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I have carried out an equality impact assessment screening to help safeguard against discrimination and promote equality.			✓
I have considered the impact of the Policy/Strategy/Procedure (<i>delete as appropriate</i>) on the Welsh language and Welsh language provision within the University.			✓

EQUALITY, DIVERSITY & INCLUSION POLICY FOR STAFF AND STUDENTS

1. Introduction

- 1.1 Wrexham University is committed to supporting, developing and promoting equality, diversity and inclusion within its practices and activities, in line with our commitment to inclusion this policy supports our strategic vision by cultivating an inclusive environment where staff and students can thrive.
- 1.2 Our University recognises the real educational and business benefits of having a diverse community of staff and students who value one another and recognises that the institution is enhanced by a range of backgrounds, beliefs and cultures represented within its staff and student population, aiming to empower and transform people and places through Higher Education.
- 1.3 Our University opposes all forms of unlawful or unfair discrimination on the grounds of all protected characteristics, part-time or fixed term contractual status and caring responsibilities. Our University is committed to eliminating

discrimination and actions or omissions which amount to a breach of this policy. Unlawful discrimination will be treated as a disciplinary offence resulting if appropriate in disciplinary action.

- 1.4 The University is committed to providing a learning and working environment in which the rights and dignity of all its staff and student population are respected, and which is free from discrimination, prejudice, intimidation and all forms of harassment and bullying. Taking into account the diverse community of learning and working within the University, a zero-tolerance approach to bullying and harassment is taken in relation to all protected characteristics.

2. Freedom of Speech and Equality, Diversity and Inclusion at WU

In line with sector guidance our University will take such steps as are reasonably practicable to ensure that freedom of speech within the law is secured for our staff, students and visitors. Wrexham University is committed to upholding the principles of freedom of speech while ensuring that our learning and working environment remains a safe and inclusive space for all. We acknowledge the right to express opinions is vital to academic freedom and intellectual enquiry and simultaneously are committed to preventing harassment, discrimination and the creation of a hostile campus environment based on protected characteristics.

All staff, students and visitors are expected to engage respectfully, exercising their right to free expression in a manner that does not undermine the dignity, inclusion or safety of others. Our approach looks to balance freedom of speech with our duty under Equality legislation ensuring that debate contributes to an inclusive and respectful University community.

3. The Purpose of the Equality and Diversity Policy

- 3.1 The aim of this policy is to ensure that in carrying out its activities our University will have due regard to:
- eliminate unlawful discrimination, harassment and victimisation
 - advance equality of opportunity, across all activities of the University between different groups
 - foster good relations between people of diverse backgrounds
- 3.2 The policy aims to:
- develop and promote a culture of equality, diversity and inclusion throughout our learning and working environment;
 - support all staff and students including provision of relevant support relating to protected characteristics, part-time or fixed term contractual status and caring responsibilities.
 - work to prevent forms of unlawful discrimination.
 - deal with all forms of discrimination consistently and effectively.
 - ensure that the policy influences and informs the culture of our University.

- 3.3 This policy builds upon the foundation of equality legislation (including the Equality Act 2010) and anti-discrimination guidance, aiming to not only comply with legal requirements but to use these to advance best practice.
- 3.4 The EDI Action Group has specific responsibility for ensuring compliance with this policy, relevant legislation and the promotion of good practice in relation to Equality, Diversity and inclusion. The group helps to support and monitor equal opportunities by meeting regularly to discuss and review matters. The Executive Director of Human Resources also has specific responsibilities for assisting with the implementation and monitoring of equal opportunities for staff at the University.

4. Scope

- 4.1 This policy applies to recruitment, terms and conditions of employment (including staff, training, career development, promotion, grievance and disciplinary procedures and all other aspects of employment and the working environment).
- 4.2 It also applies to all aspects of the University's relationship with our students, including (but not limited to) admissions, teaching and assessment, the award of qualifications, disciplinary and complaints procedure and access to University facilities.
- 4.3 All staff and students are required to comply with this policy when dealing with other staff members (including temporary or agency staff and consultants) and students, job applicants, clients, suppliers, customers and visitors of the University, and anyone else with whom they encounter during the course of their employment/study.

5. Definitions

- 5.1 Under the Equality Act 2010 protected characteristics are the grounds upon which discrimination is unlawful. The protected characteristics (section 4) under the Act are:
- age
 - gender
 - disability
 - gender reassignment (for the purposes of this policy we refer to the Equality Act legal definition here, however in general documentation our University prefers to use more inclusive language such as gender transition)
 - marriage and civil partnership
 - pregnancy and maternity
 - race
 - religion or belief (including lack of belief)

- sexual orientation

5.2 The Equality Act 2010 sets out the following types of discrimination:

Direct Discrimination

Direct discrimination occurs when someone is treated less favourably than another person on the grounds of a protected characteristic.

