to implement fair pay bands based upon the job description for the role, as a result of the vast majority of roles being individualised as opposed to generic.

## 40 Policy Principles

- 40.1** Ravensbourne is an equal opportunities employer and as such is committed to the principle of equal pay for all staff whilst in employment. Ravensbourne believes and strives to ensure that all staff receive equal pay for equal work.
- 40.2** In order to continue to endeavour that Ravensbourne maintains equal pay, Ravensbourne will continue to provide a transparent pay system which is based on objective criterion and free from bias. Ravensbourne will:
- 40.2.1** Regularly review and monitor all of its pay practices, including those who may be absent through long term sick leave, or on maternity leave;

**40.2.2** Continue to provide staff as necessary with information on Ravensbourne's pay practices, which include salary review letters, and policies on Grade Progression and Job Evaluation; and

**40.2.3** Conduct an Equal Pay Audit every 3 years.

## **41 Complaints**

**41.1** Complaints from staff who believe they are not paid on an equal basis should be made in the first instance to the relevant line manager in accordance with the Promotion Policy.

## **Bullying and Harassment Code of Practice**

### **42 Introduction**

- 42.1** Ravensbourne wishes to create and maintain a learning environment where every individual is treated with dignity and respect, and which is free from harassment or other forms of bullying. This policy sets out examples of the type of conduct that may constitute harassment or bullying and Ravensbourne's commitment to eliminating such conduct.
- 42.2** Where harassment or bullying is shown to have taken place it will be dealt with under the Disciplinary Procedure as a form of misconduct. In some cases, it may be treated as gross misconduct leading to summary dismissal of those responsible.
- 42.3** Under the Health and Safety at Work Act 1974 Ravensbourne has a duty to provide its staff and students with a safe place and system of work. This includes an environment free from harassment and bullying that may, in certain circumstances, also amount to unlawful discrimination.
- 42.4** Ravensbourne is also responsible for ensuring that staff and students are protected from unlawful harassment, bullying or discrimination in the course of their work on grounds of sex, sexual orientation, marital or civil partnership status, gender reassignment, race, religion or belief, colour, nationality, ethnic or national origin, disability, HIV/AIDS status or age.
- 42.5** Individual staff or students may also in some cases be held legally liable for harassing other staff or students or third parties, and may be ordered to pay compensation by a court or employment tribunal.

### **43 Harassment**

- 43.1** Harassment is defined as any unwanted physical, verbal or non-verbal conduct which has the purpose or effect of violating the recipient's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.
- 43.2** Harassment often (but not exclusively) targets the religion, colour, nationality, ethnic or national origin of the victim. However, it can relate to any protected characteristic with the exception of marriage

and civil partnership status and pregnancy or maternity. However, Ravensbourne does not tolerate harassment on any grounds.

**43.3** A single incident of unwanted or offensive behaviour to one individual can amount to harassment.

**43.4** Examples of harassment include:

**43.4.1** Inappropriate behaviour whether in the form of offensive or intimidating comments or gestures or insensitive jokes or pranks;

**43.4.2** The sending or displaying of material that is, for example, racist or sexist or that some individuals or groups may find offensive (including e-mails, text messages, video clips and photographs taken or sent using mobile phones or via the internet);

**43.4.3** Ignoring or shunning a worker, for example, by deliberately excluding them from a conversation or a workplace social activity; and

**43.4.4** Spreading malicious rumours or insulting someone by word or behaviour.

## **44 Bullying**

**44.1** Bullying may be characterised as offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power, through means that undermine, humiliate, denigrate or injure the recipient. Power includes both personal strength and the power to coerce others through fear or intimidation. Bullying is often a form of harassment and can undermine an individual's self-confidence, competence and self-esteem. As with harassment, bullying can take the form of physical, verbal and non-verbal conduct.

**44.2** Legitimate and constructive criticism of an individual's performance or behaviour, or reasonable requests made of an individual in the course of their employment will not constitute bullying.

**44.3** In coming to a decision on whether bullying and harassment has actually taken place, the defining principle is whether the behaviour was unacceptable by reasonable, normal standards and is disadvantageous or unwelcome to the person subjected to it.

## **45 Complaints Procedure**

- 45.1** It is important that any issues are resolved as quickly and as fairly as possible to maintain good working relationships. In most cases this can be done on an entirely informal basis.
- 45.2** However, there are occasions when a more formal approach may be necessary.
- 45.3** Staff should use Ravensbourne's Complaints Policy and Procedure for this purpose. Students should use the Student Complaints Procedure.
- 45.4** Both are designed to deal with individual complaints quickly, fairly, and confidentially.
- 45.5** All complaints made under these procedures will be treated seriously and with discretion. Proceedings and records of any complaint will be kept as confidential as possible, but individuals must appreciate that complaints cannot always be formally investigated on an entirely confidential basis. This is because complaints must be investigated fairly and in most cases the alleged harasser has a right to know who the complainant is and to have full details of the complaint they face so they can defend themselves. Ravensbourne will always ask a complainant for their consent before disclosing any information which might identify them to a third party, under this procedure.
- 45.6** Ravensbourne will make every effort to protect its staff and students from harassment, victimisation or discrimination for making a complaint or assisting in an investigation. Any acts of retaliation or intimidation against an employee or student will be treated as a disciplinary offence.
- 45.7** Employees and students will not be subjected to any future unfair treatment on the basis that they have made a complaint or assisted in an investigation under this procedure irrespective of the outcome.
- 45.8** However, staff and students should be aware that complaints of discrimination, harassment or victimisation maliciously which are not made in good faith, will be the subject of disciplinary action.
- 45.9** Even where a complaint is not upheld, consideration will be given to how the continuing relationship between the employee or student making the complaint and the employee or student against whom the

complaint has been made should be managed. This may involve, for example, arranging some form of mediation or counselling or in the case of an employee a change in the duties or reporting lines of either party.

- 45.10** Ravensbourne is committed to monitoring the effectiveness of its Equal Opportunities Policy and this Complaints procedure, and will take all necessary steps to eliminate any unjustified discrimination which is revealed by this monitoring process.
- 45.11** In order to achieve this, Ravensbourne will undertake regular reviews of the practical application of this procedure, of the outcome of individual complaints and/or of accumulated complaints to identify any trend(s) or patterns emerging and, if so, to analyse whether or not these are justified.