



University of London

Race Equality and Diversity Policy and Action Plan

Note 1: Throughout this document, the Race Equality and Diversity Policy and Action Plan is referred to as 'the Policy and Plan' or, when referring either to the Policy or Plan alone, as 'the Policy' and/or 'the Plan'.

Note 2: Throughout this document, 'trade union' or 'trade unions' means those trade unions recognised by the central University and 'Staff Association' means the central University Staff Association.

Introduction

1. The Race Relations Act 1976, as amended by the Race Relations (Amendment) Act 2000 (hereafter referred to as 'the Act'), places a general duty on the University to promote race equality with the aim of putting promotion of race equality at the centre of the way we work, with particular emphasis on the availability and delivery of services and in relation to matters of employment and recruitment.
2. Founded upon the principles of equality and established to provide education on the basis of merit and without regard to race, creed or political belief, the University has embedded a requirement not to 'discriminate against any person on the grounds of colour, race, nationality, ethnic or national origin, (or) religion...' within its Statutes. In that context, we welcome our duties under the Act as part of our proud tradition of commitment to ensuring equality of opportunity for all, including our current, past and potential staff, students, external business partners and academic stakeholders, and the general public in London and beyond.
3. The Equal Opportunities Policy formulated by the central University to meet the requirements of the Statutes establishes a clear duty to ensure that we treat all individuals fairly and equally. In the creation and application of our policies generally and in our day to day activities, 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.
4. By this Policy and Plan, the University affirms its specific commitment to the promotion of equality, diversity and good race relations and its opposition to all forms of unfair or inequitable treatment, including discrimination, harassment, or victimisation, whether directed at groups or individuals, on the grounds of race, colour, racial, ethnic or national origin or group, traveller status, or refugee/asylum/immigration status.

Summary of the University's Duties Under the Act

5. Under the Act, the University must, in carrying out its functions, have due regard for the need to eliminate unlawful racial discrimination and to promote equality of opportunity and harmonious race relations. Our further, specific, duties under the Act are to:
 - ◆ prepare and publish a Race Equality Policy, including an indication of arrangements for the publication of the policy and, annually, the results of impact assessments and monitoring;
 - ◆ make arrangements to meet our specific duties on policy and employment and assess the impact of our policies (including the race equality policy) on different racial groups.
 - ◆ monitor, by reference to racial group, the admission and progress of students and the recruitment and career progression of staff.

Scope

6. The University of London is a federation of 19 separately incorporated, self-governing, directly-funded Colleges together with a range of central academic activities. All award University of London degrees, collectively ensure the standards of the University's degrees, and are research-based higher education institutions committed to undergraduate and postgraduate teaching of the highest quality in a research environment.
7. The University's Colleges are employers in their own right, required to address the general and specific duties under the Act and establish their own, individual, race equality policies. In that context, it must be understood that this Policy is not the policy of the University of London, but rather of the central University; the central academic activities and a number of student and administrative services, with the central offices, together constitute the central University.

Aims and Objectives

8. As part of its core purpose, the University recognises that its potential for excellence and equality can only be realised by encouraging our students and staff to achieve their full potential and we therefore 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, its students, or its agents and business partners. To enable current and future generations of students and staff to realise their full potential, the University will utilise its role in the wider community and promote diversity, respect and tolerance throughout society. We intend that the Policy and Plan trigger action throughout our community by requiring every member of the University to consider their approach to race relations, equality and diversity in the light of both our general and specific duties under the Act.
9. With specific regard to our commitments in respect of race equality and diversity, we seek to ensure the day to day promotion of equality of opportunity by creating an environment where harmonious race relations will be the norm, and to eliminate unfair and / or unlawful discrimination wherever and whenever it may be identified.
10. To meet these aims, it is our intention to expressly, positively and proactively promote:
 - ◆ the principles and values which underpin the University's approach in all its activities;
 - ◆ the scope of this Policy and Plan;
 - ◆ our strategic objectives in relation to the active promotion of race equality and diversity in the workplace;
 - ◆ our strategic objectives in respect of equality of treatment in the delivery of and access to goods and services;
 - ◆ those specific and general action(s) identified as necessary or beneficial to ensure compliance with our general duties under the Act;
 - ◆ timescales (for action and/or review) and targets by which we will measure improvement;
 - ◆ our communication and consultation strategies;
 - ◆ robust arrangements for the reporting and independent investigation of complaints of overt discrimination or harassment, and for acting upon statistical evidence that would appear to identify anomalies indicative of direct or indirect discrimination;
 - ◆ transparency in our decision making and in reward mechanisms.
11. In meeting its duties, the University will, as part of this Policy:
 - ◆ Create and promote a positive, inclusive atmosphere of respect for differences of race, ethnicity and cultural experience;
 - ◆ Challenge and prevent discrimination;
 - ◆ Intervene to address perceived inequalities between specific racial groups in respect of their relationship with the University and achievement levels and progress within the University;

