

Equity, Diversity and Inclusion Policy

From August 2025

[1. Policy Summary](#)

[2. Scope](#)

[2.1. What does this policy cover?](#)

[2.2. What does this policy not cover?](#)

[3. General Principles](#)

[4. How to raise a concern](#)

[5. Procedure](#)

[6. Data Protection and Record Keeping](#)

[7. Appeals](#)

[8. False Complaints](#)

[9. Glossary of terms](#)

[10. If you need support](#)

[11. Linked and other policies and legislation](#)

[12. Changes since previous policy](#)

[13. Policies superseded by this document](#)

1. Policy Summary

- 1.1. The OCA is committed to providing parity of opportunity for all students wishing to study with us, and staff wishing to work with us. We aim to create and provide a positive and open learning, working and tutoring environment that fosters a sense of belonging, respect, and collaboration at all levels of the organisation.
- 1.2. As an organisation, OCA values diversity in our student, staff, and tutor body and will work to ensure that each individual, whatever their background, can achieve their full potential and have a fulfilling experience of higher education. We will build trust within the institution and course materials both for tutors and students to be their authentic selves.
- 1.3. We will reflect and actively engage with decolonisation and liberation agendas as part of our wider responsibility to dismantle privilege, power, and exclusion. We want to raise awareness of and challenge the complex and varied legacies of racism, imperialism and colonialism within all spheres of OCA and apply cultural sensitivity to all materials, policies and procedures
- 1.4. We will actively try to reduce gaps in access, retention and attainment for students from all backgrounds and identities and across all disciplines through our access and participation plan and EDI action plan.
- 1.5. To ensure there is zero tolerance for unlawful discrimination, harassment, and victimisation at the OCA and create an inclusive, respectful, and equitable environment for all students and staff.

2. Scope

2.1. What does this policy cover?

- 2.1.1. All OCA students, tutors, and staff: It applies to everyone within the OCA community.
- 2.1.2. The purpose and general principles of EDI.
- 2.1.3. The principles for embedding EDI.
- 2.1.4. How to raise a concern.
- 2.1.5. The definitions of key terms.

2.2. What does this policy not cover?

- 2.2.1. Detailed disciplinary procedures and appeals processes which are outlined in their respective policies.

3. General Principles

3.1. The Open College of the Arts will:

- 3.1.1. Embed Equity, Diversity and Inclusion across all areas of work, and foster a culture which regularly and routinely considers and discusses issues of Equity, Diversity and Inclusion.
- 3.1.2. Provide training opportunities for staff and students to engage with EDI and social justice agendas including allyship and bystander intervention guidance.
- 3.1.3. Include mandatory training for staff at induction points and refresher training every two years.
- 3.1.4. Highlight Unconscious Bias training at pre-assessment briefings.
- 3.1.5. Champion EDI within leadership teams and governance groups and ensure it forms a part of PDR objectives.
- 3.1.6. Work in partnership with our students at all levels and from all backgrounds, continue conversations and engage with significant cultural challenges and change.
- 3.1.7. Work with our Student Association to provide appropriate opportunities and spaces for underrepresented student and staff groups.
- 3.1.8. Ensure policy and other documents, information, websites, web forums, and social media operated by the OCA will be made accessible for all, conforming to appropriate standards and via various media as per our accessibility policy.
- 3.1.9. Create opportunities and provide a way into academia for those who may be marginalised by systems & institutional biases and who are under-represented within OCA.
- 3.1.10. Maintain OCA's EDI hub on OCA Learn.
- 3.1.11. Monitor OCA's safe space reporting tool.
- 3.1.12. Fulfil our anticipatory reasonable adjustment duty by anticipating any barriers to access and ensure that disabled students can fully participate in their education and enjoy the other benefits, facilities and services which we provide for students.
- 3.1.13. Implement Equality Impact Assessments for operational and academic changes and developments. These will form part of decision making processes putting EDI at the very heart of our strategies, policies, practices.
- 3.1.14. Embed an Inclusive Curriculum Tool (ICT) into our Learning Design Framework.
- 3.1.15. Take an intersectional approach to EDI and ensure everyone at the OCA has an understanding of the term and its implications.