Associative Discrimination

Associative discrimination occurs when someone is directly discriminated against because they are associated with another person who has a protected characteristic.

Discrimination by Perception

Discrimination by perception occurs when someone is directly discriminated against because others think that they possess a particular protected characteristic. They do not necessarily have to possess the characteristic, just be perceived to have the characteristic.

Indirect Discrimination

Indirect discrimination occurs when there is a criterion, provision or practice that applies but disadvantages an individual or group with a particular protected characteristic.

Harassment

Harassment occurs when a person's behaviour is deemed offensive by the recipient of that person's behaviour. Affected persons can complain about behaviours they find offensive even if such behaviours are not directed at them personally.

The following list provides examples of harassment. This list is not exhaustive.

- Unnecessary, inappropriate and unwanted physical contact.
- Indecent or sexual assault.
- Unwelcome advances/attention.
- Racist discriminatory behaviour, including jokes and banter, insults, threats, degrading references, exclusion.
- Religious discriminatory behaviour, including jokes and banter, insults, threats, degrading references, exclusion.
- Biphobic, homophobic and transphobic discriminatory behaviour, including jokes and banter, insults, threats, degrading references, exclusion, outing individuals and asking inappropriate questions.
- Gender identity discriminatory behaviour, including jokes and banter, insults, threats, degrading references, exclusion, outing individuals and asking inappropriate questions.

- Compromising invitations or gifts.
- Oral and written harassment through jokes, offensive language, name calling, gossip and slander.
- Visual displays of any offensive material, including electronically generated material.
- Any comments which imply that gender impairs the person's ability to perform their job.
- Verbal or physical threat.

For behaviours to count as harassment in equality law, they have to be one of three types:

1. Unwanted behaviour related to the protected characteristics listed in the Equality Act 2010, which has the effect of violating dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment
2. Sexual harassment
3. Less favourable treatment because of submission to or rejection of previous sex or gender identity harassment

Harassment by a Third Party

Harassment by a third party occurs when:

1. a third party subjects a member of staff to any form of harassment during the course of their employment
2. the employer fails to take reasonable practicable steps to protect their staff members from that third-party harassment
3. the third party person/harasser is also more than one or the same individual, not limited to one single occasion and who does not need to be employed by the same organisation.

Victimisation

Victimisation occurs when an individual is treated less favourably because they have made or supported a complaint or grievance under the Equality Act 2010. Our University is committed to ensuring that its staff and students are treated with dignity and respect and acts of unfair treatment will not be tolerated. In order to support this commitment a Dignity at Work Policy and Procedure was introduced with appointed Dignity at Work Advisors who offer a confidential and informal service to staff who feel that they have been subjected to bullying or harassment. Further details can be found within the staff intranet within the Human Resource pages - [Dignity at work](#)

6. Language

- 6.1 Our University recognises that the use of non-inclusive language can reinforce bias, prejudice, and discrimination. To foster a respectful and welcoming environment, we encourage all members of our community to use language that is inclusive and considerate of others. We strongly recommend that staff,

students, and visitors avoid terminology or expressions that may be considered exclusionary or discriminatory. By choosing inclusive language, we affirm our commitment to equality, diversity, and inclusion, and support a culture where every individual feels respected and valued.

- 6.2 Staff and students are expected to exercise their freedom of speech responsibly. This includes ensuring that written and spoken material is expressed in a way that upholds open debate and academic freedom, while avoiding language that unlawfully discriminates, harasses, or incites hatred.
- 6.3 Rather than be prescriptive about use of language and terminology, staff and students are asked to exercise good judgement. In particular, to be aware of and refrain from using inappropriate references to age, disability, gender identity, marriage and civil partnership, pregnancy and maternity, race, religion or belief (including lack of belief) and sexual orientation.

7. Recruitment

- 7.1 Our University will ensure that the recruitment and selection of staff and students is conducted fairly and transparently, in accordance with its Recruitment and Selection Policies.

