POLICY 008
EQUALITY AND DIVERSITY POLICY

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Policy 008: EQUALITY AND DIVERSITY

1. Purpose

1.1. This policy describes the way in which ACM approaches matters relating to student and staff equality, diversity and inclusion, and outlines ACM's commitment to fostering an equitable, inclusive, diverse and respectful environment for students, staff and all other stakeholders.

1.2. This policy outlines the steps ACM takes to embed an inclusive culture that is sensitive to the differing needs and expectations of its stakeholders and that reflects ACM's obligations under the Equality Act 2010 and, where applicable, the Public Sector Equality Duty. It also describes ACM's strategic approach to equality of opportunity, including alignment with our Office for Students-approved Access and Participation Plan (APP), which sets out our interventions to address risks to equality of opportunity for students from under-represented groups.

2. Policy Statement: Equality and Diversity

2.1. ACM is committed to ensuring that no individual is treated less favourably because of a protected characteristic under the Equality Act 2010 or for any other unlawful reason. ACM also seeks to avoid unfair treatment on other grounds, such as social or economic background, caring responsibilities or spent criminal convictions, where this is not required or permitted by law.

2.2 ACM values and promotes the contributions of all who study and work within the institution and upholds the rights of all individuals who engage with ACM, including prospective students and other stakeholders.

2.3 This policy provides ACM's overarching vision, values and commitments in relation to equality and diversity. It has been written to reflect changes in equality legislation, including the Equality Act 2010.

2.4 ACM upholds the right to equality of opportunity regardless of the nine protected characteristics defined in the Equality Act 2010: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race (including colour, nationality and ethnic or national origin); religion or belief; sex; and sexual orientation. For students, the Equality Act provisions on further and higher education do not extend protection to marriage and civil partnership in the same way as in employment, but ACM nevertheless seeks to avoid unjustified differential treatment on this ground.

2.5 ACM recognises that individuals are protected under the Equality Act 2010 from:

- direct discrimination, including discrimination because of association with someone who has a protected characteristic or because of a mistaken perception that a person has a protected characteristic;
- indirect discrimination;
- harassment;
- victimisation (for example, because they have raised or supported a complaint about discrimination);
- discrimination arising from disability; and
- failure to make reasonable adjustments for disabled people. For example, it would be unlawful to refuse a student access to a graduation ceremony because of concerns about the behaviour of their disabled child, or to overlook a student for a representative role because they care for a disabled relative.

The Student Experience

2.6 ACM is committed to:

- Ensuring and promoting equality through teaching and learning, and also in the selection, enrolment, assessment and progression of students.
- Providing tailored student support and guidance that reflects the diversity of student needs, both pre-entry and during their studies, ensuring that no student receives less favourable treatment based on protected characteristics.
- Support and guidance for students will be linked to their particular needs. It also means that ACM aims to promote equal respect for all people, to challenge prejudice and to prepare students to work in a multicultural and diverse society.
- Ensuring equality of opportunity for all under-represented groups of students through an up-to-date and regularly reviewed Access and Participation Plan (APP)

Principles

2.7 This policy is underpinned by principles to which all ACM students and stakeholders should adhere, namely:

- To create an environment in which individual differences and the contributions of all our staff and students are recognised and valued.
- That the successful implementation of the Policy is the responsibility of all ACM students and stakeholders.
- That all students and other stakeholders of ACM will be treated with fairness, respect and sensitivity.
- To aim to create and maintain a working and learning environment where all stakeholders will have the opportunity to fully participate in order to achieve their full potential in a climate free from discrimination, bullying or harassment.

2.8 This policy applies to all staff, students and visitors to ACM. Where students are working at premises other than ACM locations, they will be subject to the policy.

2.9 This policy covers all behaviour by the individual, including online platforms such as the Virtual Learning Environment, email, communications channels, distribution media and platforms and across any social media.

2.10 Breaches of this policy will be regarded as misconduct and could lead to disciplinary proceedings in line with our Student Disciplinary Policy.

Implementation

2.11 The Equality Act 2010 introduced the Public Sector Equality Duty (PSED), which requires ACM, in the exercise of its functions, to have due regard to the need to: eliminate discrimination, harassment, victimisation and other conduct prohibited by the Act; advance equality of opportunity between people who share a protected characteristic and those who do not; and foster good relations between people who share a protected characteristic and those who do not.

2.12 Implementation of this policy is managed via ACM, School and Department plans, which will take account of ACM's commitment to Equality and Diversity and seek to implement its provisions.

2.13 ACM will ensure that its strategic plan has a commitment to equality and diversity; that they receive and review reports on student equality, diversity and widening participation, that they agree relevant equality targets and impact measures and monitor progress towards these. This is governed by the Student Experience and Opportunity Board.

