



Equity, Diversity and Inclusion Policy

September 2026

Equity, Diversity and Inclusion policy

1. Overview

Who we are

City Lit is an open-hearted, ambitious and inclusive community of staff and students. We believe in the potential of every individual. We champion dignity, belonging and equity of opportunity, and we take responsibility for dismantling barriers — both visible and invisible — that could prevent people from thriving.

Our commitments

- We eliminate discrimination, advance equity, and foster good relations.
- We design accessible, inclusive learning.
- We challenge and take action against all forms of discrimination, harassment, bullying and victimisation.
- We act on data, evidence and lived experience.
- We create a culture where people are treated with dignity, are valued, listened to, and able to participate fully and safely.

Everyone's responsibility

- Leaders lead with integrity.
- Staff apply inclusive practice.
- Students uphold respectful behaviours.

2. Purpose and ambition

This policy sets out how City Lit commits to being an exceptional place to learn and work, where equity, diversity and inclusion are lived values across culture, governance, teaching, and community engagement. Our commitment to equity, diversity and inclusion is both a legal and moral responsibility. We do not accept discrimination and take our duties under the Equality Act 2010 seriously, acting to remove barriers, advance equity and foster respectful, inclusive learning and working environments.

Our ambition is to ensure our approach goes beyond compliance to an organisational culture where inclusion is firmly understood and embedded across the college.

3. Scope

This policy applies to all students, staff, governors, volunteers, contractors, partners and visitors, and covers all City Lit systems, services and activities.

As a public body, City Lit will:

- Comply with the Public Sector Equality Duty (s.149).
- Publish equality objectives at least every four years.
- Publish annual information demonstrating compliance (including workforce and student data, and relevant pay gap reporting).

4. Our approach and definitions

This section sets out the core principles and shared definitions that inform City Lit's approach to equity, diversity and inclusion. These definitions provide a common understanding across the organisation, grounding our legal duties under the Equality Act 2010 and Public Sector Equality Duty in lived practice. They guide how we design learning and services, make decisions, assess impact, and treat one another with dignity and respect. Together, they support consistent, transparent and accountable action across all areas of the college.

4.1 Protected characteristics under the Equality Act – Age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation.

4.2 Social model of disability — we remove organisational, attitudinal, environmental and digital barriers.

4.3 Anti-racism — we act to dismantle structural, institutional and interpersonal racism.

4.4 Intersectionality — we recognise people can be disadvantaged by multiple, interlocking inequalities (e.g., race + disability + gender + socio-economic background).

We:

- Analyse data intersectionally.
- Reflect intersectional risks in relevant equality impact assessments.
- Tailor support to complex identities and experiences.

4.5 Inclusion, dignity and respect — lived daily in how we deliver learning, interact and work with one another.

5. Anti-racism

City Lit is committed to being an explicitly anti-racist organisation. This means:

- Recognising systemic racism and its impacts on learning, wellbeing and opportunity.
- Acting intentionally to challenge bias, racism and inequity.

- Embedding understanding of racial literacy across leadership, curriculum and culture.
- Analysing outcomes for Black and Global Majority students and staff, using intersectional approaches, and co-designing improvement interventions.
- Setting measurable goals, assigning ownership, and communicating progress.
- Improving representation in teaching, leadership and governance.
- Providing trauma-aware support for those affected by racism and focusing on learning and prevention after incidents.
- Ensuring equality impact assessments identify racialised harms.
- Responding transparently and proportionately to incidents.
- Partnering with organisations advancing race equity.

This includes explicitly challenging antisemitism, Islamophobia and other forms of religiously motivated and racialised hatred. City Lit recognises that these forms of discrimination have distinct histories, stereotypes and modes of expression, and that they may intersect with other protected characteristics or lived experiences. Such harms can undermine safety, dignity, participation and trust. We are committed to building staff and student confidence to recognise, prevent and respond to these issues appropriately, to supporting those affected, and to addressing incidents transparently and proportionately in line with our legal duties, safeguarding responsibilities and commitment to equity.

6. Policy pillars

These policy pillars set out how equity, diversity and inclusion are embedded across leadership, practice and systems at City Lit, supporting consistent, accountable and inclusive ways of working.

