

## **062. Equality, Diversity and Inclusion Policy**

<b>Policy owner:</b>	<b>Academic Director (CEO)</b>
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## Introduction

The success of any organisation depends on its people. Capitalising on what is unique about individuals and drawing on their different perspectives and experiences will add value to the way we do business and deliver our objectives.

We aim to create an environment that respects the diversity of staff and students and enables them to achieve their full potential, to contribute fully, and to derive maximum benefit and enjoyment from their involvement in the life of IFG.

To this end, IFG acknowledges its responsibilities to:

- Provide a secure environment in which all our students and staff can flourish and in which all contributions are received and considered without prejudice.
- Provide positive non-stereotyping information about different ethnic groups and people with disabilities.
- Make inclusion a thread which runs through all our activities in the delivery of our programmes of study.
- Create an ethos in which students and staff feel valued and secure.
- Build self-esteem and confidence in our students, so that they can then use these qualities to influence their own relationships with others.
- Remove or minimise barriers to learning, so that all students can achieve and have the best opportunity to reach their potential.
- Ensure that our teaching takes into account the learning needs of all students through our schemes of work and lesson planning.
- Uphold academic freedom and lawful free speech.

- Prevent and address instances of sexual misconduct, harassment and other unacceptable behaviours.
- Make clear to our students and staff what constitutes aggressive, discriminatory and racist behaviour.
- Identify clear procedures for dealing quickly with incidents of unacceptable behaviour.
- Make students and staff confident to challenge discriminatory, racist and aggressive behaviour.
- Promote equality of opportunity between disabled people and non-disabled people.

These rights carry with them responsibilities. IFG requires all members of the community to recognise these rights and to act in accordance with them in all dealings with fellow members of the organisation. In addition, IFG will comply with all relevant legislation and good practice.

No individual will be unjustifiably discriminated against. This includes, but not exclusively, discrimination because of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation.

### **Responsibility**

The Academic Director has the overall responsibility for ensuring that IFG operates within a framework of equality of opportunity.

The Academic Board will ensure that all policies, procedures and practices meet the highest standards of compliance and have due regard for equity, diversity and inclusion.

IFG recognises that all of its staff and students have a duty to support and uphold the principles contained in its Equal Opportunities Policy and supporting policies, working with other committees as appropriate.

### **Dealing with discrimination**

IFG is committed to creating and sustaining a positive and mutually supportive working environment for our staff and an excellent teaching and learning experience for our students, where individuals are equally valued and respected. Bullying, harassment or victimisation of any individual will not be tolerated and any allegations will be taken seriously and dealt with appropriately under the relevant procedures for students and staff.

### **Equality Impact Assessments (EIAs)**

As part of IFG's commitment to embedding inclusive practices and removing barriers for all students, not only those from underrepresented groups, IFG carries out Equality Impact Assessments (EIAs) where appropriate. EIAs enable the College to identify potential or existing barriers and to proactively consider and implement reasonable adjustments. This supports the College in meeting its anticipatory duty under the Equality Act 2010.

EIAs may be conducted in relation to both student and staff matters for key policies and student experience matters.

See Appendix A for IFG's Equality Impact Assessment Template and Guidance.



## **Bullying, discrimination, harassment, sexual misconduct and other unacceptable behaviours**

International Foundation Group (IFG) maintains a Single Comprehensive Source of Information (SCSI), which contains all IFG policies and procedures relating to harassment, sexual misconduct and inappropriate behaviour, in accordance with the Office for Students (OfS) Condition E6.

Our SCSI is on the IFG website and easily accessible for everyone and does not require a login or password. It can be found on our website in our Student Support Section. The page is called **Student Welfare at IFG London** - [Student Welfare at IFG - International Foundation Group \(IFG\)](#) and will be highlighted during staff and student induction so that all students and staff are aware of how to access.

The SCSI is the authoritative source for IFG staff, students and prospective students to refer to for all matters relating to harassment, sexual misconduct, inappropriate behaviour and other welfare matters.

The SCSI is updated as and when information such as contact details or relevant policies & procedures are changed or updated. Changes to policies and procedures are noted and dated on the individual documents. Students and staff should therefore always refer to the SCSI for the latest information and advice. Historical versions of policies and procedures are retained by IFG Management and can be requested by both students and staff if required for historic incidents.

Our SCSI contains all policies, procedures and the multiple steps that may be taken by IFG to protect students from harassment, sexual misconduct, inappropriate behaviour and any welfare issues as required under Condition E6. Our primary aim is to prevent incidents from occurring but if they do then we have robust support, reporting, investigation and information handling procedures in place to ensure resolution and a fair decision-making process.

This statement can be found in both student and staff handbooks as well as being highlighted and discussed during student and staff inductions. Any questions regarding the policies & procedures should be addressed to the Academic Director or Director of Studies.

Our SCSI is reviewed annually and maintained by our Marketing and Partnerships Director, Stefan Green – email [s.green@intfoundationgroup.co.uk](mailto:s.green@intfoundationgroup.co.uk)

## **Student Complaints against bullying, discrimination and harassment**

All students of IFG can make formal complaints against any kind of discrimination or inequality in treatment meted out to them under the Student Complaints Procedure and/or procedures under the Policy on Sexual Misconduct, Harassment and Unacceptable Behaviours. Allegations of bullying, discrimination, sexual misconduct and/or harassment or other unacceptable behaviours by students will constitute a breach of the Student Code of Conduct and will normally be referred into the Student Non-Academic Misconduct Procedures.