2.14 The Senior Management Team and governing body will provide visible leadership on equality, diversity and inclusion, receive and scrutinise regular reports on equality data and outcomes for students and staff, and ensure that equality considerations are embedded in strategic planning, risk management and quality assurance processes.

Monitoring

2.15 The effectiveness of this policy in ensuring we are meeting our obligations will be monitored through regular collection and analysis of data that should be as unobtrusive to individuals as possible, commensurate with this objective.

2.16 ACM monitoring of the implementation and effectiveness of the Policy in relation to students will be the responsibility of the Student Experience and Opportunity Board, which will receive regular reports from the Student Wellbeing and Additional Needs and Disability Committee and the Access and Participation Strategic Intervention Groups, and which in turn reports into the Senior Management Team.

2.17 Where applicable, ACM will publish appropriate equality information and set, monitor and review equality objectives in line with the Public Sector Equality Duty and regulatory expectations, including the Office for Students' focus on access, continuation, attainment and progression for students from under-represented groups.

Addressing Discrimination, Harassment and Victimisation

2.18 ACM will:

- Actively challenge and tackle all forms of prejudice, discrimination and stereotypical attitudes.
- Address allegations of discrimination, harassment, and victimisation sensitively, and investigate them promptly, fairly, and thoroughly.
- Treat any form of discrimination, harassment or victimisation carried out by an individual as a matter for possible disciplinary action. This includes harassment by a third party.
- Where allegations relate to staff, they will normally be addressed under the relevant staff disciplinary or grievance procedures. Where allegations relate to students, they will normally be addressed under Student Conduct and Discipline Policy.

Publicity

2.19 The image ACM projects of itself in its promotional material, advertising and public relations activity, sends messages about the people ACM expects and wishes to serve. ACM's publicity will be regularly reviewed to ensure that:

- It is non-discriminatory to any group or individual.
- It is provided in hard copy and electronic forms to ensure that information is widely available and accessible by individuals with a range of needs.
- It gives a positive image of a place which welcomes everyone for education and training.
- Applications from members of disadvantaged or underrepresented groups are actively encouraged in areas where such groups might be underrepresented.

2.20 Every effort will be made to ensure that appropriate publicity reaches all groups in the community, enabling the widest possible recruitment.

2.21 All ACM students and potential students should be made aware of:

- The available study support.
- The services available within ACM to support students with additional learning needs.
- ACM counselling and guidance services.
- The availability of careers guidance and industry related opportunities and enrichment activities.

Student Recruitment

2.22 The process of gaining admission to ACM programmes will be clearly expressed and structured to allow, wherever possible, ease of access to all students throughout the year, where appropriate. Prospective students will be offered support and guidance at all stages

Admissions procedures will be designed and applied to ensure that no applicant is treated less favourably because of a protected characteristic, and that decisions are based on transparent and relevant criteria..

2.23 During the admissions and enrolment process, students will be invited to provide information about their protected characteristics and any additional learning or access needs. Providing this information is voluntary. Where provided, it will be processed in line with data protection law and used for the purposes of providing support, monitoring equality of opportunity, fulfilling regulatory obligations and informing reasonable adjustments and inclusive practice.

2.24 No ACM employee will discriminate unfairly, directly or indirectly in the guidance and recruitment of students.

2.25 Students with additional learning needs and special educational needs will be given the opportunity to discuss ways of overcoming any problems of access (in its widest sense, including access to the curriculum) and should be actively involved in problem solving. In line with the Equality Act 2010, ACM will consider and implement reasonable adjustments, where proportionate, so that disabled applicants and students are not placed at a substantial disadvantage compared with those who are not disabled.

Access to the Curriculum

2.26 ACM is an open-access institution that seeks to offer learning opportunities to all, including non-traditional learners. However, ACM will balance its desire to support access into ACM programmes with the need to ensure learners can demonstrate they have the required competent standards to thrive on the programme before they are admitted.

2.27 Programme handbooks, syllabi, and resources will be regularly reviewed to ensure they are free from direct or indirect discrimination against any student group.

2.28 Programme design, teaching, learning resources and assessment methods will be periodically reviewed to identify and address potential barriers or differential impacts on particular student groups, and to promote inclusive practice.

2.29 Programmes should be accessible to as wide a range of students as possible, by enhanced flexibility in both delivery and timing.

2.30 Learning Support will be made available to all students requiring it, subject to resources.

2.31 Ways of modifying curriculum delivery to allow access to classes to individuals with additional learning needs or special educational needs should continue to be sought.

2.32 Assistive technologies will be developed and deployed to assist and enhance the participation of students with disabilities and impairments in their use of learning opportunities.