6.1 Leadership and accountability

Leaders will:

- Model inclusive and anti-racist leadership.
- Listen with humility and curiosity.
- Apply EDI in team meetings, 1:1s, planning and decision-making.
- Sponsor—not delegate—EDI work.
- Challenge discriminatory behaviour.
- Recognise the need to resource EDI properly.

6.2 Accessibility and reasonable adjustments

Accessible estates, learning, services, digital platforms and communication.

6.3 Inclusive curriculum, teaching and assessment

- Diverse, representative curriculum.

- Inclusive pedagogy.
- Fair and accessible assessment.

6.4 Student experience and voice

Visible routes to speak up, inclusive induction, dignity-based student culture.

6.5 Workforce experience

Fair recruitment, development, inclusion and support.

6.6 Data, transparency and improvement

Data-driven action, evidence-informed EDI objectives, annual reporting, and a regular EDI staff survey that informs City Lit's EDI priorities. This includes, for example: student participation and achievement gaps; progression and retention; complaints and safeguarding themes; workforce recruitment, progression and pay gaps; and completion of mandatory training.

6.7 Partnerships and community

Working externally to widen participation, broaden understanding and eliminate barriers.

7. Operational standards

7.1 Equality Impact Assessments (EIA's)

Equality Impact Assessments are not a legal requirement on their own, but they are a widely used way for public bodies to show that they have given proper consideration to the Public Sector Equality Duty.

At City Lit, EIAs help us think through the potential impact of decisions, reduce the risk of direct or indirect discrimination, and record how equality has been considered. They are used for new or significantly changed policies, major curriculum or service changes, and organisational restructures. The proposal owner is responsible for completing the EIA, with support from the EDI lead, and the findings are used to shape decisions, mitigations and ongoing monitoring.

7.2 Reasonable adjustments and special considerations

City Lit is committed to anticipating and responding to individual needs so that everyone can participate fully and equitably in learning and working life. Reasonable adjustments and special considerations are a routine part of inclusive practice and are used to remove barriers, promote fairness and support positive experiences and outcomes for students and staff.

7.3 Admissions, recruitment and outreach

City Lit is committed to fair, open and inclusive admissions, recruitment and outreach practices that remove barriers and widen participation. Our processes are designed to support access, promote equity of opportunity and ensure that decisions are made transparently, consistently and without discrimination.

7.4 Induction, conduct and reporting

City Lit sets clear expectations for behaviour from the outset and supports a culture where everyone feels safe, respected and able to raise concerns. Through inclusive induction, clear standards of conduct and trusted reporting routes, we promote accountability, prevent harm and ensure that issues are addressed fairly, proportionately and with care.

7.5 Inclusive quality assurance

Inclusive practice is embedded within City Lit's quality assurance processes to ensure that equity, accessibility and fairness are reflected consistently in teaching, learning and assessment. Through class visits, moderation and RARPA, we use quality assurance to identify barriers, support improvement and promote positive, inclusive experiences and outcomes for all students.

7.6 Accessible communications and digital content

City Lit is committed to ensuring that all communications and digital content are accessible, inclusive and easy to understand. By using plain English and inclusive design principles, we remove barriers to information, support participation and ensure that staff and students can engage fully and confidently with our learning, services and communications.

- Plain English
- Web Content Accessibility Guidelines (WCAG) aligned content on City Lit's website
- Captions, transcripts or BSL interpretation for videos
- Clear and inclusive language
- Representation in imagery

8. Microaggressions and everyday inclusion

Microaggressions are subtle comments, actions or behaviours that cause harm, create exclusion or diminish someone's identity. City Lit:

- Defines microaggressions clearly in training and guidance.
- Equips staff to interrupt microaggressions safely.

- Encourages active bystanders to speak up.
- Provides support for those affected.
- Embeds these principles in tutor practice, staff training and feedback.

Examples include:

- Repeatedly mispronouncing a staff member's or student's name.
- Assuming competence or lack of competence based on identity.
- Stereotyping comments.
- Dismissing lived experiences.

