



University of London

Equal Opportunities Policy and Statement

Introduction

1. The University of London was founded upon the principles of equality. Established to provide education on the basis of merit and without regard to race, creed or political belief, it was the first university in the United Kingdom to admit women to its degrees.
2. Our commitment to this tradition of equality continues today as we seek to observe the rights and respect the dignity of staff, students, visitors and others with whom the University has contact, and to create a positive, inclusive and diverse working, learning and social environment, free from unfair discrimination, prejudice, intimidation and all forms of harassment.

Aims and Objectives

3. We aim to develop, maintain and support a policy of equality of opportunity which creates the conditions in which individuals are treated equitably irrespective of any criteria which cannot be shown to properly justify a difference in treatment or actions on the part of the University, its staff or agents.

Extent

4. This policy is promulgated by the University Council pursuant to Statutes 3(3) and 3(4).
5. This policy applies to the central University, that is to say, to all persons employed by the University, to all students of the University who are not students of a College or of an Associate or Affiliate Institution, and to all activities, services, Institutes and so on which are part of the University and which have no separate corporate legal existence.
6. Notwithstanding paragraph 4 above, the obligation cast by the Statutes on the central University extends to all persons, including students and staff of the Colleges, who may have dealings with or be affected by actions of the University.

Neither Statute 3(3) nor this policy affects the employer-employee relationship of the Colleges. This is in accordance with Statute 21(1), which provides that the University Council 'shall have no powers or duties in respect of affairs of the Colleges which are wholly within the remit of the Colleges'.

Policy

7. The policy of the central University is that in all its dealings with actual or potential students, staff, those to whom it seeks to offer a service, or those from whom it seeks to require a service, the primary consideration should be that the individual/organisation meets or is likely to meet the requirements of the programme, course, post, contract or service agreement. Such assessments must be made on merit and judged by reference to the skills, abilities, qualifications, aptitude and potential of the individual/organisation.
8. On this basis, the University will take all reasonable steps to ensure that no actual or potential student, employee, or other contact or visitor will suffer unfair discrimination on the basis of gender, race, colour, ethnic origin, nationality, disability, sexual orientation, marital status,

parental status, caring responsibilities, age, social origins, political opinion or association, trade union membership and activities, religious or similar philosophical beliefs, or other beliefs/lawful preferences privately held on any matter.

Responsibility

9. The Vice-Chancellor has ultimate responsibility for the development and implementation of equal opportunities policies for staff.
10. The following groups and postholders have responsibility for various aspects of Equal Opportunities Policy:-
 - a) The Director of Administration is responsible for determining how complaints of discrimination made by a person other than an employee or student of the University should be handled and investigated.
 - b) The HR Director is responsible for the creation, development and operation of a policy of equal opportunities and for setting out the procedures to be observed in relation to all aspects of employment, including recruitment and selection.
 - c) The Director of Administration is responsible for ensuring that the requirements of Ordinance 27 to ensure an appropriate procedure to handle complaints of discrimination or harassment made by a student are met by all relevant Heads of Responsibility Centres.
 - d) The HR Committee is responsible for approving the procedures and policies proposed by the HR Director and for monitoring the effectiveness of the policy through regular monitoring reports and statistics produced by the HR Director
 - e) The Equal Opportunities Officer is responsible for advising the HR Director on all matters concerning equal opportunities affecting actual or potential staff and for keeping up-to-date on new developments.
 - f) The HR and Staff Development Manager is responsible for providing guidance on general disability matters as well as advising individual staff and students with disabilities on appropriate specialist services, arranging retraining where appropriate and for organising funding for reasonable adjustments where available.
 - g) The trade unions and Staff Association contribute to the maintenance and development of equal opportunities through the machinery for developing policy and for resolving collective issues and in advising and/or representing individual members.
 - h) Heads of Responsibility Centres are responsible for ensuring the application of the policy within their organization and must ensure that all requests and recommendations for appointment, promotion, job evaluation, secondment or reward within their organization are recorded and a note retained of the reasons for acceptance or refusal.
 - i) Heads of Responsibility Centres specifically involved in student activities and student-related services are responsible for monitoring: applications and enrolment by students, access to and use of services, and other aspects of the student experience generally.
 - j) Each member of staff is required to comply with this policy in the course of their employment and not to engage in unfair discrimination against or to harass their colleagues; current, past or potential staff; or current, past or potential students, customers or agents of the University; or current, past or potential visitors to the University.