2.33 Learning opportunities will be provided for targeted groups to facilitate access and opportunity.

2.34 Procedures for accreditation and assessment will, wherever practicable, be flexible and responsive to the needs of the whole range of students who attend ACM.

2.35 ACM is committed to providing its students with information, guidance and counselling, which will enable individuals to manage their personal development.

Equality and Diversity related concerns

2.36 Any student who believes they are being discriminated against on the basis of a protected characteristic such as disability, gender, gender reassignment, ethnic origin, race, age, sexual orientation, religion or belief, pregnancy/maternity, or marital/civil partnership status or on other unlawful grounds such as socio-economic status, should raise the matter, formally or informally as appropriate, with one of the following:

- Their Pathway Leader
- Executive Dean of Education
- Head of Education Delivery and Development
- Academic Registrar
- Assistant Registrar (Admissions and Student Records)
- Assistant Registrar (Risk and Retention)
- Quality Assurance and Enhancement Manager

2.37 The Student Complaints and Grievance Procedure is available for cases of alleged discrimination against students.

2.38 All complaints will be taken seriously by the person receiving them and the appropriate process will be followed to respond to the complaint. Complaints provisions are subject to regular review under the Quality Assurance and Enhancement policy and procedures.

2.39 Where a student has exhausted ACM's internal complaints procedures and remains dissatisfied, they may be able to refer their complaint to the Office of the Independent Adjudicator for Higher Education (OIA), in line with ACM's published guidance.

ACM Environment

2.40 By adapting and modifying the environment and facilities where appropriate, ACM will strive to make students, staff, customers and visitors feel welcome.

2.41 Offensive material of a discriminatory nature will not be displayed in any part of ACM.

2.42 ACM communications and publication (internal and external) will not use language or images which are potentially discriminatory against any group or individual.

2.43 ACM will comply with its duties under the Equality Act 2010 to make reasonable adjustments for disabled students, applicants, staff and visitors. This includes taking anticipatory steps to identify and remove barriers to access in relation to premises, services, teaching, assessment and information

2.44 Consideration will continue to be given to the provision of off-site tuition, where appropriate, to the needs of disadvantaged groups.

Freedom of Speech

2.45 ACM has a statutory duty under the Higher Education and Research Act 2017 (HERA) to protect free speech within the law for all staff, students and visiting speakers, which includes protecting the right to express views that are controversial or unpopular. However, vigorous debate does not mean students should be expected to tolerate harassment. Speech or other expression that amounts to harassment is not protected. ACM promotes a culture that is open and tolerant of differences, and students can expect to be able to take part in all aspects of university life without being harassed.

3. Responsible Parties

3.1 The policy lead is responsible for the cyclical monitoring and review of the policy in liaison with the Quality Assurance and Enhancement Manager. The Equality and Diversity Policy lead is:

- Head of Diversity, Access and Participation

3.2 Decisions and appropriate actions in support of the implementation of the Policy will be authorised by the following designated staff:

- Academic Registrar (as Chair of Student Experience and Opportunity Board)
- Human Resources Manager
- Senior Management Team
- Executive Dean Education and their senior team
- Pathway Leaders
- Staff with line management responsibilities
- Designated Safeguarding Lead
- Quality Assurance and Enhancement Manager

3.3 All staff are responsible for familiarising themselves with this policy, undertaking relevant training and embedding equality, diversity and inclusion within their day-to-day practice, including teaching, assessment, student support, recruitment and line management as applicable.

3.4 All students are expected to treat others with dignity and respect and to comply with this policy and related conduct policies when engaging in learning, social or online activities associated with ACM.

4. Reference Points

4.1 Internal:

- Safeguarding Policy
- Student Complaints and Grievances Policy
- Student Conduct and Discipline Policy
- Staff Disciplinary Policy
- Data Protection Policy
- Staff Fair Processing Policy
- Staff Code of Conduct Policy
- Student Charter (Code of Conduct)
- Freedom of Speech Code of Practice

4.2 External:

- The Equality Act 2010 and associated regulations (including the Public Sector Equality Duty).
- Higher Education and Research Act 2017 (HERA)
- Office for Students regulatory framework and guidance on equality of opportunity and access and participation.
- Office for Students regulatory framework and guidance on higher education free speech duties.
- UK Quality Code for Higher Education, particularly expectations relating to access, participation and inclusive learning environments.
- Advance HE guidance on equality, diversity and inclusion in higher education.

5. Date of Approval and Next Review

Version:	1.4
Approved on:	16 September 2026
Approved by:	Executive Board
Executive next review:	At least every 3 years, or sooner if there are significant changes to legislation or regulatory requirements