



Document Details			
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V1	November 2025	Policy has now come under the responsibility of the Group Director of People Updated language and amended for readability Incorporated amendments as agreed at F&R on 25 June 2025

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1. Definition of Terms

- 1.1. Anti-Racism encompasses a range of ideas and political actions which are meant to counter racial prejudice, systemic racism, and the oppression of specific racial groups. Anti-racism is usually structured around conscious efforts and deliberate actions which are intended to create equal opportunities for all people on both an individual and a systemic level.
- 1.2. Conscious Inclusion refers to the deliberate and proactive effort to ensure all individuals, regardless of their background, identity, or circumstances, feel respected, valued, and included within the college community. It involves actively recognising and addressing bias, removing barriers to participation, and creating equitable opportunities for everyone. Conscious inclusion goes beyond compliance, it is about embedding inclusive practices into everyday decision-making, behaviours, and institutional culture.
- 1.3. Discrimination is defined as an act which has the effect of treating a person less favourably because of factors related to their personal characteristics such as disability or sexual orientation. There are different types of discrimination. Further information can be found from the [Equality and Human Rights Commission](#).
- 1.4. Diversity encompasses all forms of difference in individuals even if they are not covered by legislative acts, such as height and weight.
- 1.5. Harassment is unwanted conduct which may create the effect (intentionally or unintentionally) of affecting an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment which interferes with an individual's learning or working environment. Harassment may be persistent or an isolated incident and may be by an individual against an individual or involve groups of people.

In line with the Worker Protection (Amendment of Equality Act 2010) Act 2023, MidKent College is committed to providing comprehensive training to prevent harassment and bullying in the workplace, ensuring a safe and respectful environment for everyone.

- 1.6. Stereotyping is defined as a standardised view that one person or group of people holds in common about another person or group of people and can be either positive or negative.
- 1.7. Positive action is the deliberate introduction of measures to eliminate or reduce discrimination, or its effects. It is not about special treatment for any one particular group, but the fair treatment of all people. It is distinct from positive discrimination which is unlawful.
- 1.8. Unconscious bias refers to a bias that we are unaware of, and which happens outside of our control. It is a positive or negative bias that happens automatically and is triggered by our brain making quick judgements and

assessments of people and situations, influenced by our background, culture and environment and personal experiences. We aim to be aware of our own conscious and unconscious biases, prejudices and stereotypes, and to mitigate the effect of unconscious or implicit bias on our decision-making.

- 1.9. In this section, 'college community' includes all members of staff and students, Governors, visitors, contractors, service providers, applicants for jobs and courses, work placement providers, employers of students on apprenticeships and any other persons associated with the functions of the College.

2. Introduction

- 2.1. MidKent College believes firmly that equality, diversity and inclusion are essential factors which contribute to the academic and economic strengths of the College and the wellbeing of all those within the college community. This policy deals with the promotion of equality of opportunity for all at MidKent College in accordance with the Equality Act 2010.
- 2.2. MidKent College will treat all members and potential members of the college community with respect and dignity and seek to provide a safe and positive environment, free from all discrimination, harassment or victimisation.
- 2.3. The College is committed to providing a learning and working environment that values all forms of diversity. By embracing the diversity of our local community, we aim to not only meet, but exceed in our obligations under current and future equality legislation, through a culture of conscious inclusion.

3. Scope and Aim of the Policy

- 3.1. This policy relates to equality, diversity and inclusion of opportunity, and applies to all members of staff and students, Governors, visitors, contractors, service providers, applicants for jobs and courses, work placement providers, employers of students on apprenticeships and any other persons associated with the functions of the College. This policy covers all sites on which the College carries out its activities.
- 3.2. The Equality, Diversity and Inclusion Policy forms an integral part of MidKent College's Diversity and Inclusion Strategy and should be read together with other relevant MidKent College policies, in particular:
 - Equal Opportunities Policy
 - Whistleblowing Policy
 - Wellbeing & Mental Health Policy,
 - Prevent Policy
 - Teaching, Learning and Assessment Policy
 - Admissions Policy
 - Anti-Harassment & Anti-Bullying Policy
 - Safeguarding Policy.

- 3.3. MidKent College strives to be an inclusive organisation, which means we actively target, challenge and remove systemic barriers that enable discrimination of any form, recognising this as a corporate responsibility. For us, commitment, understanding and action to eliminate discrimination and reduce health inequalities really matters.
- 3.4. The purpose of this policy is to demonstrate the College's commitment to upholding and valuing the principles of diversity, inclusion, fair treatment and equality of opportunity. MidKent College unequivocally opposes discrimination in all its forms and is committed to preventing acts of exclusion and unfair treatment as defined by legislation and College policy and is working towards a culture of conscious inclusion.
- 3.5. MidKent College also recognises its legal responsibility to the Public Sector Equality Duty (PSED) to ensure that in carrying out its activities, the College will have due regard to:
- Fostering good relations between different people
 - Advancing equality of opportunity
 - Eliminating discrimination.

