



# **London Academy of Trading**

## **Equality & Diversity Policy**

### **Version 1.3**

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## Equality and Diversity Policy

### 1. Introduction of the policy and its application

The Equality and Diversity policy clearly sets out how the London Academy of Trading (LAT) promotes equality and diversity and create a culture that actively values difference and recognises that people from different backgrounds and experiences can bring valuable insights and enhance the way we operate.

Equality can be described as breaking down barriers, eliminating discrimination and ensuring equal opportunity and access for all groups both in employment, and to goods and services; the basis of which is supported and protected by legislation.

Diversity can be described as celebrating differences and valuing everyone. Each person is an individual with visible and non-visible differences and by respecting this everyone can feel valued for their contributions, which is beneficial not only for the individual but for the library.

Equality and Diversity are not inter-changeable but inter-dependent. There can be no equality of opportunity if difference is not valued and harnessed and taken account of.

-The policy applies to all staff LAT (engaged through, or by, an employment agency and supplied to LAT on a temporary basis), and all job applicants regarding recruitment.

-This applies to all our current enrolled students and all new applicants.

-Staff and students working in or on the premises of other organisations must adhere to the policies and procedures of that organisation.

-The policy also applies to LAT visitors, including, visiting students, visiting lecturers, guest speakers and third-party contractors.

### Our Duty under the Equality Act 2010

LAT is committed to provide supportive working environment for our staff and an excellent teaching and learning experience for our students, where staff are equally valued and respected, and students are encouraged to thrive academically.

When we're making decisions, the **Equality Act 2010** gives us a duty to consider the need to:

- Eliminate discrimination, harassment and victimisation
- Advance equality of opportunity
- Foster good relations between different parts of the community

This covers, age, disability, gender reassignment, marital or civil partnership status, pregnancy and motherhood, race (including ethnic or national origin, colour and nationality), religion or belief (including lack of belief), sex and sexual orientation.

### 2. Organisation & Responsibilities

#### The Managing Director

The Managing Director has the ultimate responsibilities of Equality and Diversity and the following additional responsibilities:



- Champion, sponsor and promote the value of equality and diversity
- Assuring performance judged against Key Performance Indicators
- LAT is ultimately responsible for equality and diversity. He will delegate specific responsibility for areas as follows:

### **Academic Dean, Department and Manager**

Academic Dean, Managers, Line Managers have the following responsibilities

- Responsible for ensuring that staff and students are aware of their responsibilities, understand and apply this policy.
- Responsible for promoting equality and diversity throughout the activities in their area.
- Identify and respond to equality and diversity staff development needs
- Support individual needs of staff so they can participate and perform effectively

### **Teaching Staff**

Staff with responsibility for teaching, support and welfare of students and those who manage others have a responsibility to identify, value and respond appropriately to varying needs and perspectives. In addition, all teaching staff are responsible for:

- Promoting equality and diversity through their teaching programmes and through relations with students, staff and the wider community.
- Ensuring that the curriculum covers the knowledge, skills and values which students need to tackle discrimination when they meet it and to help them to understand and value diversity.
- Ensuring that materials used to deliver the curriculum are accessible to a diverse range of students and adjusted to meet specific needs, and that they are free from sexist, racist and other discriminatory assumptions, images and languages, unless they are being studied as examples of such.

### **Responsibilities of All Staff**

All staff have the above responsibilities and the following additional responsibilities:

- Anticipate and respond positively to different needs and circumstances of members of LAT community
- Apply equality and diversity principles through everyday work activities
- Keep knowledge of LAT equality and diversity policy up to date

Staff who have concerns about unlawful discrimination, harassment or bullying are advised to contact their line manager or a member of GUS HR Team.

### **Responsibilities of All Students**

All students have the following responsibilities:

- Treat all members of LAT community with dignity and respect their rights and beliefs (including within the virtual learning environment)
- Challenge or report incidents of discrimination, harassment and bullying
- Respond positively and inclusively to individual differences

Students who have concerns about unlawful discrimination, harassment or bullying are advised to consult the Student Handbook and contact Academic Dean.