- ◆ Aim to achieve an ethnic balance in the workforce and student body properly representative of the communities served by the University in London and beyond;
- ◆ Promote study, training and development opportunities for ethnic minority students and staff, thereby assisting retention of their much valued and diverse skills and life / work experience.

12. By all these actions, the University expresses its commitment to
- ◆ Widening access to education and employment across all ethnic groups, and
 - ◆ the improvement of race relations generally;
- and seeks to
- ◆ encourage communication and understanding between the University and its staff and students;
 - ◆ develop those staff and students to realise their full potential; and
 - ◆ increase both racial and cultural diversity and the appreciation of the benefits that diversity presents for each and all of our students and staff.

Leadership, Management and Responsibility

13. Positive and consistent leadership is essential to the promotion of good race relations and to the development of a culturally diverse organisation. The Vice-Chancellor shall lead as the public face of the University in challenging inequality and promoting harmonious race relations, and the widening of access and opportunity. Responsible for working with the University Council, HR Committee, and Senior Officers of the University to promote race equality and the provisions of this Policy, the Vice-Chancellor will provide a consistent and public lead on issues of race relations and equality throughout the University's community and direct managerial action to ensure the Policy and Plan is implemented and followed and the principles of race equality are embedded in University policies generally.
14. The University Council is ultimately responsible for ensuring that the University acts within the requirements of, and meets all its duties under, the Act and for ensuring that the Policy and its procedures are followed. The Council shall, in particular, monitor the work of its Committees and Boards to ensure that the general duty under the Act is achieved and utilise its access and influence at federal level to ensure that the members of the federal University not directly under the central University's control or influence are encouraged to adopt suitable frameworks for equality in their federal and individual operations.
15. The Vice-Chancellor, Director of Administration, HR Director and Equal Opportunities Officer will assume responsibility for providing the appropriate strategic direction and co-ordination of day-to-day management involvement, reporting regularly to the HR Committee of the University Council, the University's Senior Management Team, its staff consultative group(s), trade unions and Staff Association.
16. 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. 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 equality and may have a role in advising on short and long-term remedies.
17. The following groups and postholders have responsibility for various aspects of the Policy and Plan:
- a) Committees and Boards of the University: for identifying and assessing the impact of their policies, strategies and actions on students and on staff from different racial groups and for ensuring identified requirements for change are implemented.

- b) The Vice-Chancellor, Director of Administration, HR Director and Equal Opportunities Officer: for providing the appropriate strategic direction and co-ordination of day-to-day management involvement, reporting regularly to the HR Committee of the University Council, the University's Senior Management Team, its staff consultative group(s) and associated working group(s), trade unions and Staff Association.
- c) The Director of Administration: for determining how complaints of discrimination, harassment or victimisation made by a person other than an employee or student of the University are handled and investigated.
- d) The Director of Administration: 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 (HORCs).
- e) The HORCs specifically involved in student-related and academic services¹: for the creation, development and operation of this Policy in respect of goods and services offered to students, and for setting out the procedures to be observed in relation to all aspects of student access and the student experience. They will ensure that policies and practices of the University take full account of the principles of race equality and that targets set out in the Plan relating to students are pursued and achieved, including establishing arrangements for monitoring and the regular analysis of data to identify potential problems and ensuring any identified problems are appropriately addressed.
- f) HORCs generally: for implementing the Policy in relation to the staff of their department, assessing the impact of the Policy on their department and ensuring that their staff are aware of their responsibilities under the Policy and given appropriate training and support to meet those responsibilities.
- g) The HR Director (reporting to the HR Committee): for the creation, development and operation of this Policy, setting out procedures to be observed in relation to all aspects of employment (including recruitment and selection), ensuring that the employment policies and practices of the University take full account of the principles of race equality and that targets set out in the Plan relating to employment are pursued and achieved.
- h) The HR Committee of the University Council: for scrutinising and approving the procedures and policies proposed by the HR Director and monitoring the effectiveness of the Policy through regular reports and statistics presented by the HR Director.
- i) The appropriate Boards/Committees (which shall vary with the Responsibility Centre) with the relevant oversight/advisory function: for reviewing reports, assessments and monitoring produced by Responsibility Centres with specific student activity or student-service functions to ensure their effectiveness. Such reports shall be collated for presentation to the University Council to perform a similar role as appropriate.
- j) The Audit Committee: for including an audit of equality monitoring and processes in internal audit reviews.
- k) The Equal Opportunities Officer: for advising the HR Director on all matters concerning race equality affecting actual/potential staff and for keeping up-to-date on new developments.
- l) The HR and Staff Development Officer: for providing guidance on appropriate training and development to assist in achieving the University's targets in relation to race equality and diversity within employment (including student service and customer facing employments) and in terms of the delivery of and access to goods and services.