8. Terms and Conditions of Employment

- 8.1 Our University will ensure that terms and conditions of employment are free from all forms of direct and indirect discrimination and apply equally with regards to individuals with protected characteristics, part-time or fixed term status and caring responsibilities. No requirements or conditions will be imposed, directly or indirectly, which will or may place any individuals/groups at an unfair or unlawful disadvantage.
- 8.2 Our University recognises that flexibility with regard to working patterns will assist the broadest range of people to work at Wrexham University. Our University will consider all requests for flexible working patterns and will authorise a request wherever possible unless there is a sound business reason to decline the request.
- 8.3 Grievance and disciplinary procedures will be operated without discrimination on the grounds of all protected characteristics, part-time or fixed term status and caring responsibilities.

9. Training, Career Development and Progression

- 9.1 All staff members will be provided with the appropriate training (in line with business priorities/needs) to enable them to improve their performance and achieve the performance standards and objectives set for them, regardless of

an individual's protected characteristic, part-time or fixed-term status and caring responsibilities

- 9.2 Our University will ensure that opportunities for training and career development are made equally available to all staff.
- 9.3 All staff will receive refresher training in line with current Equality, Diversity and Inclusion updating; to include all new staff as part of their Induction programme.
- 8.4 Career progression within the University is based on personal merit and the reasonable requirements of the job regardless of all protected characteristics, part-time or fixed term status and caring responsibilities.

10. Responsibilities

Our University expects all staff, students and interested parties to behave in accordance with the Equality, Diversity & Inclusion Policy.

Staff who line manage others have a duty to ensure the policy is communicated to their team.

This policy cannot succeed without the active support of the entire University community. The responsibility for delivering the policy extends to every member of the institution; the implementation of this policy is therefore a shared responsibility amongst staff and students of the University. In addition, key individuals have specific responsibilities as set out below.

Role	Responsibility
Vice-Chancellor	Overall responsibility for the policy, which includes the responsibility for ensuring that the policy is communicated, implemented, monitored and continuously reviewed according to legislation.
Governing Body	To encourage, foster and promote a culture of equality, diversity and inclusion. To oversee the University's progress towards Equality, Diversity and Inclusion through regular agenda items at meetings of the Board or its Sub Committees.
EDI Action Group	Responsible for ensuring that our aims regarding equality, diversity and inclusion are met, for fostering a working and learning environment where all staff and students can fulfil their potential and for driving forward the implementation of the policy.
Executive Director of Human Resources	To support the aims of the policy, ensure that staff and managers are aware of their responsibilities under this

Role	Responsibility
supported by the Head of Organisational Development and Diversity	policy and provide appropriate training and support to enable them to fulfil them.
Directors, Deans of Faculty, Managers and Supervisors	To be responsible for promoting equality, diversity and inclusion to students and staff, ensuring that all matters of alleged discrimination, harassment and inappropriate behaviour are investigated promptly and thoroughly. Additionally, line managers are responsible for ensuring that staff identified as having specific responsibilities engage with the policy and carry out actions set out within the Strategic Equality Plan and its associated objectives.
Interim Executive Director of Finance	To have responsibility for establishing rigorous procurement systems, ensuring all contractors and tendering organisations comply with the University's Equality Diversity & Inclusion Policy.
Trade Unions	To provide advice, support and representation for their members and engage with the University to promote equal opportunities, prevent unlawful discrimination and help to foster good relations.
Student Union	To receive feedback from students and act upon it, sharing with the appropriate department/committee in the University.
All staff, students, external partners, service providers and suppliers	To support the aims of the policy, encourage non-discriminatory practices and report incidents of behaviour that fail to comply with the policy.

In line with our mission and values, we will strive to support the needs of all members of our community and achieve the highest possible standards in education delivery, employment practices and decision-making.

11. Implementation

- 11.1 The Executive Director of HR, supported by the Head of Organisational Development and Diversity, is responsible for the overall implementation and monitoring of the policy through the Strategic Equality Objectives and will provide progress reports on an annual basis. The Head of Organisational Development and Diversity will provide support to those responsible for delivering specific actions.
- 11.2 All students should be provided with information relating to the policy on registration and abide by its principles. New members of staff must receive information on Equality, Diversity and Inclusion obligations and provisions from

their managers at an early stage in their employment, including attendance at Equality, Diversity and Inclusion updating sessions. All staff members should familiarise themselves with this policy and ensure their practices are consistent with its contents and legislation. Individual members of staff should inform their line manager, their HR Business Partner and/or Trade Union representative if they believe that discrimination is taking place. [Dignity at Work Advisors](#) are also available to support staff, providing signposting options should staff members feel that they are being subjected to bullying or harassment.

- 11.3 In order to ensure their effectiveness, all University policies and procedures will be supported by an Equality Impact Assessment (EIA).