- 3.1.16. Undertake positive action based on qualitative evidence such as consultations or focus group work with students and staff, equality impact assessments, surveys showing poor experience of an area of provision related to a protected characteristic, complaints and discrimination claims or evidence of similar problems gathered by other education providers.
- 3.1.17. Review systems to monitor & report data related to the nine protected groups to increase understanding of how students with more than one characteristic may be further disadvantaged.
- 3.1.18. Ensure we use a wider range of options in terminology for example around ethnicity, disability and gender when collecting personal information but understand disclosure is a choice.
- 3.1.19. Review communications under an EDI lens for example enrolment and withdrawal forms, surveys etc and improve the feedback loop.
- 3.1.20. Regularly conduct access audits across our platforms, policies and procedures.
- 3.1.21. Continually review staff profile and recruitment processes to promote a more diverse workforce and better reflect the diversity of the student population.
- 3.1.22. Ensure our workplace is accessible for all staff members.

4. How to raise a concern

- 4.1. The OCA takes extremely seriously any reported cases whereby a student or staff feels discriminated, harassed, bullied, or victimised. As a student, you can raise a concern formally with the OCA through the [Learner Support Helpdesk](#). If you are unable to submit a request through the helpdesk you can also email complaints@oca.ac.uk. Once received, the Complaints Management Team will review and take action.
- 4.2. Staff wishing to report any incident should, where possible, in the first instance talk to their line manager. As a member of staff you can raise a concern formally with the OCA by emailing complaints@oca.ac.uk. Once received, and if appropriate, cases will be reviewed by the Head of HR.
- 4.3. You can raise a concern pertaining to the OCA activities about discrimination, harassment or bullying that you witness or overhear happening to someone else. If you raise a concern the team investigating may contact you for further information.

- 4.4. Staff and students can disclose anonymously via our safe space reporting space which is forthcoming.
- 4.5. Please note if you disclose anonymously we won't be able to contact you to offer any advice or support and reporting anonymously will not lead to formal action being taken. It does however alert us that something has happened and allows us to better understand the prevalence of issues within the OCA.
- 4.6. There is no deadline to reporting an allegation in accordance with this policy; however, reporting an incident as soon as possible after it has occurred is recommended.
- 4.7. If more than one person is experiencing discrimination, harassment or bullying from the same source and they consider reporting an allegation as a group, each individual in the group should, where possible, report on an individual basis. Responses and outcomes of allegations will be advised on an individual basis and not to a group.

5. Procedure

5.1. Informal Action

- 5.1.1. If you are a victim of discrimination, harassment or bullying, you are encouraged to take informal action to resolve the issue, wherever possible.
- 5.1.2. Where possible, it is strongly advised to retain records of incidents and/or copies of evidence, such as emails, photos, screenshots.
- 5.1.3. You can raise an issue informally by, for example
- 5.1.4. Raise the issue with the person(s) who has caused concern directly, explain the issue and why it is unwanted and/or offensive.
- 5.1.5. As a student, discuss the issue with your tutor, Programme Leader, or a member of staff and ask them for support.
- 5.1.6. As a member of staff, where appropriate discuss with your line manager, or a member of the OCA senior leadership team for support.
- 5.1.7. Write a letter or email to the person(s) who has caused concern to explain the issue and why it is unwanted and/or offensive.

- 5.1.8. It is not a requirement to raise a concern informally; you can raise a concern formally if you wish.
- 5.1.9. It may not be possible or feasible to raise an issue informally, or attempts to discuss informally are unsuccessful, in which case it is appropriate to raise a formal concern.
- 5.2. Formal Action
- 5.2.1. You can raise a concern formally through the [Learner Support Helpdesk](#). If you are unable to submit a request through the helpdesk you can also email complaints@oca.ac.uk. Once received, the Complaints Management Team will review and take action.
- 5.2.2. Once received, the Complaints Management Team will confirm receipt within five working days. This is the start of the formal stage.
- 5.2.3. Your case will be reviewed by one of the team and a response to the concern provided within 30 working days. If for any reason the review of the case will take longer than 30 working days, a member of the team will be in touch to advise of new timescales for a response.
- 5.2.4. As part of the investigation the reviewing officer will review all of the information provided as evidence. They may contact you to request further information and/or evidence. The reviewer will also contact the person(s) about whom the concern is raised to request their account, information, and/or evidence.
- 5.2.5. If the concern raised is in relation to a student, and upon review there is evidence that discrimination, harassment or bullying has occurred, the case will be reviewed in line with the [Student Code of Conduct](#), including sanctions as specified in section 11 of the code.
- 5.2.6. If the concern raised is in relation to a member of staff (including tutors), and upon review there is evidence that discrimination, harassment or bullying has occurred, the case will be reviewed in line with the Staff Disciplinary Policy (Internal Only) by the Head of HR.
- 5.2.7. The OCA may make temporary arrangements, for example, with allocations to tutor groups and other study activities, as part of

the process of investigating an allegation. Such arrangements may be made permanent, depending on the outcome of an allegation and other welfare considerations.