### **3. Introduction to the Disability Discrimination Act**

The Disability Discrimination Act 2005 makes it unlawful to discriminate against a disabled person in relation to employment, or the provision of goods, facilities and services. Following on from the Special Educational Needs and Disability Act 2001 (SENDA - part 4 of the Disability Discrimination Act), LAT has made a formal commitment to opposing discrimination on the grounds of a person's impairments. This policy further incorporates the requirements of the Equality Act 2010 by ensuring that indirect discrimination, including harassments, does not occur for disability.

This includes protection from direct disability discrimination and harassment where this is based person's association with a disabled person, or on a false perception that the person is disabled.

The Equality Act 2010 places a general duty on all Training provider & Higher Education Institutions to promote disability equality. Under these duties LAT is required to:

- eliminate unlawful discrimination
- eliminate harassment of disabled people
- promote equality of opportunities between disabled people and other people
- involve disabled people in the formulation of actions
- promote positive attitudes towards disabled people
- encourage participation by disabled people in public life
- take steps to meet disabled people's needs, even if this requires more favourable treatment
- identify and analyse potential discriminatory policies, practices and procedures in all aspects of the LAT's activities.

#### **Definition of Disability**

The Equality Act 2010 uses a wide definition of disability which includes those with physical or mobility impairments, visual impairments, hearing impairments, dyslexia, dyspraxia, dyscalculia, AD(H)D, medical conditions, mental health difficulties, autistic spectrum conditions, Chronic Fatigue Syndrome, M.E. and 'unseen disabilities' (e.g. asthma, epilepsy, heart conditions, diabetes). The formal definition included in the Act is: "A physical or mental impairment which has a substantial and long-term adverse effect on a person's ability to carry out normal day to day activities"

The definition of "day to day activities" includes mobility, manual dexterity, lifting, hearing, eyesight, speech, memory, and the ability to concentrate, learn or understand. The Act defines "substantial" as being more than trivial and "long-term" as being more than twelve months or likely to last twelve months. An impairment which would substantially affect a person, but which is controlled by medical treatment or prosthesis, is still covered by the definition of disability.

The definition includes cancer, HIV/AIDS and Multiple Sclerosis effectively from the point of diagnosis.

Discrimination and harassment is not limited to those people who are themselves disabled but also applies to those associated with disability i.e. a carer for a disabled child

### **Students with Disabilities**

LAT promotes the increase of access to students with specific learning needs, mental or physical impairments. It encourages applications from students with impairments and specific learning needs and, through its determined commitment, strives to ensure that no suitable candidate is unable to take up a place on one of its courses or is placed at a substantial disadvantage while pursuing that course because of disability or any impairment.

### **Admissions and Support Identification**

All applicants to LAT are considered equally, based upon their academic aptitude. Where an applicant declares an impairment, LAT ensures that any support entitlements are identified at an early stage in advance of a student's confirmation of a place on a course, but this should not involve unreasonable delays in processing such applications. LAT's procedures allow staff then to assess which advice on the amenities and resources available are suitable for the requirements of the student.

LAT has procedures in place, which monitor the potential student applicant and ensure that the student will not be placed at a substantial disadvantage during their period of study; all the while ensuring there is no discrimination against any student. As soon as possible during the admissions process, and on considering all reasonable adjustments possible to ensure that a disabled person would not be at a substantial disadvantage compared to non-disabled people, staff will advise potential students in the unlikely event LAT is unable to facilitate the entitlements of the student.

LAT is committed to guaranteeing that the potential student will gain support as is required, where any barriers occur to their course of study while at LAT's. This will be monitored through a series of assessments, made by the Welfare Officer, prior to the admission process, and a plan of action will be set up to evaluate the entitlements of the potential student.