¹The University Library, the University of London Careers Service, the Intercollegiate Halls of Residence, the Accommodation and Property Management Office, the University of London (Student) Union, the School of Advanced Study and its constituent institutes, the British Institute in Paris, the University Marine Biological Station, the Academic Policy & Services Division, the External & Internal Student Administration (including the External Programme)

m) The trade unions and Staff Association: for contributing to the maintenance and development of the Policy and Plan through the machinery for developing policy and for resolving collective issues and in advising and/or representing individual members.

18. Finally, and fundamentally, each member of staff is required to comply with and to support the aims of the Policy in the course of their employment and is obliged to participate in promoting race equality and harmonious race relations, and to recognise and tackle racial bias/stereotyping, and is required not to engage in unfair discrimination against, or to harass or victimise, their colleagues or staff, the University's students, customers, agents or visitors.

Information, Consultation and Communication

19. The University will publish its Policy and Plan widely to be accessible to current and potential students, staff and others having dealings with the University. In addition to the Policy and Plan, the University shall publish the results of its impact assessments and ethnic monitoring annually on the University website and elsewhere as appropriate.
20. To launch the revised Policy and Plan, senior managers of the University will be required to address its provisions in their routine management meetings and all existing University students and staff will be advised of the existence and on-going development of the Policy. New students and staff will be advised of the provisions of the Policy at the point of induction and the existence of the Policy will also be drawn to the attention of prospective students and staff.
21. Ethnic minority students and staff will be consulted through Focus Groups and by any other appropriate means, and feedback (whether made by individuals or collectively through student representative bodies, staff representative groups, trade unions or the Staff Association) will be invited, welcomed and actively considered.

Functional Implementation and Monitoring

22. The University acknowledges that the implementation of its commitment to promoting and delivering race equality and diversity is a continuing process that needs to be kept under constant review. The process involves establishing best practice, a sound procedural framework, 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.
23. To these ends, the University will regularly assess this and other policies at a senior level and make revisions where impact assessments and the results of data analysis demonstrate inappropriate effect of our policies on individuals of different racial groups. Such progress will be carefully co-ordinated in partnership with the trades unions and Staff Association (through a selection of appropriate internal committees - including a staff consultative committee and its associated Equal Opportunities Working Group), the HR Committee and the University Council. Results of monitoring will be compared with local and national benchmark data wherever available.
24. So far as is reasonably practicable, we seek to ensure that actual and potential students, staff, service users and/or suppliers are informed of our Policy. In particular, in addition to our commitments on publication of the Policy and Plan and the results of impact assessments and monitoring, we will:
- ◆ incorporate a requirement to commit to both the general and specific duties under the Act and the aims and objectives of our Race Equality Policy into the Terms and Conditions of Employment for all staff groups;
 - ◆ raise awareness of issues of equality and diversity generally and the Race Equality Policy at an early stage of employment through Induction Training;
 - ◆ Ensure that those employees with human resource/personnel administration/management responsibilities, or with responsibility for the admission of students to programmes of study or

to accommodation or services, are aware of the requirements of the Policy and Plan and receive appropriate training.