4. General Terms

- 4.1. It is the policy of MidKent College that individuals are not treated less favourably on the grounds of:
- race (including ethnic or national origin)
 - gender
 - disability
 - age
 - sexual orientation
 - religion or belief
 - gender reassignment
 - marital or civil partnership status
 - pregnancy, maternity or paternity
 - socio-economic status
 - any other factor.

All staff have a duty to contribute constructively to equality, diversity and inclusion.

- 4.2. MidKent College seeks to create a culture of conscious inclusion, in which issues of stereotyping and discrimination can be discussed openly with a shared commitment to challenging prejudice. We aim to become an institution that empowers the disadvantaged through promoting good relations between members of all groups and having a student and staff demographic representative of our local community. To this end, MidKent College have been accredited by the National Centre for Diversity and hold 'Investors in Diversity' (iD) Silver status (awarded in April 2025). This independent biennial audit ensures MidKent College's commitment toward advancing equality, diversity and inclusion within our operations. The iD quality mark is awarded to

institutions that can demonstrate an all-encompassing approach to managing equality, diversity and inclusion, effectively embedding equality and diversity at the heart of what they do.

- 4.3. Equality, diversity and inclusion are integral to the day to day running of the College and to the formulation of policy and strategy. An Equality, Diversity and Inclusion Policy cannot succeed without the active support of the entire College community and must be the priority and responsibility of the Senior Leadership Teams.
- 4.4. In order to fulfil our PSED and assess our progress, the College publishes an annual equality, diversity and inclusion reviews on our website which includes data on protected characteristics, and undertakes Equality Impact Assessments and monitoring.

5. Our Commitment

5.1. Race

5.1.1. At MidKent College, we stand firmly against racism in all its forms. Our mission is to cultivate an environment where every individual is respected, valued, and included, regardless of race, ethnicity, or background. As an anti-racist college, we are committed to the following principles:

- **Education and Awareness:**
We pledge to continuously educate our students, faculty, and staff about the history and impact of racism. This includes: regular mandatory anti-racist training and integrating anti-racist principles into our curriculum ensuring everyone is up-to-date with the latest information and practices; embedding anti-racist principles into the curriculum in a way that they are consistently taught and reinforced throughout various courses and programs; facilitating continuous dialogue and workshops to keep the conversation about racism and its impact active and evolving; and regularly reviewing and updating the educational materials and training programs to reflect new insights, research, and societal changes.
- **Equity and Inclusion:**
We strive to create equitable opportunities for all members of our college community. This involves actively dismantling systemic barriers that disproportionately affect marginalized groups.
- **Support and Resources:**
We provide resources and support for those who have experienced racism. This includes counselling services, reporting mechanisms, and support networks to ensure everyone feels safe and heard.
- **Accountability and Transparency:**
We hold ourselves accountable by regularly reviewing our policies and practices. We welcome feedback and encourage open dialogue to identify areas for improvement.

- **Representation and Participation:**
We are dedicated to ensuring diverse representation in all aspects of college life. This includes inclusive hiring practices, diverse student recruitment, and empowering voices from underrepresented communities in decision-making processes.

5.1.2. The College will actively encourage applications from individuals who are underrepresented in our workforce, including those from ethnic minority backgrounds and those who do not hold British citizenship. Where candidates from these groups meet the essential criteria for a role, we will seek to offer them an interview as part of our commitment to inclusive recruitment. All applicants will be assessed objectively and fairly, based solely on their skills, experience, and suitability for the role.

For clarity, the term “non-British applicants” refers to individuals who do not hold a British passport, regardless of their residency status in the UK.

This approach is consistent with the **Positive Action** provisions under the Equality Act 2010, which allow employers to take proportionate steps to address disadvantage, meet different needs, or encourage participation where people with protected characteristics are underrepresented.

- 5.1.3. This will be achieved through:
- Allowing applicants to self-identify their ethnicity and nationality during the application process.
 - Blind recruitment practices to reduce unconscious bias.
 - Ensuring diverse shortlists and, where possible, interview panels.
- 5.1.4. Job descriptions will be written using inclusive language to attract a diverse pool of applicants. We will avoid jargon or phrases that may unintentionally exclude certain groups.
- 5.1.5. By embedding these principles into our policies and practices, we aim to foster a college culture that not only rejects racism, but actively promotes inclusivity and equity. Together, we can create a community where diversity is celebrated, and everyone has the opportunity to thrive.
- 5.1.6. All members of the College community have a duty to make sure their learning and working environment is free from prejudice and provides a framework for promoting race and ethnicity awareness in line with MidKent College’s Diversity and Inclusion Strategy. As a part of our PSED, MidKent College monitors student demographic to ensure they are reflected in the staff body and also both the student and staff profiles reflect the local community with regard to ethnicity and address any imbalances through the implementation of the Equality, Diversity and Inclusion Operational Plan and, if deemed necessary, the use of positive action.