### **Premises and Access**

LAT acknowledges that the buildings present a problem for different kinds of impairments. LAT seeks to continuously monitor and make improvements to its premises, based on a comprehensive annual premises health and safety, and access audit. This commitment to improved access will continue through adjustments to our general maintenance and improvements. All new buildings and major refurbishment schemes already specifically address the entitlements of students with all types of impairments.

### **Student Support**

The Academy has established an approach which includes detailed assessments that have been devised to allow staff to identify the entitlements of the student, even if the disability or impairment only becomes apparent during their studies. It is through this approach that LAT ensures that the student will feel free and comfortable to converse with LAT to assess and expand upon the assistance

that is required to facilitate their study. This developed support and advisory service will also be available to staff with whom the student will interact.

### **Assessment**

LAT has put into practice a number of practical arrangements for assessing students on the course.

LAT has ascertained certain assessment procedures that ensure that no student is placed at a disadvantage when it comes to examinations and assessments. LAT maintains certain procedures for ensuring that examination officers and assessment boards are made fully aware of the entitlements of any specific student considering the needs of the student.

LAT has undertaken verifications and has an appeal procedure, which does not allow any discrimination of any kind against any student, whether they have a disability or not. These ensure that LAT is as transparent as possible and can be accountable. Allowances are made for students who have disabilities, as long as said students make LAT aware of the entitlements required. Deadlines are followed equally for all students, unless the student in question has extenuating circumstances (such as unforeseen worsening of a condition or related problems); these circumstances must be proven by the support of Medical Certification. The primary focus and purpose is to put personal and general support arrangements in place and make 'realistic adjustments' to the assessment processes (such as additional time in an examination).

Where candidates are in the UK, students will be referred to be needs assessed by authorised and regulated authorities. Any additional support, or other adjustments required of LAT will then be assessed with the view of accommodating the disabled learner. In the case of overseas (non-EU) candidates, LAT will advise of the additional costs required to be met by the learner or their sponsor so LAT may put in place the requirements and entitlements of the learner.

General information from LAT will make clear any difficulties that may arise in the way of mobility access to certain parts of LAT. Where possible, other arrangements that could be made possible to suit the entitlements of the student, will be made in the early stages of admission. This information, along with any special measures or adjustments to be put in place for the student will be notified to the student.

### **Staff with Disabilities**

LAT believes in the value of a diverse workforce, and this includes the representation of staff with disabilities. It, therefore, aims to create an accessible physical environment and an inclusive culture.

It is the aim of LAT to recruit, train, develop and retain disabled people. LAT monitors self-declaration of disability at both application and appointment stage, but it ensures that the recruitment and selection process is fair and does not discriminate people with disability. It is important that the HR have the necessary information and inform the relevant school/department for any adjustment required to the recruitment process.

### **Reasonable Adjustments**

LAT provides reasonable adjustments to ensure that a person with a disability is not at any substantial disadvantage when compared to a non-disabled person.

Reasonable adjustments are changes to the employment arrangements or any physical feature of the workplace and can include:

- making adjustments to premises, fixtures and fittings, furniture and access to equipment
- allocating some of the work to another person
- transferring the employee to another post or another place of work
- being flexible about hours of work and allowing the employee to be away from the office for rehabilitation, assessment or treatment
- providing additional training
- using modified equipment
- making instructions and manuals more accessible
- enabling the use of a reader or interpreter
- making special arrangements for parking and access to buildings

Making special arrangements for Health and Safety or a disabled staff. Arrangements, for example, for the safe evacuation of a disabled person identified at risk from fire. In all cases, members of staff with disabilities that affect their mobility in an emergency will be consulted about their individual needs for evacuating the building in a safe and dignified manner.

### **Discipline**

When taking any disciplinary action against a disabled staff, LAT will fully consider the facts whether there are reasons related to their disability for a disabled staff behaving in the way that has led to the disciplinary action. This is to ensure that there is no discrimination that is just due to disability.