Records and Monitoring: Collection, Analysis, Publication and Action(s)

25. The University will, as a minimum, monitor the following activities by ethnicity, and introduce additional monitoring as necessary, appropriate, beneficial and/or reasonably practicable:
- ◆ Activities relating to the seeking of work with the University: including monitoring of initial enquiries; applications; sources of applicants; drop out rates; success rate at shortlist, interview and offer stages; selection rates; and numbers accepting job offers;
 - ◆ Activities relating to working for, and the cessation of employment at, the University: including the makeup of the workforce (broken down by Responsibility Centre, Job Type, Grade, Contract Type etc) and including agency temporary/contract workers, casual/occasional paid workers as well as established staff; access to staff development and training opportunities (including method of access, i.e. individual application of management recommendation etc); applications for secondment, promotion and/or job evaluation and outcomes; applications and recommendations for merit pay/other forms of reward and outcomes and access to benefits; those who are involved in raising or those who are the subject of complaints (including complaints of discrimination or harassment); grievance/ disciplinary proceedings and actions and outcomes – including appeals; and reasons for leaving and/or dismissal or other termination of employment;
 - ◆ Activities relating to academic activities and the student experience: including success and failure rates for admission; take-up and offered placements; the makeup of the student body (broken down by Institute/Programme, qualification type/level, subject of study etc); access to goods and services (including accommodation, library services and careers services); drop-out rates; progress and achievement levels; assessment outcomes (including type of assessment); class of degree; complaints of harassment; discrimination and/or unfair treatment; appeals and their outcomes; reports of racist incidents and outcomes; work placements; satisfaction surveys; complaints by students.
26. In devising the ethnic categories for monitoring, the University exceeds the census categories in employment monitoring and has drawn on the expanded categories suggested by the Commission for Racial Equality. We shall continue to keep categories under review for all forms of monitoring to determine and consider increasing the spectrum of categories (albeit in ways compatible with census categories) to recognise diversity, encourage participation in and improve the accuracy and value of monitoring.
27. Those approached to participate in monitoring will be made aware that their contribution is voluntary and that the information provided is treated with the utmost confidentiality, used only for the specific purposes for which it was obtained and published so as not to identify the individual. The presentation and publication of information collected through monitoring shall observe the University's legal and contractual responsibilities in respect of personal and / or sensitive data.
28. Wherever sufficient data for statistical validity exists, it will be analysed regularly with a view to establishing those areas where there may be inappropriate or (direct or indirect) discriminatory impact with a view to taking immediate corrective action; first seeking to identify and assess the nature and extent of the problem before ensuring that the most appropriate solution is achieved. Where there is insufficient data for statistical validity, the University will nevertheless make every reasonable attempt to ensure that there is no inappropriate inequality in the impact of its policies and procedures on individuals of different racial groups.
29. In particular, where analysis of monitoring data highlights the under-representation of particular ethnic groups, the University will:
- ◆ Give appropriate consideration to funding advertisements, editorial or other publicity to encourage applications from sectors of the community under-represented amongst students or staff;

- ◆ Give appropriate consideration to the introduction of Focus Groups to identify areas in which the University can improve race relations and its appeal to sectors of the community under-represented amongst students or staff;
 - ◆ Give appropriate consideration to the introduction of a mentoring scheme to assist those students or staff in under-represented groups to fully realise their potential.
30. The HR Director shall arrange for appropriate records to be kept in respect of employment actions and procedures and ensure the collection of such information as is considered necessary for monitoring. Drawing on analysis of data collated through monitoring and by other means, the Director shall make an annual report to the HR Committee and similar reports to other staff representative and consultative bodies on progress in meeting the aims of the Policy and Plan and new initiatives to meet the University's general and specific duties under the Act. In addition, the effectiveness of the Policy as it affects actual or potential staff shall be reviewed regularly in consultation with the trade unions and Staff Association.
31. The various HORCs engaged in student-specific or academic activities will arrange for appropriate records to be kept in respect of actual or potential students and ensure the collection of such information as is considered necessary for monitoring. Drawing on analysis of the data collated through monitoring and by other means, HORCs shall make an annual report to the relevant Board(s)/Committee(s) with the appropriate oversight/advisory function and similar reports to other student representative and consultative bodies on progress in meeting the aims of the Policy and Plan and new initiatives to meet the University's general and specific duties under the Act. In addition, the effectiveness of the Policy as it affects actual or potential students shall be reviewed regularly in consultation with appropriate student representatives.
32. When the University has a contract or other agreement with a private company or voluntary organisation to carry out any of its functions (in particular those relevant to recruitment of staff or students, employment, or services to students or, where the agents or staff of that private company/voluntary organisation may have contact with our employees, students or others for whom the University provides a service) HORCs must ensure that any formal tender, service level agreement or other formal / less formal business arrangement is made subject to appropriate agreement to our policies and objectives on race equality and the promotion of good race relations.
33. While in general terms analysis of data collected through impact assessment and monitoring exercises will demonstrate the effect of our policies on individuals of different racial groups and allow the University to evaluate its progress towards its goals and develop and establish new goals, the University will take additional specific actions in respect of its functions as detailed below.