5.2. Disability

5.2.1. MidKent College will not discriminate against or tolerate the harassment of member of the college community because of a disability or perceived disability. MidKent College recognises disability to include someone who has a physical or mental impairment that has a substantial and long-term adverse effect on a person's ability to carry out day-to-day activities, including people with: physical and sensory impairments, learning difficulties, mental health problems, hidden impairments and people living with disabilities as referred to above.

5.2.2. The College welcomes applications from people with disabilities, values the contribution of existing staff and students with disabilities, and will treat staff and students fairly should they become disabled.

5.2.3. The College has made the commitment to the following:

- To interview all applicants with a disability who meet the minimum criteria for a job vacancy and consider them on their abilities.
- To make every effort when employees become disabled to make sure they stay in employment.
- To take action to ensure key employees e.g. managers, heads of service, reception staff, etc. develop the awareness needed of disability to make our commitments work.
- To ensure that employers recruiting and working with apprentice students are aware of their legal responsibilities, are familiar with this policy and promote Equality, Diversity and Inclusion. The welfare of apprentice students is monitored throughout the apprenticeship.
- Each year, to review the commitments and what has been achieved, plan ways to improve on them and let employees know about progress and future plans.

5.3. Sex and Gender Reassignment

5.3.1. MidKent College will not treat any member of the college community less favourably because of their gender, whether they are male, female, trans or/and undergoing any stage of gender reassignment. Discrimination and harassment on the grounds of sex, including sexual harassment, is not acceptable and will be dealt with in line with the College's disciplinary procedures.

5.3.2. MidKent College monitors staff profiles with regard to sex and address any imbalances through the implementation of the Equality, Diversity and Inclusion Operational Plan and, where deemed necessary, the use of positive action. For example, inclusive toilets are available at all MidKent College sites.

5.4. Sexual Orientation

5.4.1. MidKent College does not accept any form of discrimination or

harassment against any member of the college community because of their sexual orientation or their perceived sexual orientation. The College is committed to working towards an environment where all people feel able to be open about their sexuality.

5.5. Religion or Belief

5.5.1. MidKent College does not accept any form of discrimination or harassment against any member of the college community because of cultural, philosophical or religious beliefs or perceived beliefs. MidKent College is a secular College. The College respects the diverse cultural and religious traditions of all its students and staff and accepts the rights of individuals and groups to peaceably worship and fulfil their cultural obligations. Accordingly, the College will neither promote, nor permit to be promoted, any one religious faith or culture. Whilst College facilities exist primarily for the delivery of educational activities, arrangements will be made, where practicable, for students and staff to carry out essential religious observance. Dedicated facilities, such as contemplation rooms, cannot be provided for particular faith groups, but are provided for all.

5.5.2. Where cultural or religious needs conflict with existing working or learning requirements, the College will make adjustments, where practicable, to meet those needs. This may include adaptations for prayer times, dress codes, dietary requirements or religious holidays.

5.6. Age

5.6.1. MidKent College recognises that education is a life-long pursuit and will not use age-related criteria for learning and development opportunities or recruitment, unless it is to take positive action. All staff members have equal rights to training, promotion and other aspects of career development.

5.7. Pregnancy and Maternity

5.7.1. MidKent College will not discriminate against any member of the college community because of pregnancy or maternity. All staff members have equal rights to training, promotion and other aspects of career development. Further information for staff can be found in our Maternity Policy.

5.8. Marriage and Civil Partnership

5.8.1. MidKent College does not accept any form of discrimination or harassment against any member of the college community because they are single, married, or in a civil partnership.

5.9. Socio-economic Background

5.9.1. MidKent College does not accept any form of discrimination or

harassment against any member of the college community because of their socio-economic background, and actively works to support our community to remove barriers, such as limited transportation and financial restrictions, that could impact their ability to engage with the college e.g. bursaries, free breakfasts for students, staff cycle to work scheme, staff access to Benenden Health, and venue facilities for local groups and charities etc.