9. Tutor expectations for inclusive teaching

Tutors will:

- Use inclusive lesson planning.
- Make learning accessible.
- Anticipate student differences.
- Create respectful classroom agreements.
- Promote participation for all.
- Represent diverse cultures and perspectives.
- Manage difficult conversations constructively.
- Challenge discriminatory behaviour.
- Provide equitable feedback and support.
- Make adjustments when required.
- Promote duty of care and a safe learning environment.

10. The student journey with EDI

Equity, diversity and inclusion are embedded at every stage of the learner journey at City Lit, from first enquiry through learning, assessment and progression. By anticipating barriers, setting clear expectations and providing appropriate support at each stage, we aim to ensure fair access, positive experiences and equitable outcomes for all learners.

10.1 Pre-entry

- Accessible information, advice and guidance
- Fair admissions and screening

10.2 Induction

- Values, rights, responsibilities
- Ground rules and class contracts

- Adjustments confirmed

10.3 Learning

- Inclusive teaching and classroom culture
- Support for wellbeing and safety

10.4 Assessment

- Accessible, fair, bias-aware
- Clear adjustments or special considerations

10.5 Progression

- Supported referrals, information, guidance, and next steps

11. Roles and responsibilities

At City Lit, equity, diversity and inclusion are integral to who we are and how we work together. Responsibility for EDI is shared across the whole college community - staff, students, leaders and partners - and is reflected in everyday behaviour, decision-making and practice. Everyone is expected to follow the EDI policy, treat others with dignity and respect, avoid discrimination, harassment and bullying; challenge and/or report unacceptable behaviour. Clear roles support accountability, but inclusion is built collectively through our culture.

11.1 Governing Body - Holds the Executive to account for outcomes and compliance; approves this policy and EDI objectives; receives an EDI Annual Report, and updates on reporting and risk; assures legal compliance with equality duties.

11.2 Governance and People Committee - Scrutinises workforce EDI, recruitment, learning and development and culture.

11.3 Quality Committee - Monitors inclusion in curriculum, teaching and learning, identification of students' barriers to learning and progress, student outcomes, RARPA and assessment practice, student voice; triangulates teaching and learning practice, surveys and achievement gaps.

11.4 Principal and Executive Team - Sponsor EDI, allocate resources, agree priorities, embed EDI into strategy, risk and quality; oversee EIAs for major decisions if relevant and track actions to completion.

11.5 Vice Principal (EDI Lead) - Policy owner; chairs the EDI Strategic Group; reports to Executive, Governing Body and Committees; supports the EDI operational lead and oversees EDI annual reporting.

11.6 Director of Learning and Inclusion - Operational lead; coordinates the EDI action plan and objectives; chairs the EDI Teaching and Learning Group; prepares the EDI

Annual Report and builds staff capability through training, toolkits, and support through campaigns.

11.7 Designated Safeguarding Lead (DSL) and DDSL - Ensure safe reporting routes, case management and staff training; provide safeguarding insights to inform EDI objectives.

11.8 EDI Strategic Group, EDI Teaching and Learning Group, and Student Panel - Represent staff and students; surface barriers and solutions; share good practice; co-design actions and review progress.

11.9 Managers and Heads - Model inclusive leadership; identify and drive departmental EDI priorities; ensure team engagement; use data to identify and close gaps; build inclusive practice into day-to-day operations; act promptly, proportionately and consistently to address student or staff reports of discrimination, harassment or victimisation.

11.10 Tutors, Trainers and Assessors - Foster equitable learning by using inclusive pedagogy and accessible materials; create respectful learning environments by agreeing appropriate ground rules; address unacceptable behaviour; implement reasonable adjustments; report concerns.

11.11 Professional Services (Enrolment, MIS, Exams, Student Services, Estates, IT, Marketing and Comms, Finance) - Deliver services that are equitable and accessible, design barrier-free processes, forms and systems; meet accessibility standards; and provide data and evidence for monitoring and reporting.

11.12 HR - Run fair and transparent recruitment and progression processes; support Dignity at Work; deliver appropriate EDI training for staff; support reasonable adjustments for staff and accessible working practice; monitor workforce diversity and pay gaps; support equality reporting.