Federal Relationships

34. Although the University has no direct powers over, or responsibilities for, the students of the constituent colleges in respect of their responsibilities under the Act, we will observe our duty to satisfy ourselves that our federal partners, and indeed all those with whom we enter into formal or informal partnerships or collaborations, are observing their duties under the Act by:
- ◆ requiring the separately incorporated Colleges to provide the University Council with copies of their own race equality policies and action plans and annually to submit to Council copies of their annual impact assessments and data published under the requirements of the Act
 - ◆ establishing that the University Council must be satisfied as to the existence of an appropriately developed race equality policy and action plan prior to admitting any college as a College of the University, and as a condition of the conferment of degree awarding powers on any College.

35. It should be noted that the central University is similarly required to present its Policy and Plan and impact assessments and data to Council via its HR Committee and that the various HORCs with responsibility for student/academic activity and services shall submit reports, assessments and monitoring to the Board/Committee with relevant oversight/advisory functions for their responsibility centre which may be collated for submission to Council as appropriate.

Governance

36. The University undertakes to:
- ◆ build race equality impact questions into policy development and planning processes;
 - ◆ use policy impact assessments to identify specific race equality targets and action requirements;
 - ◆ regularly review and assess all policies and strategies for their effectiveness and impact in eliminating racial discrimination, and the promotion of racial equality of good race relations;
 - ◆ use reviews, consultations and assessments and data from monitoring processes to inform planning and decision making and to set appropriate targets;
 - ◆ take all reasonably practicable steps to ensure that Council membership reflects the diversity of the University community (and of wider society).

The Role of the University's HR Strategy 2002-2004

37. The University's HR Strategy, accepted in full by HEFCE, underpins the University's express commitments and pro-active efforts in relation to promoting race equality, diversity and widening and equal participation in matters of employment, the generality of student experience, teaching and research. The actions contained in the Policy and Plan support and build upon these, and will make a substantial contribution to the development and dissemination of good practice by placing a proper value on cultural diversity and achieving equality and harmonious race relations.
38. Within the context of the HR Strategy, the Policy and Plan is intended to provide comprehensive coverage in relation to issues affecting staff and students of the University, including: recruitment; selection; retention; training and professional development; performance management; pay, reward and promotion; discipline and grievance; external organisations and relationships; consultation and communication, and the student experience generally.

Academic and Student Matters

39. In keeping with its history of promoting academic freedom, intellectual integrity and a broadening of access, the University is committed to pursuing equality of opportunity, diversity and excellence in undergraduate and postgraduate teaching and student services.
40. Student-specific services currently comprise: the University Library, the University of London Careers Service, the Intercollegiate Halls of Residence, the Accommodation and Property Management Office, the University of London (Student) Union, the Academic Policy and Services Division, the External & Internal Student Administration Division
41. Academic activity is provided / undertaken by: the School of Advanced Study and its constitute institutes, the British Institute in Paris, the University Marine Biological Station, the External Programme.
42. The nature and scope of the academic and student activities and the unique characteristics of the federal University generally, and the School of Advanced Study and External Programme in particular, there is no one individual with responsibility for the implementation plan in respect of student matters. Activity will be co-ordinated through the HR Director and the Vice-Chancellor and/or Council will act as appropriate to direct activity as necessary.

The Student Experience

43. Noting that (other than in relation to registered students of the School of Advanced Study, the Institutes and the significant number registered with the University's External Programme), responsibility for the student experience has largely been devolved to the self-governing Colleges which comprise the federal University of London, the University shall:
- ◆ in respect of non-devolved activities, ensure the completion of detailed and thorough equality audits of its student-specific arrangements relating to accommodation, policy, procedure, publicity, publications, documentation, materials and teaching;
 - ◆ In respect of devolved activities, provide a framework - through the University's Statutes and in other ways as appropriate - to encourage the promotion of good race relations and equality throughout the federal University.
44. University 'Open Days' and 'Taster Courses' will be used to promote race equality, good race relations, equality of opportunity and diversity in higher education (and beyond) among the actual and potential student population (particularly at secondary education level) and the general public.
45. The University will actively involve the Sabbatical Officers of the federal University of London (Students) Union in the development and regular review and revision of the Policy and Plan.