12. Communication

- 12.1 It is important that staff at all levels are aware of this policy in order to comply with its requirements. A copy is available on the staff intranet and copies must be made available to staff who have limited access to a computer.
- 12.2 Our University will consult periodically with relevant interested parties to ensure representation of diverse groups and aim to improve the eradication of discrimination.
- 12.3 An annual report will be made available detailing the progress of the Strategic Equality Plan and its objectives and will be published externally on the University website. The report will include specific measures adopted to promote equal opportunities, progress on developments, and the outcome of the relevant year's monitoring of statistics, EIAs and future priorities.
- 12.4 The policy will be published online and made available in hard copy and alternative formats upon request.

13. Complaints

- 13.1 Our University will take seriously any instances of non-adherence to the Equality, Diversity & Inclusion Policy by students, staff or visitors. The University will ensure that all staff and students are given opportunities to pursue reasonable means to follow procedures should they feel they are experiencing discrimination. Complaints of discrimination on the grounds of the areas covered by this policy should be brought using the appropriate [Grievance Policy and Procedure for Staff](#) and [Complaint Procedure for students](#).
- 13.2 Any instances of non-adherence will be investigated and where appropriate will be considered under the relevant procedure for students and [Disciplinary](#)

[Procedure for staff](#). Appropriate action in relation to breaches of the policy by visitors will be taken.

- 13.3 Cases involving bullying and harassment in the workplace may be referred initially to a Dignity at Work Advisor. Should this approach not lead to a satisfactory resolution of the problem, information on how to proceed with a complaint is provided within the [Dignity at Work Policy](#)..
- 13.4 Any student who wishes to raise a complaint will be referred through the [Complaints Procedure for Students](#) set out in the Student Handbook. Students experiencing incidents of bullying or harassment should refer to the [Anti-Harassment and Anti-Bullying Policy and Procedure](#)
- 13.5 Applicants with concerns about how this policy is applied are encouraged to contact the Head of Organisational Development and Diversity within the Human Resources Department.

14. Monitoring

- 14.1 Our University is committed to monitoring the effectiveness of this policy. The University will undertake regular reviews into all aspects of our policies, procedures and practices in relation to recruitment, terms and conditions of employment, training, career development, promotion, grievance and discipline, performance reviews, dismissals and other reasons for leaving to identify any trends or patterns emerging and, if so, to analyse whether or not these are justified.
- 14.2 Monitoring data will enable our University to identify differences among staff with respect to grade and position, contract type, career development, training, and access to other opportunities. It will also help us understand differences among student groups in relation to teaching and learning, retention, progression and achievement, assessment, access to learning resources, support and guidance, as well as curricular and other opportunities.
- 14.3 The University is committed to identifying and taking all steps necessary to eliminate any unjustified discrimination revealed by this monitoring process.

15. Review

- 15.1 This policy and procedure will be reviewed every three years, or in line with changes to relevant legislation or University Practice; whichever is sooner.

16. Equalities Impact Assessment

- 16.1 The Equality Act 2010 includes a requirement for all HE Institutions to carry out impact assessments on all policies. This policy has been screened to determine equality relevance for the following equality groups: grounds of age,

disability, gender identity, marriage and civil partnership, pregnancy and maternity, race, religion or belief (including lack of belief), gender expression, sexual orientation and trans or non-binary identity.

- 16.2 In order to facilitate the impact assessment process, appropriate records will be retained during any future implementation of this policy.
- 16.3 Information on all protected characteristics will be collected for monitoring purposes. Details relating to any adverse impact revealed following assessment will also be recorded for monitoring purposes. Confidential monitoring of outcomes will also be recorded to evaluate the impact of the procedure upon University staff.
- 16.4 The policy and its associated Impact Assessment will be reviewed every three years.

17. Sources of Further Guidance

[Equality Act 2010](#)

[Human Rights Act 1998](#)

[Equality & Human Rights Commission](#)

[ACAS \(Advisory, Conciliation and Arbitration Service](#)

[Advance HE](#)

[Regulatory advice 24: Guidance related to freedom of speech](#)

We are committed to ensuring that our policies best support the needs of all of our staff and students. We welcome your thoughts and feedback regarding the inclusivity of this policy, please contact Alison Bloomfield on Alison.Bloomfield@wrexham.ac.uk

If you would like a copy of this policy in large print or another format please contact Alison Bloomfield, Head of Organisational Development & Diversity - Alison.Bloomfield@wrexham.ac.uk.