6. Our Standards

- 6.1. MidKent College supports and abides by all Equal Pay legislation and endeavours to provide a transparent reward system based on objective criteria and free from any bias.
- 6.2. All newly appointed staff will participate in an induction programme that reflects and reinforces our commitment to diversity and inclusion. As a part of the induction programme all new members of staff are required to participate in equality and diversity training. General and specialist equality and diversity training will be provided to staff on an ongoing and regular basis.
- 6.3. Subject to available resources and relevance to our College priorities, all staff, including part-time and hourly paid staff, will have an entitlement to undertake staff development to enhance their skills, effectiveness and opportunities. MidKent College recognises and values staff members' different needs including childcare, eldercare and personal development. Our staff timetables will, where reasonably feasible, be arranged in such a way as to facilitate work/life balance. Further information regarding flexible working can be found in our Flexible Working Policy.
- 6.4. Every employee is entitled to a working environment that promotes dignity and respect to all. All MidKent College staff have a responsibility to abide by this policy and no form of intimidation, bullying or harassment will be tolerated. Breaches of this policy will be regarded as misconduct and could lead to disciplinary proceeding.

7. Confidentiality and Monitoring

- 7.1. MidKent College will ensure that any diversity monitoring data on staff is used exclusively for monitoring purposes and that it is treated with confidentiality and sensitivity. Any information disclosed voluntarily will be safeguarded within the regulations set by the General Data Protection Regulation (GDPR) (2018).
- 7.2. The information we gather through monitoring will be used to inform planning, target setting and future action. Where monitoring reveals any gaps in our Diversity and Inclusion Strategy or our Equality, Diversity and Inclusion Policy, we will take prompt action through the Equality, Diversity and Inclusion Committee and the Equality, Diversity and Inclusion Operational Plan.

8. Duties and Responsibilities

8.1. Senior Leadership

8.1.1. Each member of the Executive Group and Senior Leadership Teams, supported by the People Team, has the responsibility to ensure the Equality, Diversity and Inclusion Policy and the overall promotion of FREDIE (Fairness, Respect, Equality, Diversity, Inclusion and Engagement) are put into practice in their areas of responsibility.

8.2. Equality, Diversity and Inclusion Committee

8.2.1. The Equality, Diversity and Inclusion Committee is a committee made up of staff across the organisation. It exists to:

- Ensure MidKent College has a culture which is fair, respectful, inclusive and diverse.
- Represent groups of staff and stakeholders to allow MidKent College to adapt to current and future demographic trends.
- Constantly challenge and evolve the organisation in order to eradicate the effects of unconscious bias from decision-making.
- Ensure all staff attend a full induction which includes understanding our policy and comprehensive training.
- Training is mandatory and updated regularly ensuring staff are fully informed of latest legislation, the process of implementing the policy and managing allegations of discrimination.

9. Training

9.1. We are committed to creating and maintaining a workplace culture that is inclusive, respectful, and fair for all. We believe that valuing diversity and promoting equality of opportunity is essential to our success as an employer and as a service provider. To support this commitment, Equality, Diversity and Inclusion (EDI) training is an integral part of our organisational learning and development framework.

9.2. The purpose of our EDI training programme is to:

- Increase awareness and understanding of equality, diversity and inclusion principles.
- Equip all staff with the knowledge and skills to recognise, prevent and challenge discrimination, harassment, bullying or bias.
- Ensure compliance with the Equality Act 2010 and all other relevant employment legislation.
- Promote an inclusive workplace culture that enables everyone to contribute, develop and thrive.

Every employee shares responsibility for upholding our EDI values and applying what

they have learned in their day-to-day work. We recognise that inclusion is an ongoing journey. Feedback from training participants, employee networks, and engagement surveys will be used to review and improve our EDI training provision regularly.

10. Breach of the Policy

10.1. MidKent College will take any breach to the Equality, Diversity and Inclusion Policy seriously. All breaches will be investigated and, where appropriate, will be considered under the relevant disciplinary procedure for staff or students. Any breach of the policy by visitors, MidKent College will take appropriate action in relation to the nature of the incident.

11. Complaints

11.1. Complaints made by staff can be made via the Grievance Policy or the Whistleblowing Policy & Procedure (details of these policies are available on SharePoint). Support for staff is available through their line management and/or the People Team.

11.2. Complaints made by anyone outside the College will be initially managed by the Marketing and Quality Teams.

12. GDPR

12.1. All records associated with this policy will be retained and disposed of in accordance with the Personal File Access and Employment Records Retention Policy.

13. Policy Monitoring, Review and Evaluation

13.1. A review of this policy will be undertaken by the review date by the policy writer and the senior manager responsible. The policy will then be presented to the Executive Group and, where required, the Governing Body for approval.

14. Equality Impact Assessment

14.1. This policy has been Equality Impact Assessed and generates no concerns about differential impact. The Equality Impact Assessment is filed by the policy owner.

15. Policy Distribution

15.1. A current version of this document is available via SharePoint. It does not

contain confidential information and can be released to external parties SharePoint site.

The Equality, Diversity and Inclusion Policy, version 1 has been consulted and negotiated with UCU representatives and its members on the understanding that the content will be subject to review no later than November 2028.

For and on behalf of UCU:

Signed: 

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Date: 05/06/25

Signed: 

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Date: November 2025