### **Redundancy**

LAT will ensure that in the event of potential redundancies, selection criteria do not discriminate against disabled employees. It will also ensure that any arrangements that are made for consultation do not discriminate against disabled employees.

In all cases LAT will consult with the person concerned about the reasonable accommodation of his or her needs.

## **4. Introduction to Racial Equality**

LAT's is in essence a diverse educational facility, dealing with persons from varying nationalities and racial diversities. LAT is committed in all its functions to promoting race equality, eliminating unlawful discrimination and promoting good race relations between people of different racial groups. LAT values the diversity of its workforce and student population and is working to ensure that the highest equality and diversity standards are maintained.

This policy incorporates the rights and responsibilities listed in the Race Relations Act 1976 and the general and specific duties of the 2000 and 2001 Amendment Acts.

The Race Relations Act 1976, as amended by the Race Relations (Amendment) Act 2000 (RRAA), makes it unlawful to discriminate against anyone on grounds of race, colour, nationality (including citizenship), national or ethnic origin. The amended Act also imposes general and specific duties on specified public authorities to eliminate unlawful racial discrimination and take positive steps to promote racial equality

and mutual respect. The definition of public authority under the Act is 'anybody certain of whose functions are of a public nature'. LAT is a public body under the terms of the Act.

### **LAT and the Act**

The RRAA arose out of the recommendations of the 'Report of the Stephen Lawrence Inquiry' and provides an opportunity for public bodies to undertake a review of policies and processes relating to staff and students in the context of racial equality. LAT community will work within the framework provided to eliminate any institutional racism.

LAT ensures that racial equality is a matter of which those who carry out its functions at every level are fully aware. The functions of LAT to which this Policy is particularly relevant include the following

- Student admissions, access to courses, assessments and academic progress.
- Student guidance, career advice, support, accommodation, catering and recreational activities
- Curriculum design, teaching, learning and delivery.
- Provision of and access to support services.
- Staff recruitment, selection, induction.
- Staff development, professional training, promotion, career progression; disciplinary, grievance and exit procedures.
- Procurement and outsourcing; quality assurance.

### **Harassment and Bullying**

LAT's approach to harassment is that everyone should be treated with dignity and respect at work and while studying. LAT policy extends beyond the purely legal requirements; no form of harassment of individuals, whether prohibited by law or not, will be tolerated. An individual must not pursue a course of conduct that amounts to harassment of another, and that s/he knows, or ought to know, amounts to harassment of the other.

#### **Definition of Harassment**

Harassment is behaviour resulting in diminution of self-esteem and the undermining of a person's well-being. It may, for example, adversely affect his/her health, work performance or threaten or appear to threaten job security or prospects. It may be persistent behaviour or an isolated incident. In relation to gender, disability, sexuality, race, or ethnic and national origins, harassment is defined as occurring when unwanted conduct, based on the relevant grounds, has the purpose or effect of violating someone's dignity or creating an environment that is intimidating, hostile, degrading, humiliating or offensive to someone.

#### **Definition of Bullying**

The dictionary definition of a bully is a person who frightens or persecutes weaker people. It can for that reason be the act of intentional causing of harm to others through verbal harassment, physical assault, or other more subtle methods of coercion, such as manipulation. Bullying can occur in any environment where individuals interact with each other. It is far more common than sexual harassment and verbal

abuse. Workplace bullying often takes place within the established rules and policies of the organisation and society. Such actions are not necessarily illegal and may not even be against the firm's regulations; however, the damage to the targeted employee and to workplace morale is obvious. Intimidation, victimisation or any other form of retaliation against those who have been involved in making or assisting in a complaint of harassment are not acceptable. This may lead to further action, which could include pursuing disciplinary procedures, civil action or criminal investigation.