Student Admissions

46. The University undertakes to:
- ◆ Encourage applications from all racial groups;
 - ◆ Ensure that admissions procedures are carried out consistently and fairly, with those administering the process aware of their responsibilities under the Policy;
 - ◆ Use the data on applications and take-up to inform planning and decision-making about advertising and student recruitment;
 - ◆ Continue initiatives on widening participation in relation to ethnic minority students;
 - ◆ Publish the results of assessment and monitoring exercises annually, normally in November each year.

Curriculum, Teaching, Learning and Assessment

47. The University undertakes to ensure that student attainment/progress/retention and completion rates are monitored, that assessment criteria are transparent and fair to all students, and that all teaching and learning is informed by an understanding of equality and diversity.

Recruitment, Selection and Employment

48. The University undertakes to:
- ◆ Encourage applications from all racial groups and use the data collated through the recruitment process to inform planning and decision-making about advertising and recruitment;
 - ◆ Ensure that application procedures are carried out consistently and fairly, and that those staff involved in the process are aware of their responsibilities under the Policy, and that information collated through voluntary participation in monitoring is used only for the purposes for which it was supplied and not for the purposes of shortlisting or interview;
 - ◆ Monitor promotion and progression by racial group in order to inform planning and decision making;
 - ◆ Use monitoring information to take action to address inequalities in employment and in access to employment, development opportunities, progression and pay, application of complaints, grievance and disciplinary procedures between staff from different racial groups;
 - ◆ Operate a system of Exit Questionnaires and, on request or as otherwise appropriate, Exit Interviews to gather information that might aid the retention of staff from diverse ethnic

backgrounds and assess availability of opportunity and the impact of our policies, procedures and organisational culture on staff of different racial groups;

- ◆ Make arrangements to publish the results of assessment and monitoring exercises annually, normally in April each year.

49. Every reasonable and affordable effort will be made to encourage the widest pool of applicants for each vacancy, including generic advertising designed to promote race equality and, in respect of specific vacancies and drawing on advice from independent media analysts, advertising targeted at ethnic minority groups.
50. Details of the Policy and Plan will be forwarded to any and all external organisations engaged to assist the University with its recruitment related or employment advisory or partnership needs and, where the University has reason to place vacancies with suitably professional recruitment agencies, placement of business with such agencies will be contingent upon their formal acceptance of and agreement to work within the fundamental tenets of the Policy and Plan.
51. The primary responsibility for the implementation plan in respect of staffing matters lies with the HR Director (who will report to the HR Committee each term on progress) and, in implementing the actions, the HR Director will:
- ◆ create formal and informal working groups of managers and staff;
 - ◆ involve external consultancies in specialist areas such as training and equality audit;
 - ◆ collaborate with other Higher Education institutions in the central London area and beyond;
 - ◆ draw relevant data and support from agencies and organisations with relevant knowledge of race equality issues in the Higher Education sector, e.g. the Commission for Racial Equality, the Equality Challenge Unit and the University Employer's Association;
 - ◆ hold regular discussions on the Policy and Plan with the Joint Working Group on Equal Opportunities, other staff consultation forums, trade unions and the Staff Association.

Training and Professional Development

52. The University undertakes to:
- ◆ collect, analyse and act upon data related to the provision and take-up of vocational training and other opportunities for personal and professional development;
 - ◆ encourage applications for training and development opportunities from all racial groups, and use monitoring data to inform course-development and the publicising of training and development opportunities;
 - ◆ ensure that the admission of individuals to training and development opportunities is consistent and fair, and that those staff involved in the process are aware of their responsibilities under the Policy;
 - ◆ ensure that training and development opportunities and requirements for staff engaged in customer-facing, student recruitment, student-service, curriculum-development, teaching, learning, or assessment activities, and those engaged in duties relating to staff recruitment, selection, development, progression and reward, take appropriate account of the need for those individuals to understand the requirements of the Act and the Policy and Plan, the benefits of diversity and the general duty to promote good race relations.
 - ◆ address under-representation of ethnic minority staff in particular grades and/or grade categories or types of employment, by a scheme of developmental and professional training to prepare staff for internal promotion or transfer to new employments, including appropriate language skills training to increase opportunities for staff without the requisite ability to succeed in roles requiring a higher standard of English language skills
53. The University will provide appropriate training in race equality and diversity awareness issues, and cascade through the University's line management structures from the point of staff induction onwards.