Implementation and Monitoring

11. The University acknowledges that the implementation of its commitment to equality is a continuing process that needs to be kept under constant review. The process involves establishing best practice, establishing procedures, setting goals to ensure the momentum of implementation is maintained and providing appropriate training and guidance to assist its staff in implementation and understanding of the policy.

12. So far as reasonably practicable, we seek to ensure that actual and potential students, staff, service users and/or suppliers are informed of our policy. In particular, this policy will
 - form part of the Terms and Conditions of Employment for all staff groups
 - be made available to all applicants for vacancies and for student places and/or services
 - form part of employees' Induction Training.
 - be brought to the attention of those employees with HR functions or with responsibility for the admission of students to programmes of study or to accommodation or services.
13. The Equal Opportunities Officer shall be made aware of complaints concerning equal opportunities affecting actual or potential staff and may have a role in advising on short and long-term remedies. However, the Equal Opportunities Officer shall not normally be responsible for handling complaints which are raised under the prevailing complaint, grievance or disciplinary procedures.
14. We will seek to provide appropriate Equal Opportunities training for all staff, particularly those assigned HR functions or with responsibility for the admission of students to programmes of study or to accommodation or services, and to lay members of Council and appropriate committees.
15. Monitoring is necessary to demonstrate compliance with legal requirements and to assist in the analysis necessary to assess and to enhance the effectiveness of our equal opportunities policy, procedures and performance.
16. The HR Director shall arrange for appropriate records to be kept in respect of actual or potential staff and arrange for selection procedures (including those for training and staff development activities) to be monitored, and shall make an annual report to the HR Committee and make similar reports to other staff representative and consultative bodies as agreed.
17. The HR Director shall ensure the collection of such information as considered necessary for effective monitoring. Specifically, the HR Division will monitor applicants, appointees and existing staff with particular but not exclusive regard to recruitment, promotion and regrading, merit pay, access to training and staff development opportunities, and reasons for leaving to provide statistical and other reports to show how our policy is being implemented. The monitoring process will provide data for the University to evaluate how far goals are being achieved while also providing information on formulating new goals.
18. The Heads of Responsibility Centres with specific responsibility for student activity and student-related services shall arrange for appropriate records to be kept in respect of actual or potential students and arrange for selection procedures and service-delivery to be monitored and shall make annual reports to the Board/Committee with the appropriate oversight/advisory function for the individual responsibility centre(s).
19. The effectiveness of the policy shall be reviewed regularly in consultation with the locally recognized trade unions and staff association and appropriate student representatives.

Publication of Monitoring Data

20. Data collected for monitoring purposes will be published on our website at least annually and will be reported on a termly basis to the HR Committee and to the joint forums for consultation with trade unions and the Staff Association in respect of staff data, and annually to the Board/Committee with the appropriate oversight/advisory function for the specific responsibility centre(s) in respect of student data.
21. The presentation of such information shall observe the University's legal and contractual responsibilities in respect of individual confidentiality particularly in regard of sensitive data and will not unnecessarily identify individuals.

Scope and Limitations

Gender and Marital Status

22. The University may opt to extend to a partner of an employee or student any benefits made available to a spouse of an employee or student, but shall not be obliged to do so except as required by law.

Age

23. The University shall not unfairly discriminate on the grounds of age. However nothing in this policy shall prevent the University from prescribing a retirement age or ages for its employees within the law and it may therefore be reasonable for the University to take into account the age of actual or potential employees in making employment decisions with specific regard to retirement age.

Parental Status

24. The University shall regularly monitor demand for child-care facilities for its students and employees.
25. Consideration will be given to child-care facilities local to the place of work or study to determine and keep under review whether there is a need to establish a crèche or nursery. Any such provision will, however, be required to operate on a self-financing basis whether operating alone or in cooperation with other university and/or non-university employers.
26. Requests from individuals with parental responsibilities for the normal pattern of work to be adapted to assist them in the fulfillment of those responsibilities will be given sympathetic consideration and, subject to working needs, will not be unreasonably refused.