### **Gender Recognition**

LAT is considered in essence to be a diverse educational facility, dealing with transsexual individuals. LAT is committed in all its functions to promoting gender equality, eliminating unlawful discrimination and promoting good relations between peoples of different genders. LAT values the diversity of its workforce and student population and is continually working to ensure that the highest equality and diversity standards are maintained.

This policy encompasses the rights and responsibilities of any staff member or student who has fully transitioned or is in the process of transition to the opposite gender, as identified and laid down in the Gender Recognition Act (2004).

LAT ensures that the Gender Recognitions a matter of which those who carry out its functions at every level are fully aware. The functions of LAT to which this Policy is particularly relevant include the following

- Student admissions, access to courses, assessments and academic progress.
- Student guidance, careers advice, support, accommodation, catering and recreational activities
- Curriculum design, teaching, learning and delivery
- Provision of and access to support services
- Staff recruitment, selection, induction
- Staff development, professional training, promotion, career progression; disciplinary, grievance and exit procedures
- Procurement and outsourcing; quality assurance

### **Sexual Orientation Equality**

LAT is committed in all its functions to promoting sexual orientation equality, eliminating unlawful discrimination and promoting good relations between people of all sexual orientations: gay, lesbian, heterosexual and bisexual. LAT values the diversity of its workforce and student population and is working to ensure that the highest equality and diversity standards are maintained.

The Equality Act 2010 protects individuals from discrimination on grounds of sexual orientation, in the provision of services, education and management of premises. The protection will therefore apply to everyone, whether the individuals are lesbians, gay men, heterosexual or bisexual.

The regulations prohibit direct discrimination: this is when a person treats another person less favourably on the grounds of his/her sexual orientation, or what is believed to be his/her sexual orientation, or the sexual orientation/perceived sexual orientation of another person with whom they associate.

LAT is aware that it is unlawful to discriminate against a prospective student in the terms by which it offers to admit or by refusing to accept an application to admit them as a student. It is also conscious that it is unlawful to publish, or to cause to be published, an advertisement which indicates an intention by any person to discriminate unlawfully. The functions of LAT to which this policy is particularly relevant include the following:

- Student admissions, access to course, assessment and academic progress
- Student guidance, career advice, support, accommodation, catering and recreational activities
- Provision of and access to support services, staff recruitment, selection, induction, staff development, professional training, promotion, career progression, disciplinary, grievance and exit procedures
- Quality Assurance

### Religion & Belief

The Equality Policy provides for an inclusive environment, which 'promotes equality, values diversity and maintains a working, learning and social environment in which the rights and dignity of all its staff and students are respected.' It also provides that no student or member of staff will be treated less favourably on grounds which include religion and belief.

The **Equality Act 2010** provides protection against discrimination, harassment and victimisation on the grounds of religion or belief. The definitions of religion and belief under the Equality Act 2010 are:

- **religion** - any religion or reference to religion, including a reference to a lack of religion
- **belief** - any religious or philosophical belief or reference to belief, including a reference to a lack of belief

Religion or belief should be taken to mean the full diversity of religious and belief affiliations within the UK, including non-religious and philosophical beliefs such as atheism, agnosticism and humanism.

### Age

In the Equality Act 2010, age is one of the 'protected characteristics' on the grounds of which people are protected against unfair discrimination. The Equality Act 2010 makes it unlawful to discriminate against employees, job seekers and trainees because of age. For example, this may include because they are 'younger' or 'older' than a relevant and comparable employee. All members of LAT are encouraged to be alert to possible unconscious bias, and to make decisions about people against clear criteria.

There are four main types of age discrimination.

#### Direct discrimination

Breaks down into three different sorts of direct discrimination of treating someone 'less favourably' because of:

- their actual age (direct discrimination)
- their perceived age (direct discrimination by perception)
- the age of someone with whom they associate (direct discrimination by association).