Performance, Pay, Reward and Promotion

54. In the general context of performance management, the University shall establish a greater degree of transparency in relation to the rationale and decision-making process behind starting salaries, discretionary incremental salary progression and the reward of honoraria, responsibility allowances and other merit pay. Data relating to pay, reward and promotion (including job evaluation and internal promotion arrangements) will be collected and regularly reviewed for trends that may be contrary to the University's express intentions and statutory duties and/or otherwise require remedial action.

Staff Discipline and Grievance

55. The University will make appropriate provision to monitor by ethnicity, those employees who are the subject of disciplinary action and those employees who are the subject of a grievance or who raise a grievance under the prevailing procedures, and address any identified potential for direct or indirect discrimination in the operation or outcomes of these processes.

External Business Relationships

56. The University undertakes to review and to monitor its procurement processes for compliance with the Policy and ensure that the Policy and Plan is made available to its business partners, who will be required to subscribe to its fundamental message and provisions and, as appropriate, actively to assist the University in meeting its statutory duties under the Act, its aims under the Policy and in relation to monitoring. Where the business relationship covers a relevant activity under the Act, the continuation of the relationship shall be made contingent upon acceptance.

Community Partnerships and Links

57. The University undertakes to strengthen its links with local and, as appropriate, national minority ethnic groups and organisations and encourage greater dialogue with and participation by those groups in appropriate aspects of University life. Similarly, we aim to participate in local and, where appropriate, national initiatives aimed at improving attitudes to diversity and encourage the development of equality in employment practices.

Facilities and Services

58. The University will, in particular through consultation with ethnic minority students and staff, take reasonably practicable steps to ensure its range of facilities and services are accessible to and culturally appropriate to the needs of current and future staff and students of all racial groups.

Actual or Potential Breaches of the Policy / Failure to Implement the Plan

59. The University will take seriously and investigate any breaches of the Act or the Policy, as appropriate.
60. Breaches of the Act or Policy or failure to implement its aims by a member of staff may lead to formal disciplinary action which may ultimately lead to dismissal
61. Formal complaints against a member of staff relating to unfair discrimination against, harassment of, or victimisation of another individual shall be handled under the prevailing 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.

62. A member of staff found to have unfairly discriminated against, participated in the harassment of, or victimised 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.
63. Formal complaints against a student relating to unfair discrimination against, harassment of, or victimisation of another individual, shall be handled under the Code of Student Discipline (Ordinance 26); if a student is found to have unfairly discriminated against or participated in the harassment of another individual, or victimised an individual making an allegation of discrimination or harassment, this may result in their expulsion.
64. All those with whom the University has a relationship - including its staff and students - should be aware that in serious cases, in particular of harassment or victimisation but ultimately in respect of any breach of the Act, the University or a party to the complaint may notify the Commission for Racial Equality of the breach and that legal action or sanction may ensue.
65. Should the University not be satisfied that a College of the University, business partner or party to a collaboration, is meeting their duties under the Act, we would initially raise this informally with the body involved to request that action be taken to resolve the situation. In the case of a College, the University Council may exercise its powers under Ordinance 21 to seek written assurances on the matter, and may prescribe that continuation of College status is conditional upon correction of any breach. Were there to be a persistent problem or should the body fail to take appropriate action, the University may be required to take more formal action. Such actions may include notification to the Commission for Racial Equality of a breach of the Act, legal action or sanction, termination of - or expulsion from - the partnership or collaboration or, in the case of a College of the University, action may be taken by Council to withdraw the status of the College.
66. The University undertakes to ensure that complaints procedures are adapted to take into account the responsibilities within this Policy, are implemented fairly and monitored by criteria that include reference to racial groups, and that data gathered through monitoring is used to review and inform training programmes, policy and procedure.
67. The Equal Opportunities Officer shall be made aware of complaints concerning race relations 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