12. Governance, monitoring and publication

12.1 Governance structure - EDI is governed through the Governing Body (policy, EDI objectives, PSED compliance), Governance and People Committee (workforce and culture), Quality Committee (safeguarding, quality, student experience, student outcomes).

12.2 Monitoring and dashboards - Dashboards include participation and achievement by characteristic; behaviour and complaints themes; safeguarding trends; staff diversity, recruitment and progression; training uptake; accessibility audits. Data is anonymised, aggregated and reported with due regard to privacy.

12.3 Publications - City Lit will publish: EDI Objectives with baselines and measures; an EDI Annual Report aligned to our PSED obligations summarising workforce and

student data, progress and priorities; and accessibility statements and updates where relevant.

12.4 Quality cycle - EDI is embedded into the SAR and quality cycle; actions are tracked with owners, objectives and impact measures; findings inform curriculum planning, CPL and resource allocation.

12.5 Risk and assurance - Key EDI risks are included in the college risk register; controls and assurances are reviewed routinely. Evidence is maintained for Ofsted inspection and funding assurance.

12.6 Record-keeping - Training logs, safeguarding case records, complaints data, recruitment and workforce reports, accessibility audits and meeting minutes are retained per policy and GDPR requirements.

13. If something goes wrong: breaches of this policy

City Lit expects all staff and students to work within both the letter and the spirit of this policy and to support its aims in everyday behaviour and practice. Equity, dignity and respect are core expectations of everyone in the college community.

13.1 Breaches of this policy

Any member of staff or student who acts in an offensive, discriminatory or exclusionary manner, or otherwise behaves in a way that is inconsistent with this policy, may be subject to action under the appropriate staff or student disciplinary, conduct or complaints procedures.

13.2 Raising concerns

If you experience, observe or become aware of behaviour that may breach this policy, you are encouraged to raise it as early as possible. Concerns can be reported confidentially to:

- A line manager, tutor or duty manager
- HR (for staff-related concerns)
- Safeguarding (where there are wellbeing or safety risks)
- The Feedback and Complaints route (for students).

13.3 How concerns are handled

All concerns are taken seriously. You will be listened to, supported and treated with dignity. Reports are handled:

- Confidentially and sensitively
- Proportionately, based on the nature and risk of the concern

- In line with the relevant procedure (e.g. safeguarding, conduct, disciplinary or complaints).

13.4 Outcomes and learning

Where concerns are upheld, appropriate action will be taken. Learning from incidents is used to inform quality improvement, training and prevention activity, with safeguards in place to protect those affected.

14. Legal and regulatory alignment

City Lit's approach to equity, diversity and inclusion is grounded in our legal responsibilities as a public body. We uphold the protections set out in the Equality Act 2010 and use these statutory definitions to inform our policies, decision-making, behaviours and responses to harm, ensuring consistency, fairness and accountability across the college.

City Lit upholds the protections set out in the Equality Act 2010, including:

- Direct and indirect discrimination
- Harassment and sexual harassment
- Victimisation
- Reasonable adjustments for disabled people
- Intersectionality and dual discrimination.

This policy sits alongside, and should be read in conjunction with, City Lit's wider staff and student policies and procedural frameworks, including safeguarding, health and safety, whistleblowing and conduct arrangements. These policies and procedures provide the formal routes for reporting, investigation, decision-making and action where issues relating to equity, discrimination, harassment or victimisation arise.

15. Behaviours

Our commitment to equity, diversity and inclusion is lived through everyday behaviour. The expectations set out below describe how staff and students are expected to act, interact and respond to one another, and how we address harm when it occurs. These behaviours support a culture of dignity, safety, accountability and learning, and make clear what is and is not acceptable across the college community.

We will:

- Create a culture where people are treated with dignity, are valued, listened to, and able to participate fully and safely.
- Speak up and challenge discrimination, harassment, racism and ableism, including microaggressions.
- Listen with curiosity and humility; apologise and learn when we get it wrong.
- Use inclusive language and design accessible learning and services.
- Co-create respectful ground rules and uphold them consistently.
- Implement reasonable adjustments promptly and sensitively.
- Use reporting routes and support those affected by harm. Respect confidentiality by adhering to GDPR and privacy legislation.