Caring Responsibilities

27. The University's consideration of those with caring responsibilities is not limited to those with parental responsibility, but extends to those with responsibilities related to the care of a family member or similar dependants. Requests for Special Leave, Flexible Working, and similar requests for modifications in contractual arrangements, whether ongoing or for a limited period, will be given sympathetic consideration and, subject to working needs, will not be unreasonably refused.

Equal Opportunities Officer

28. The HR Director will nominate a suitably senior individual (normally a member of the HR Division staff) to act as Equal Opportunities Officer in all employment matters.
29. The individual undertaking the role of Equal Opportunities Officer may vary from time to time and any individual wishing to contact the Equal Opportunities Officer on any employment matter should therefore approach the HR Division General Office in the first instance, who will provide the relevant contact details
30. The role of the Equal Opportunities Officer shall be to keep up to date on new developments in the field of equality and employment and to advise the HR Director on all matters concerning equal opportunities. S(he) shall be made aware of complaints concerning equal opportunities affecting actual or potential staff and may have a role in advising on short and long-term remedies. However, the Equal Opportunities Officer shall not normally be responsible for

handling complaints which are raised under the prevailing complaint, grievance or disciplinary procedures.

Recruitment and Selection of Employees

31. The application of best practice in recruitment and selection is one of the foundations upon which the University relies in achieving equality of opportunity in employment. We have developed and will keep under a process of review procedural guidelines on all matters from job design through to determinations on salary on appointment, designed to ensure that decisions on appointments are made wholly on merit. Such guidelines (separately published) are brought to the attention of all individuals involved in the recruitment process.

Job Description and Person Specification

32. The duties of the role and the essential and desirable requirements of the person to perform it shall be identified before recruitment. The educational qualifications, work experience, physical and mental abilities and personal attributes required shall only be those that are relevant to the performance of the job.

Publicising Vacancies

33. Vacancies shall normally be required to be widely publicised within the organisation at a minimum and recruitment shall not normally be based solely on the recommendations of existing employees in the area of the vacancy.
34. The method of advertising vacancies shall not unreasonably deter applications from any group and, though the University may specifically target under-represented groups, it shall be clear that selection is solely on the basis of merit and under-representation shall not itself be a factor in selecting an individual for appointment.

Application Methods

35. The University will ensure that application methods limit the requirement for information to that which it is necessary or highly desirable to possess in order to assess the candidate's suitability for the vacancy and that the design of application forms and/or methods of application does not require a higher standard of English or comprehension, or physical or mental ability, than is necessary for the performance of the job.

Monitoring

36. Equal Opportunities monitoring will be required for all recruitment processes and the data collected from monitoring subject to regular analysis to determine any underlying trend which may indicate a requirement for action to create equality of opportunity and eliminate unfair discrimination.

Selection

37. The University will ensure that all those involved in recruitment and selection are suitably experienced or trained and aware of their responsibilities in law and under this policy, and shall ensure procedures are in place to monitor the activities of selection panels to ensure that candidates receive fair consideration.
38. Selection tests shall measure only those qualities and skills relevant to the job and reasonable adjustments shall be made to test requirements to ensure their suitability for candidates with disabilities.

Appointment

39. The University requires that the determination of salary on appointment should have proper regard to the need:
- to pay equally for work of equal value
 - not to import unfair pay differentials from other employers
 - not to take into consideration factors which may have a disproportionate impact on a particular group.
40. Salary on appointment shall follow the principles of fair and equal treatment.

Contracts of Employment and Working Conditions and Arrangements.

41. The University's Terms and Conditions of Employment shall include this policy and shall make it clear that employees must comply with the policy, that discrimination and harassment are serious disciplinary offences, and that infringement of the policy may result in dismissal.

Probation

42. Probation procedures, including induction, training, monitoring, guidance and warnings, shall be in accordance with guidance issued from time to time by the HR Director.
43. All staff of the same category shall serve the same length of probationary period or none although variation shall be permitted only for clearly defined and objectively justifiable reasons.