Direct discrimination because of someone's actual age is the only one of the three different sorts of direct discrimination that may be objectively justified as what the law terms 'a proportionate means of achieving a legitimate aim'. This means it must be proportionate, appropriate and necessary (economic factors such as business needs and efficiency may be legitimate aims).

### **Indirect discrimination**

This can occur where there is a policy, practice, procedure or workplace rule which applies to all workers, but particularly disadvantages people of a particular age. For example, a requirement for job applicants to have worked in a particular industry for ten years may disadvantage younger people. In some limited circumstances, indirect discrimination may be justified if it is 'a proportionate means of achieving a legitimate aim'.

### **Harassment**

When unwanted conduct related to age has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual.

### **Victimisation**

Unfair treatment of students or staff who have made or supported a complaint about age discrimination.

LAT is aware that it is unlawful to discriminate against the prospective student and staff and it promotes applications for all ages (Please note that students are subject to minimum age requirements depending on their chosen courses. It is also conscious that it is unlawful to publish, or to cause to be published, an advertisement which indicates an intention by any person to discriminate unlawfully. The functions of LAT to which this policy is particularly relevant include the following:

- Student admissions, access to course, assessment and academic progress
- Student guidance, career advice, support, accommodation, catering and recreational activities
- Provision of and access to support services, staff recruitment, selection, induction, staff development, professional training, promotion, career progression, disciplinary, grievance and exit procedures
- Quality Assurance

Staff of all ages are encouraged to discuss their future plans and choices. There may be periods in their lives when they need support, when they have caring responsibilities for children or elderly family members, or towards the end of an extended working life. We encourage all staff to discuss their future plans and choices with their manager and to identify any development needs. Within LAT there may be opportunities for options such as part-time work, career breaks, and sideways moves to develop new skills or flexible retirement. LAT offers a formal flexible working scheme to parents and carers, but other people are encouraged to make informal enquiries about flexible working.

### **Monitoring**

LAT will publish data on Equality and Diversity for both staff and students as required by the legislation. LAT aspires to be in a position to monitor and analyse performance on the basis of the monitoring of

Equality and Diversity for staff and students. All data, which will be anonymous to maintain confidentiality, will be subject to the requirements of the Data Protection Act and must be current, credible and accurate. LAT decides what information we publish and we are focusing on the four equality strands of Gender, Race, Age and Disability.

The results of all equalities monitoring data will be reported to LAT Academic and Planning Committee.

### **Staff Training & Development**

All students and staff joining LAT will have access to the Student/Staff handbook and they will be given information in their relevant induction programmes.

### **Disclosure and Confidentiality**

It is LAT's normal policy to respect the privacy of the student and staff while ensuring that those who have regular contact with the student will be informed of their specific support needs on a 'need to know' basis. Should the student and staff have need of a greater degree of privacy than that, this will be respected. The student will be made aware that this increased level of privacy may interfere with the staff's effective delivery of the student's explicit support needs.

### **Non-Compliance, Complaints and Support**

Where a student alleges non-compliance with the policy, he or she may lodge a complaint through the Academic Dean; alternatively, recourse may be made to the Grievance Procedure and students may use the Student Complaints Procedure. In case of a member of staff alleges non-compliance with the policy, he or she may lodge a complaint through their respective line managers; alternatively, recourse may be made to the Grievance Procedure outlined in Staff Handbook.

Members of the public can make written complaints to LAT directly in cases where they believe that they have not been treated by LAT according to the requirements of this policy.



**Version Control Table**

Version	1.0	Name	Role	Date
Created by:		Abeera Khan	QA Projects Manager	Jan '17
		<i>Original draft version</i>		
Approved by:				
Version	1.1	Name	Role	Date
Amended by:		Dessy Ohanians	CEO	Jul '18
Changes approved by:		<i>Paddy Osborn, Academic Dean</i>		Jul 2018
Version	1.2	Name	Role	Date
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Amended by:		Paddy Osborn	MD & Academic Dean	Oct '24
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