We will not:

- Ignore concerns or tolerate discriminatory behaviour (including 'banter' and other forms of microaggression that harm).
- Rely on colleagues or students from minoritised groups to lead EDI or educate others.
- Share confidential information inappropriately.

When harm occurs:

- We act early, proportionately and in a trauma-aware way. We focus on dignity, safety and learning; communicate outcomes appropriately and use lessons from incidents to support improvement.

Appendix A - Compliance Mapping

Duty/Standard	What it requires	How City Lit complies	Evidence	Owner	Review
Equality Act 2010 (incl. PSED s.149)	Eliminate discrimination; advance equality of opportunity; foster good relations	EDI Policy; EDI Annual Report; published EDI objectives	EDI annual report; EDI Action Plan; committee minutes	VP EDI	Annual objectives
Ofsted REIF / FE and Skills	Inclusive Curriculum, Teaching and Training; Achievement; Leadership and Governance; Participation and Development	Inclusive curriculum and assessment; induction and conduct; student voice; staff CPL; class visits and moderation; safeguarding	Class visit reports; RARPA moderation; CPL logs; student and staff surveys; SAR/QIP	Director of Learning and Inclusion; DSL	Termly or Annual
Funding – GLA; DfE/ESFA	Funding compliance; equitable access; data and assurance	Eligibility and IAG; equitable recruitment; performance monitoring; audit evidence	MIS reports; audit files; policy library	Funding and MIS	In-year + annual
Prevent Duty	Leadership; risk assessment; staff training; referral pathways	Prevent risk assessment; training; clear routes to refer; partnership with external agencies	Prevent risk assessment; training logs; case records	DSL/DDSL	Annual
Ofqual and awarding body rules	Reasonable adjustments, special considerations maintain assessment integrity	Exams access arrangements; documented decisions and quality checks	Awarding body approvals; assessment evidence	Exams Manager Curriculum Heads	Annual
UK GDPR/Data Protection Act	Lawful, fair and transparent processing; data minimisation; rights	Privacy notices; DPIAs; retention schedules; secure handling	DPO logs; privacy notices; SAR/FOI responses	DPO	Annual

Appendix B — Glossary

Active bystander, or upstander: - A person who takes safe and proportionate action in response to harm, including supporting those affected and/or reporting or escalating concerns through appropriate channels.

EDI – Equity, Diversity and Inclusion.

PSED – Public Sector Equality Duty (Equality Act 2010, s.149).

EIA – Equality Impact Assessment: a structured assessment of how a decision or policy might affect people with different protected characteristics and others.

Protected characteristics – Age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation.

Reasonable adjustment – A change that removes or reduces a barrier for a disabled person so they can access learning or work fairly.

Special consideration – An adjustment to assessment outcomes to reflect temporary illness, injury or exceptional circumstances at the time of assessment (per awarding-body rules).

RARPA – Recognising and Recording Progress and Achievement (for non-accredited learning).

DSL/DDSL – Designated Safeguarding Lead/Deputy Designated Safeguarding Lead.

DPO – Data Protection Officer.

DPIA – Data Protection Impact Assessment.

WCAG – Web Content Accessibility Guidelines (digital accessibility standard).

Microaggression – Everyday comment/action that communicates bias or exclusion, often unintentional, with cumulative harm.

Trauma-aware practice – Approaches that recognise the impact of trauma and avoid re-traumatisation.

SAR/QIP – Self-Assessment Report / Quality Improvement Plan.

Executive Owner	Vice Principal
Policy Owner	Director of Learning and Inclusion
Approval Body	Governing Body
Date Approved	07/07/2026
Review Period	Every three years unless legislative changes need to be reflected
Next Scheduled Review Date	Three years from date approved Change control – Material changes to scope or legal alignment require committee approval; minor clarifications are recorded in version control and communicated via staff channels.

Version tracking

Versions	Date	Author	Reason for changes
V1	12/5/2026	Wendy McKaig / Dragana Ramsden	Substantially updated from 2019 EDI Policy

Classification

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