Special Leave

44. Sympathetic consideration shall be given to all reasonable requests from employees to carry over leave from one holiday year to the next or to take unpaid leave to visit close relatives in their countries of origin or close relatives who have emigrated to other countries or otherwise live overseas, or those nursing or otherwise providing care for a close relative or similar dependant. Subject to working needs, permission shall not be unreasonably withheld.
45. Similarly, the University shall give reasonable consideration to any request for special or extended leave resulting from the employee's cultural or religious needs or obligations. Any such leave not drawn from the employee's existing paid annual entitlement would normally be available only on an unpaid basis.

Flexible Working

46. The University is committed to preserving and promoting employment opportunities to individuals with personal or domestic circumstances, or physical or mental disabilities, incompatible with the normal established patterns of work.
47. In addition to meeting its statutory obligations in respect of employees who, as a result of their parental responsibilities or following disablement, wish to adopt more flexible working patterns, the University will give equal consideration, and will not unreasonably refuse, any request made to adapt working patterns and regimes to meet changes in personal and domestic circumstances.
48. In addition, the University shall give reasonable consideration to any request made to vary normal working hours to meet an employee's religious or cultural needs or obligations.

Training, Appraisal and Staff Development

49. Training of employees shall take account of this policy and include the provision of appropriate equality training – in particular for staff with managerial or supervisory responsibility and/or for the

control and monitoring of the policy, and for staff engaged in client-facing or supplier-selection and similar activities.

50. The Staff Development and HR Manager shall ensure that the training needs of individuals are assessed, particularly those of staff within the following groups:-
- Employees with disabilities or learning difficulties, or whose comprehension of written and spoken English is limited
 - Employees returning to work after a significant period of maternity/parental/adoption leave or after a career break
 - New employees
 - Employees who are members of groups under-represented in our employment or within a particular staff group
 - Employees in staff groups for whom opportunities for advancement have historically been limited.
51. The University shall ensure that a scheme for the appraisal and personal and career development of staff is established on clearly defined principles free of unfair bias and that staff are regularly assessed to assist in identifying and rectifying areas of imbalance in the provision of opportunities for training, development and advancement.
52. The Staff Development and HR Manager shall ensure that training opportunities are widely advertised to ensure, so far as possible, that all staff are aware of them and will ensure that training and development opportunities are not unreasonably withheld from any individual.
53. The University shall work to ensure equal access to training and development opportunities for staff working non-standard working patterns and, as appropriate, those on maternity, parental or adoption leave including, where appropriate, payment or equivalent time off in lieu to staff attending outside of their normal working hours.
54. The Staff Development and HR Manager shall ensure that special consideration is given to the induction and other training needs of disabled staff, including training in the use of special equipment and such training as may be necessary for the colleagues of disabled staff to ensure a safe and supportive working environment.

Secondment, Promotion, Job Evaluation and Reward Opportunities

55. The University is committed to making access to advancement and reward (including secondment, promotion, job evaluation, merit payments and salary increases paid on merit) available to all its employees on an equal basis and will develop procedures to ensure that the criteria used to determine the success of requests or recommendations for advancement or reward are fair and open and that decisions are consistently made in accordance with these criteria.
56. Individuals who believe that they have been unfairly discriminated against in relation to access to or refusal of secondment, promotion, and/or reward opportunities, may wish to approach the HR Division in the first instance, or otherwise raise a complaint under the relevant grievance procedure (see Complaints of Unfair Discrimination). Similar complaints in respect of job evaluation should normally be addressed through the job evaluation appeals procedure in the first instance.

Philosophical, Religious and Cultural Needs and Beliefs

57. The University will make reasonable efforts to meet the needs and preferences of individuals arising from their religious or cultural obligations and beliefs and shall not place unreasonable constraints upon such individuals.

58. In respect of staff, requests made with adequate notice with respect to the timing of annual leave, special, unpaid or extended leave, and changes in normal hours of working, shall be given appropriate consideration and, subject to working needs, shall not be unreasonably refused.