- 5.2.8. If on review there is insufficient evidence to determine that discrimination, harassment or bullying has occurred, this will be laid out to appropriate parties in the response.
- 5.2.9. Cases of alleged serious criminal offences should be reported by the individual (for example, the victim or a concerned bystander) to the Police. In such cases, the OCA will apply an appropriate policy (such as the Student Code of Conduct) until the outcome of any criminal investigation is confirmed.

6. Data Protection and Record Keeping

- 6.1. Due to the sensitive nature, complaints of discrimination, harassment or bullying will be investigated with particular care and will remain, where possible, confidential or shared with relevant parties on a need-to-know basis. The purpose of this provision is to protect the confidentiality of the person making the complaint and the reputation of the person being complained about until the matter has been resolved. If it is deemed that the safety of an individual(s) is at risk of serious harm, confidentiality in these circumstances may be overridden by legal obligations to disclose, for example, to make a safeguarding referral or contact the emergency services. Please see the [Data Protection Policy](#) for details.
- 6.2. Allegations of discrimination, harassment or bullying reported to the OCA are retained on a student's record for the duration of study.
- 6.3. Allegations of discrimination, harassment or bullying or bullying which are escalated to the emergency services, or social services are required to be retained for the duration of study plus seven years.
- 6.4. Where an allegation of discrimination, harassment or bullying or bullying is considered at the formal stage by the OCA and discrimination, harassment or bullying is deemed to have occurred, each case will be then reviewed under the [Student Code of Conduct](#).
- 6.5. As part of the [Student Code of Conduct](#), cases may be passed to The Open University at the Review Stage (section 8), and data may be passed to The Open University to facilitate this. Please refer to The Open University [Student Privacy Notice](#) for details.

7. Appeals

- 7.1. If a decision is made that discrimination, harassment or bullying has not occurred (see paragraph 5.2.8) you may request an administrative review of this decision in line with section 10 of the [Student Complaints and Non-Academic Appeals Policy](#). Appeals must be made within 28 days of the response.
- 7.2. If you are seeking to appeal a decision made through the [Student Code of Conduct](#) as outlined in paragraph 5.2.5, please refer to that policy for details on appeals.
- 7.3. If you are seeking to appeal a decision made through the Staff Disciplinary Policy (Internal Only) as outlined in paragraph 5.2.6, please refer to that policy for details on appeals.

8. False Complaints

- 8.1. The OCA takes seriously false accusations of discrimination, harassment or bullying - if an individual brings a complaint that is found to be mischievous or malicious then appropriate action will be taken. This may include disciplinary proceedings.

9. Glossary of terms

- 9.1. Antisemitism/Anti-Jewish racism
 - 9.1.1. The Open College of the Arts adopts the full International Holocaust Remembrance Alliance's working definition on antisemitism in line with the UK government and recommendations from the United Nations (UN).
 - 9.1.2. The definition states: 'antisemitism is a certain perception of Jews, which may be expressed as hatred toward Jews. Rhetorical and physical manifestations of antisemitism are directed toward Jewish or non-Jewish individuals and/or their property, toward Jewish community institutions and religious facilities'.
 - 9.1.3. Read the full definition [What is antisemitism?](#) (accessed 30 July 2025)
- 9.2. BAME
 - 9.2.1. Black, Asian, Minority Ethnic (BAME) is a term that has been widely used by government departments, public bodies, the

media and others when referring to ethnic minority groups. However, it emphasises certain ethnic minority groups and excludes others. The terms can also mask disparities between different ethnic groups and create misleading interpretations of data. [Writing about ethnicity - GOV.UK](#) (accessed 30 July 2025)

9.2.2. At OCA we will refrain where possible from using this term - we may need to refer to it in statistical collection requirements. We will instead endeavour to be clearer and more respectful in our use of language relating to race and ethnicity. We are aware language is constantly evolving and that terminology can be a personal choice, the language that one person identifies with and uses to describe themselves may differ from somebody else. We must remain respectful of individual preferences and not make assumptions about how a person chooses to self-identify and seek to ask when we can.

9.2.3. Inc Arts have created a guide to terminology, for use by everyone who wants to be an effective ally and wants to avoid causing further harm through the use of casual and inaccurate language. [You can view the #BAMEover statement here.](#) (accessed 30 July 2025)

9.3. Diversity

9.3.1. Diversity means a spectrum of differences in ability, age, culture, gender, race, religion, and sexuality, for example. Diversity is a celebration of a rich balance of differences.