## **Staff Complaints against bullying, discrimination and harassment**

IFG Staff have the right to work in a professional environment free of discrimination. Procedures for staff to be able to raise concerns and/or complaints are outlined in the Staff Handbook. Allegations of bullying, discrimination, sexual misconduct and/or harassment or other unacceptable behaviours by staff will be dealt with under the initial investigation stage of the [Policy on Sexual Misconduct, Harassment and Unacceptable Behaviours](#) in the first instance. Such behaviours constitute a breach of the Staff Code of Conduct and will normally be referred into IFG HR disciplinary procedures.

## **Freedom of Speech and Academic Freedom**

IFG has a legal and statutory duty to protect and uphold academic freedom and lawful free speech. Our expectations and commitments around this are set out in our [Freedom of Speech Policy](#).

### **Complaints about Freedom of Speech**

Where any individual, whether part of the IFG community or not, believes that lawful freedom of speech and/or academic freedom has been prohibited, restricted or inhibited in some way, the IFG [Freedom of Speech Complaints Procedure](#) should be used.

All complaints against discrimination or inequality will be treated with due confidentiality. Where complaints about discrimination and harassment are progressed by IFG, relevant and proportionate information will be disclosed to complainants regarding findings and action taken, as part of the resolution of those matters of complaint.

The Academic Board monitors equality and diversity issues and ensures that this policy is implemented at all times. A summary statement and/or relevant data relating to EDI matters will be reviewed at least annually at Academic Board meetings for monitoring purposes and to inform ongoing and future institutional approaches and initiatives. Appropriate actions are planned and included in the Academic Board action plans where necessary.

The information related to ensuring Equal Opportunities will be used only for the monitoring purposes and shall always be kept confidential.

## APPENDIX A

**The IFG Equality Impact Assessment (EIA) Template**

To be completed by the person leading (The Lead Officer) on the development/change of policy, strategy or services

<b>Name of policy/ procedure/ strategy/ role (function)</b>	
<b>IFG Department</b>	
<b>Name and job title of person responsible for completing EIA</b>	
<b>Date of Assessment</b>	
<b>Briefly describe the aims, objectives and purpose of the new or change to policy/procedure/strategy/role</b>	
<b>What outcomes do you want to achieve?</b>	

### 1. Analysis of impact

The fundamental question which all EIA's must attempt to answer is: **Does the proposed changes to policies, procedures and practices have a disproportionate impact on people with a protected characteristic, whilst giving consideration to the Equality Act 2010 to have due regard to**

- Eliminate unlawful discrimination
- Advance equality of opportunity
- Foster good relations

	Are there any likely disproportionate impacts on any of the groups below?  Please describe, including stating that you have no data.	Are these negative, neutral or positive? (N, Neu or P)	What action will be taken to address any negative impacts or enhance positive ones?
Race			
Age			

Disability			
Sex			
Religion or belief			
Sexual Orientation			
Gender re-assignment			
Pregnancy & Maternity			
Marriage & Civil Partnership			
Other relevant groups e.g. carers			

**2. What involvement and consultation has been done in relation to this change to/new policy/procedure/strategy or role? What are the results of the consultation?**

**3. What is the actual / likely impact? e.g. Who benefits? Who doesn't benefit and why not? Who should be expected to benefit and why don't they?**

**4. Address the impact:** Summarise whether the proposed change to the new policy/procedure/strategy or role will have a disproportionate impact on any of the protected groups above. Also consider any other policies or procedures that may be impacted and require review. If so this must be brought to the decision maker’s attention and you should fill out the action plan (section 5).

**5. Action Plan**

	Activity	Who	When	Deliverables / Outcomes
1				
2				
3				
4				

**6. Monitoring, Review and Publication**

How will you review the impact and effectiveness of your actions?

Lead Officer Signature:		Review Date:	
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**7. Sign Off**

Academic Director (CEO) or Finance/HR Manager		Date Approved:	
Signature:			

Comments:	
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## 8. Guidance

An EIA is a systematic review that examines whether a proposed or existing policy could create unequal outcomes for particular groups. It is both a risk-assessment tool and a planning tool, helping organisations embed equality considerations into everyday decision-making.

At its core, an EIA asks:

- Who will be affected by this policy or decision?
- Could any group be disadvantaged, excluded, or disproportionately impacted?
- What evidence do we have to support this?
- What changes or mitigations are needed to ensure fairness?

### **Example**

*A college plans to introduce a new attendance policy requiring students to maintain 90% attendance to remain enrolled.*

*It is identified that the following groups are affected: students, teaching staff, student support services*

#### **1. The next step is to gather evidence**

The designated EIA Lead reviews:

- demographic data (e.g., disability, ethnicity, age)
- previous attendance patterns
- complaints or feedback
- known barriers (e.g., transport, caring responsibilities)

#### **2. Then assess potential impacts**

The designated EIA Lead considers each protected characteristic:

- *Disability:* Students with chronic health conditions may find 90% attendance unrealistic.
- *Pregnancy/maternity:* Students may need time off for appointments.
- *Religion/belief:* Students observing religious festivals may miss classes.
- *Age:* Mature students with caring responsibilities may be disproportionately affected.

#### **3. Risks and mitigations must be identified. The assessment identifies risks and proposes adjustments:**

- Allow disability-related absences to be recorded differently.
- Permit authorised absences for medical or maternity appointments.
- Recognise religious observance as authorised absence.
- Provide flexibility for students with caring responsibilities.
- Offer catch-up materials or remote access where appropriate.

#### **4. Decide and record**

The EIA concludes that the policy can proceed only with mitigations. The final record includes:

- the evidence used

- the impacts identified
- the changes made
- who approved the decision

### **5. Monitor after implementation**

After six months, the college reviews:

- attendance data by protected characteristic
- any complaints or appeals
- whether the mitigations are working

If new issues emerge, the policy is adjusted again.