Disability

59. The University is committed to a policy of equality of opportunity for disabled individuals.
60. In recruitment of staff and of students, every effort is made to ensure that individuals with disabilities are not deterred from making an application.
61. The Staff Development and HR Manager has been given specific responsibility for advice and guidance to managers and heads of responsibility centres considering the appointment of a disabled individual and will provide similar advice in respect of students. S(he) will ensure that the University exploits those opportunities available to make reasonable adjustment to accommodate the disabled employee or student and will also offer advice and guidance to the individuals themselves as required.
62. Where an employee becomes disabled during their period of employment, the University will assess the individual's ability to continue in their current role (with retraining as necessary and after such reasonable adjustments as may be appropriate have been made). Where this is not reasonably practicable, every effort shall be made to retrain the employee and offer suitable alternative work. Similar arrangements will apply in respect of students, in that the University will assess the individual's ability to continue in their current study, making reasonable adjustments where these are appropriate, and (where the individual could not continue in their current course of study), to make every reasonable effort to offer a suitable alternative.
63. Appropriate consideration shall be given to the provision of facilities for people with disabilities in the design and conversion of buildings.

Language Requirements

64. The University employs a large number of individuals for whom English is not the first language and acknowledges that a proportion of such staff may have a limited grasp of spoken or written English. Language difficulties may also arise from an individual's disability.
65. The HR Director shall ensure that in the operation of all employment procedures (including disciplinary or grievance procedures, training and appraisal) where s(he) considers that communications difficulties are likely to arise and/or the employee may suffer an unreasonable detriment because of a disability or inadequate understanding of English, provision is made (usually by use of an interpreter) to assist the employee. An interpreter shall not represent the employee or employer or affect representational rights at a disciplinary or grievance proceeding. Nor shall the fact that assistance was needed and / or provided invalidate the outcome of any procedure.
66. A large proportion of the University's students will have English as a second language. While a particular standard of written and spoken English is essential to acceptance of the student for a course of study, the University will endeavour to ensure that no individual is unreasonably excluded from a course of study or suffers an unreasonable detriment in respect of their access to student services arising from their English language skills.

Complaints of Unfair Discrimination

67. Allegations of discrimination by candidates for a vacancy shall be investigated and a report submitted to the HR Director who shall take whatever action is necessary.

68. Employees who believe that they have not been treated equitably in accordance with this policy, or have a complaint of discrimination, harassment, or victimization resulting from an earlier complaint or allegation may make their complaint either informally or formally through the existing Grievance Procedure. Should they prefer, employees may approach a member of HR Staff for advice and guidance in the first instance. An individual raising an informal complaint in the first instance may nevertheless be accompanied by a trade union representative or work colleague during any discussion of the matter with the staff of the HR Office.
69. Students who believe that they have not been treated equitably in accordance with this policy, or have a complaint of discrimination, harassment or victimisation resulting from an earlier complaint or allegation may make their complaint either formally or informally through the appropriate grievance procedure(s) established under Ordinance 27.
70. Other individuals who believe that they have not been treated equitably in accordance with this policy, or have a complaint of discrimination, harassment or victimisation resulting from an earlier complaint or allegation may make their complaint either formally or informally to the Director of Administration.
71. Formal complaints against a member of staff relating to unfair discrimination against, harassment of, or victimization of another individual shall be handled under the disciplinary procedures. Where a request has been made to handle the complaint informally, it may not be appropriate for the University to apply the disciplinary procedure. However in such circumstances the employee will be made aware that if the situation is not resolved to the satisfaction of the complainant or the University, formal disciplinary action may follow.
72. A member of staff found to have unfairly discriminated against, participated in the harassment of, or victimized a member of staff making an allegation of discrimination or harassment may be dismissed. Where action short of dismissal is appropriate, this may include a requirement for the individual to attend suitable training and s(he) may be prevented from participating in employment processes including shortlisting and interview, recommendation for appointment, recommendation for reward and training, job evaluation processes, appraisal processes and disciplinary processes until such training has been completed. This sanction may only be used to prevent unfair discrimination, harassment or victimization. Thus any such prohibition will relate solely to the individual's participation in recommendation, review or similar decision-making processes where their actions or beliefs may adversely affect others. The employee will not themselves be prevented from applying for or receiving fair consideration in respect of transfer, promotion, regrading, salary review or reward, staff development or training etc during this period.
73. Monitoring of equality statistics and of allegations of discrimination shall be used to identify areas where a recurring problem exists and further investigation is required.