9.4. Equality

9.4.1. Equality is about ensuring that every individual has an equal opportunity to make the most of their lives and talents.

9.4.2. It is also the belief that no one should have poorer life chances because of the way they were born, where they come from, what they believe, or whether they have a disability.

9.4.3. Equality recognises that historically certain groups of people with protected characteristics such as race, disability, sex and sexual orientation have experienced discrimination.

9.5. Equity

- 9.5.1. Equity is often referred to as “levelling the playing field”. Equity ensures everyone has individualised support and personalised resources to reach their potential and access opportunities. It anticipates and recognises differences and differing needs.
- 9.6. Ethnicity
- 9.6.1. At the OCA we adopt the [Advance HE](#) definition of ethnicity and it is important to remember that everyone has an ethnicity and ‘white British’ is an ethnic group. Ethnicity refers to a group of people who have a shared history, a cultural tradition, a common geographical origin and a common language.
- 9.7. [Read the full Advance HE definition here Use of language: race and ethnicity | Advance HE](#) (accessed 30 July 2025)
- 9.8. Global Majority
- 9.8.1. The term Global Majority was coined by Rosemary Campbell-Stephens. She says “Global Majority is a collective term that first and foremost speaks to and encourages those so-called to think of themselves as belonging to the global majority. It refers to people who are Black, Asian, Brown, dual-heritage, indigenous to the global south, and or have been racialised as 'ethnic minorities'. Globally, these groups currently represent approximately eighty per cent (80%) of the world's population making them the global majority now, and with current growth rates, notwithstanding Covid-19 and its emerging variants, the global majority is set to remain so for the foreseeable future. Understanding that singular truth may shift the dial, it certainly should permanently disrupt and relocate the conversation.” Find out more here [Global Majority; Decolonising the language and Reframing the Conversation about Race](#) (accessed 30 July 2025)
- 9.9. Inclusion
- 9.9.1. Inclusion is more than just having lots of differences represented; it is about making sure that everyone feels comfortable and confident, valued and respected, heard and understood.
- 9.9.2. Inclusive learning and teaching in higher education refers to the ways in which pedagogy, curricula and assessment are

designed and delivered to engage students in learning that is meaningful, relevant and accessible to all. It embraces a view of the individual and individual difference as the source of diversity that can enrich the lives and learning of others. [Inclusive Learning and Teaching in Higher Education: A Synthesis of Research](#) (accessed 30 July 2025)

9.10. Intersectionality

- 9.10.1. The term intersectionality was first used by black feminist and legal scholar Kimberlé Crenshaw in 1989. Intersectionality recognises that people's identities and social positions are shaped by multiple factors. Among others, a person's age, disability, ethnicity, gender, gender identity, religion and belief, sexual orientation and socioeconomic background contribute towards their unique experiences and perspectives. [Intersectional approaches to equality research and data | Advance HE](#) (accessed 30 July 2025)

9.11. Positive Action

- 9.11.1. [The Equality Act](#) contains provisions which enable education providers to take proportionate action to achieve fuller and more effective equality outcomes for members of groups that share a protected characteristic that are socially or economically disadvantaged or excluded, or who otherwise face the consequences of past or present discrimination or disadvantage, even though these actions involve discrimination against members of other groups which might otherwise be unlawful. These are known as the 'positive action' provisions.

9.12. Protected Characteristics

- 9.12.1. There are nine 'protected characteristics'. These are:

- 9.12.1.1. Age
- 9.12.1.2. Disability
- 9.12.1.3. Gender reassignment*
- 9.12.1.4. Marriage and civil partnership
- 9.12.1.5. Pregnancy and maternity
- 9.12.1.6. Race
- 9.12.1.7. Religion or belief
- 9.12.1.8. Sex
- 9.12.1.9. Sexual orientation.

- 9.12.1.9.1. *The Open College of the Arts policies, practices and procedures specifically extend to all gender identities including trans, non-binary and gender non-conforming people. [Please see our Gender Identity Policy.](#)

9.13. Race

- 9.13.1. The OCA adopts the [Equality Act \(2010\)](#) definition of race discrimination as its definition of racism. The definition states 'race can mean your colour, or your nationality (including your citizenship). It can also mean your ethnic or national origins, which may not be the same as your current nationality. Race also covers ethnic and racial groups. This means a group of people who all share the same protected characteristic of ethnicity or race. A racial group can be made up of two or more distinct racial groups, for example black Britons, British Asians, British Sikhs, British Jews, Romany Gypsies and Irish Travellers'.
- 9.13.2. At the Open College of the Arts, we recognise that 'race' is a social construct and the problematic nature of the term 'race'. We only use this term for consistency with other public bodies and in line with Advance HE. [Use of language: race and ethnicity | Advance HE](#) (accessed 30 July 2025)

9.14. Reasonable adjustment duty

- 9.14.1. The reasonable adjustment duty requires providers to take positive steps to ensure that disabled students can fully participate in the education and other benefits, facilities and services provided for students.

10. If you need support

- 10.1. Should you need any help or would like to raise any issues with this policy, you should contact our edi@oca.ac.uk for more information.
- 10.2. The OCA will work to gather student feedback on the outline of the policy, its intentions, the administration of the policy, and a review of all these points in practice. These will then be fed into future reviews of the policy.
- 10.3. If you are a disabled student and you would like to receive this procedure in an alternative format please contact the OCA's Learner Support team.
- 10.4. If you live in Wales and require this policy in the Welsh language then please contact enquiries@oca.ac.uk.

11. Linked and other policies and legislation

11.1. OCA Policy:

- 11.1.1. [Anti-Harassment & Bullying Policy.](#)
- 11.1.2. [Complaints Policy](#)
- 11.1.3. [Criminal Convictions Policy](#)
- 11.1.4. [Code of Conduct Policy](#)
- 11.1.5. [Data Protection and Confidentiality Policy](#)
- 11.1.6. Fair Selection & Recruitment Policy (Internal only)
- 11.1.7. [Gender Identity Policy](#)
- 11.1.8. [Harassment & Sexual Misconduct Policy.](#)
- 11.1.9. Menstruation & Menopause Wellbeing Policy (Internal only)
- 11.1.10. [Online Behaviour and Social Media Policy](#)
- 11.1.11. [Prevent Policy](#)
- 11.1.12. [Safeguarding Policy](#)
- 11.1.13. Staff Disciplinary Policy (Internal Only).
- 11.1.14. [Student Accessibility Policy.](#)
- 11.1.15. [Student Complaints Policy.](#)
- 11.1.16. Whistleblowing Policy (Internal Only).

11.2. Legislation

- 11.2.1. This policy references the [Equality Act 2010](#), which requires public sector bodies to have due regard to the need to:
 - 11.2.1.1. eliminate unlawful discrimination, harassment and victimisation
 - 11.2.1.2. advance equality of opportunity between people who do and do not share a protected characteristic (see 3.11 above)
 - 11.2.1.3. foster good relations between people who share a protected characteristic and those who do not share a protected characteristic.
 - 11.2.1.4. The duty to comply with the Act is referred to as the 'public sector equality duty' (PSED).
 - 11.2.1.5. We also promote equality between different socioeconomic groups, as well as other groups underrepresented in higher education.
 - 11.2.1.6. The Act states that meeting different needs involves taking steps to take account of disabled people's disabilities. It describes fostering good relations as tackling prejudice and promoting understanding between people from different groups. It states that compliance

with the duty may involve treating some people more favourably than others.

- 11.3. [The Equality and Human Rights Commission](#) monitors higher education providers. They can enforce the public sector equality duty through [judicial review](#).
- 11.4. Other relevant legislation:
 - 11.4.1. [Protection from Harassment Act \(1997\)](#)
 - 11.4.2. [Data Protection Act \(2018\)](#)
 - 11.4.3. [Human Rights Act \(1998\)](#)
- 11.5. Links to external websites
 - 11.5.1. [Organisations That Can Help](#)

12. Changes since previous policy

- 12.1. Since the last version of this policy, the following changes have been made:
 - 12.1.1. Policy retitled Equity, Diversity and Inclusion.
 - 12.1.2. Policy updated to utilise the latest OCA policy template.
 - 12.1.3. Responsibility for Safe Space Reporting tool shared between Learner Support and the EDI Lead.
 - 12.1.4. Inclusive Curriculum Tool (ICT) replaces EDI checklists in the Learning Design Framework.
 - 12.1.5. Reviewing the policy email address changed from learnersupport@oca.ac.uk to edi@oca.ac.uk.
 - 12.1.6. URLs updated to reflect linked titles.
 - 12.1.7. Removal of reference to a designated budget

13. Policies superseded by this document

- 13.1. This policy is subject to the [OCA's Terms and Conditions](#).